



**Reliability & Security  
Workshop**

**WECC**

**March 17–18, 2026  
San Diego, California**

# Culture of Reliability

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## WECC'S MISSION

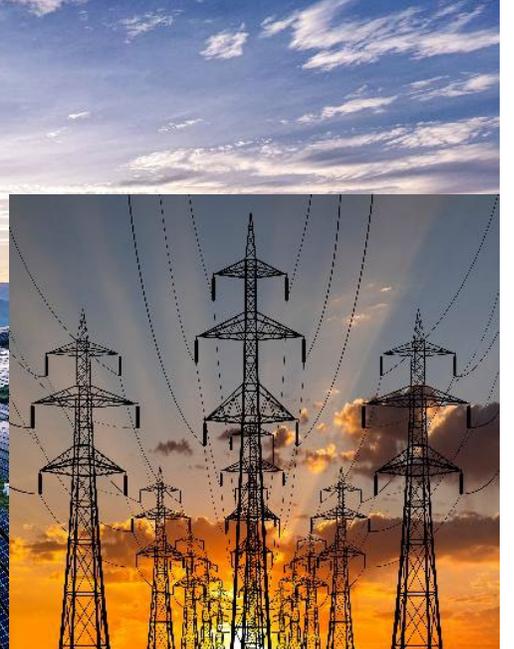
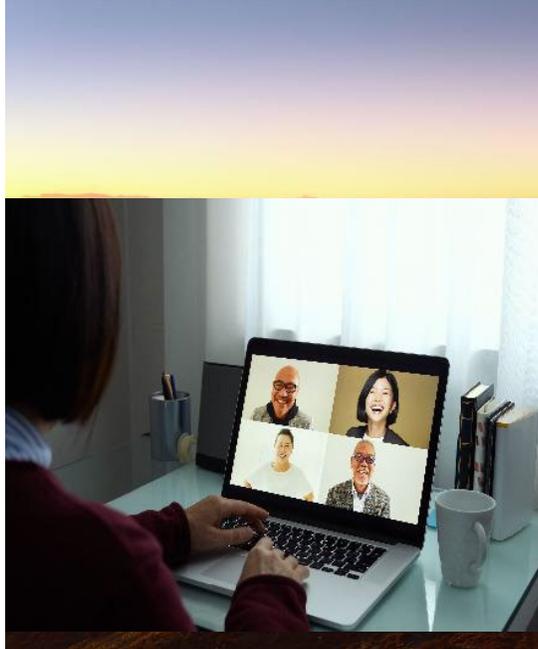
*“To effectively and efficiently mitigate risks to the reliability and security of the Western Interconnection’s Bulk Power System.”*

**The ERO Enterprise is explicitly committed to its collective success in achieving its vision of a highly reliable and secure North American BPS**

With this model in place, once rigid core and flexible edges are defined for each of the ERO Enterprise program areas and business functions, the ERO Executive Committee commits to honor this intention to drive harmony across the seven ERO Enterprise organizations.



# Happened since 2007



# Obligations and Jurisdictions

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- NERC Rules of Procedure govern all activities:
  - Reliability Standard Development process
  - CMEP
  - Organization registration and certification
  - Reliability Assessments and Performance Analysis
  - Infrastructure security and situational analysis
  - Training and Education
- Long-standing concept of using professional auditing standards as basis for CMEP work:
  - FERC directed that NERC and Regional Entities (RE) “base their compliance audit processes in the U.S. on professional auditing standards recognized in the U.S., such as Generally Accepted Accounting Standards, Generally Accepted Government Auditing Standards, and standards sanctioned by the Institute of Internal Auditors

# Reliability and Culture



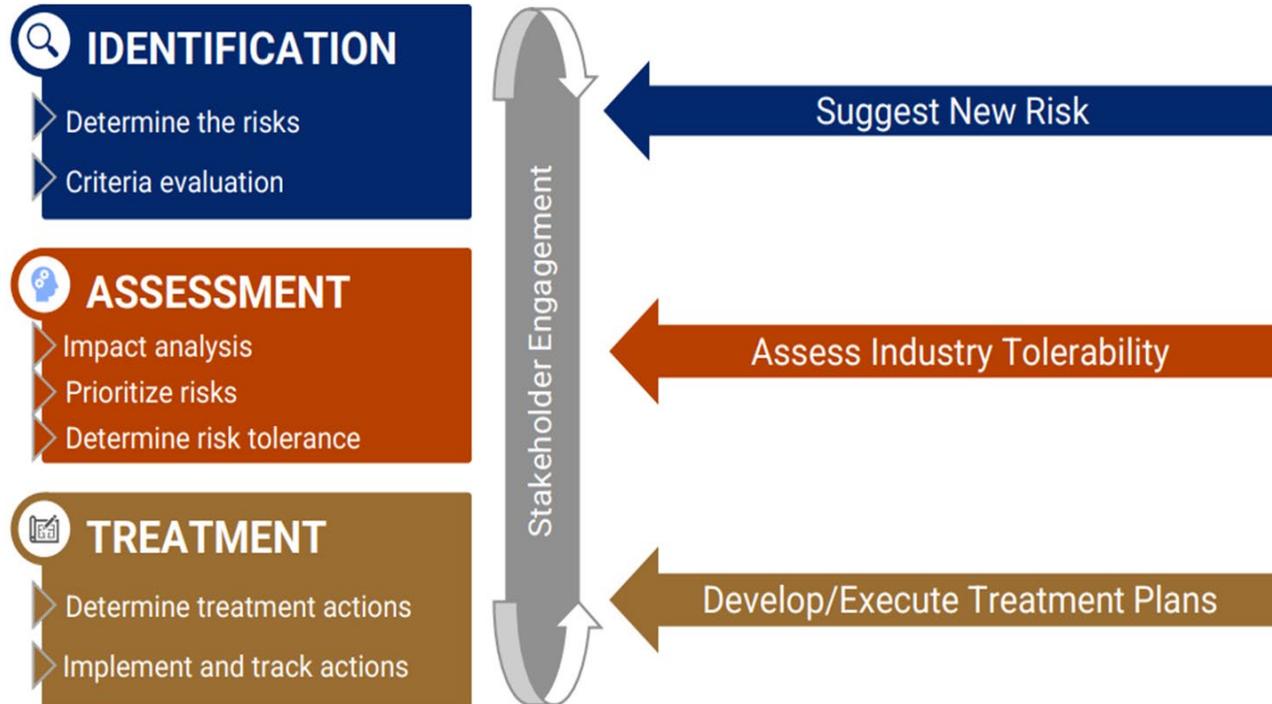
# Interconnection-wide View of Reliability

*"Electricity is an integral part of the fabric of modern life. WECC strengthens that fabric to preserve and improve society's future."*



# Regulatory Priorities

## WECC's Risk Management Program



**NERC**  
NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

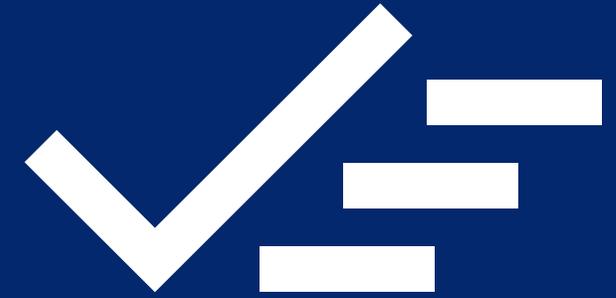
## 2026 ERO Enterprise Compliance Monitoring and Enforcement Program Implementation Plan

October 2025

RELIABILITY | RESILIENCE | SECURITY

## Risk Based Oversight – Intentionally Elevated

- Strategic
- Risk Priorities
- Culture
- Internal Control Assessments
- Patterns and Performance
- Compliance Posture



# Risk-based Approach and Reduction of Risks to BPS



# Myths vs. Reality

## Reliability Assurance Initiative

### Purpose of the Reliability Assurance Initiative (RAI)

The RAI is to identify and implement changes that enhance the effectiveness of the Electric Reliability Organization (ERO) compliance and enforcement program to avoid cascading events and the resulting major loss of load. The foundational principles of the RAI are that:

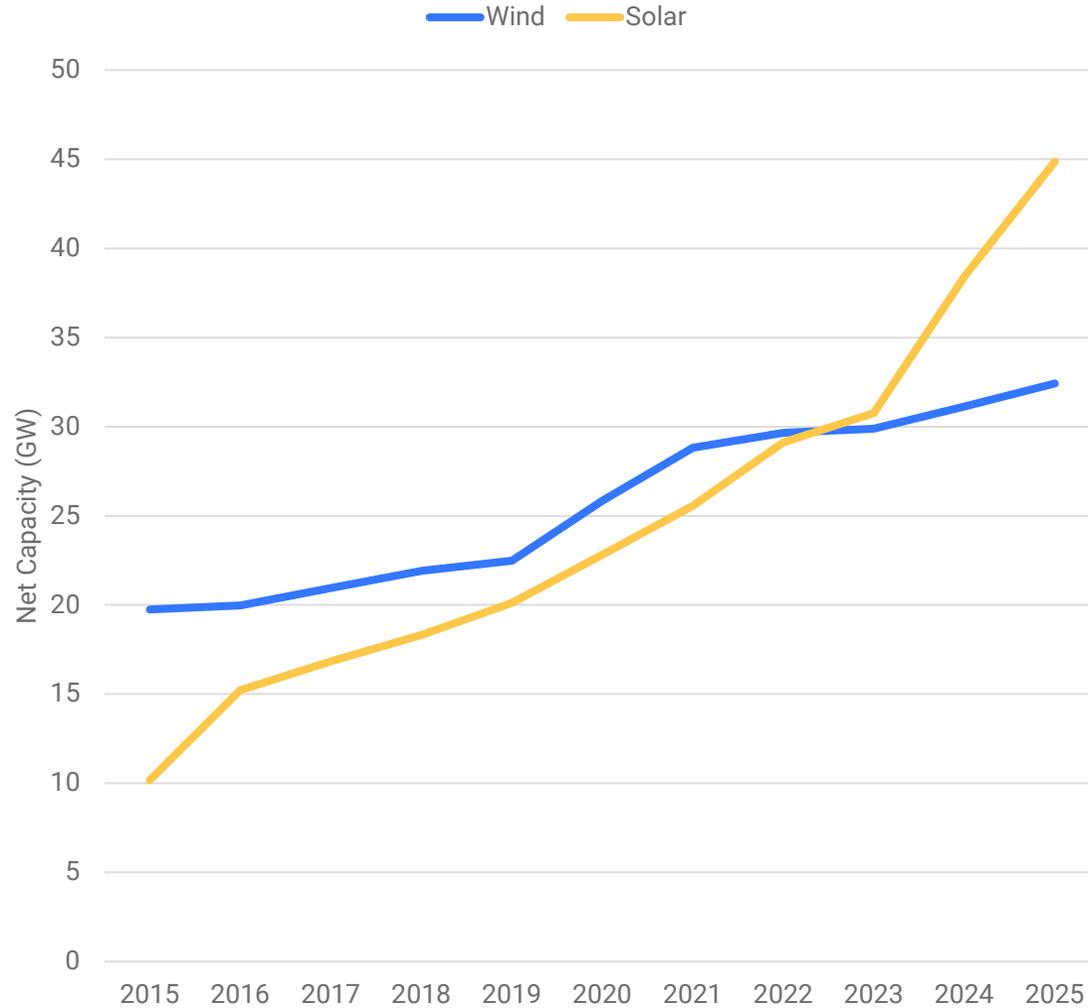
- It is not practical, effective or sustainable for the ERO Enterprise and Registered Entities to monitor and control all compliance to the same degree.
- It is not practical, effective, or sustainable for the ERO Enterprise and Registered Entities to treat all findings and discrepancies, as violations triggering the same degree of enforcement and evidentiary documentation.

## Emphasis: *Deliver the Value Proposition*

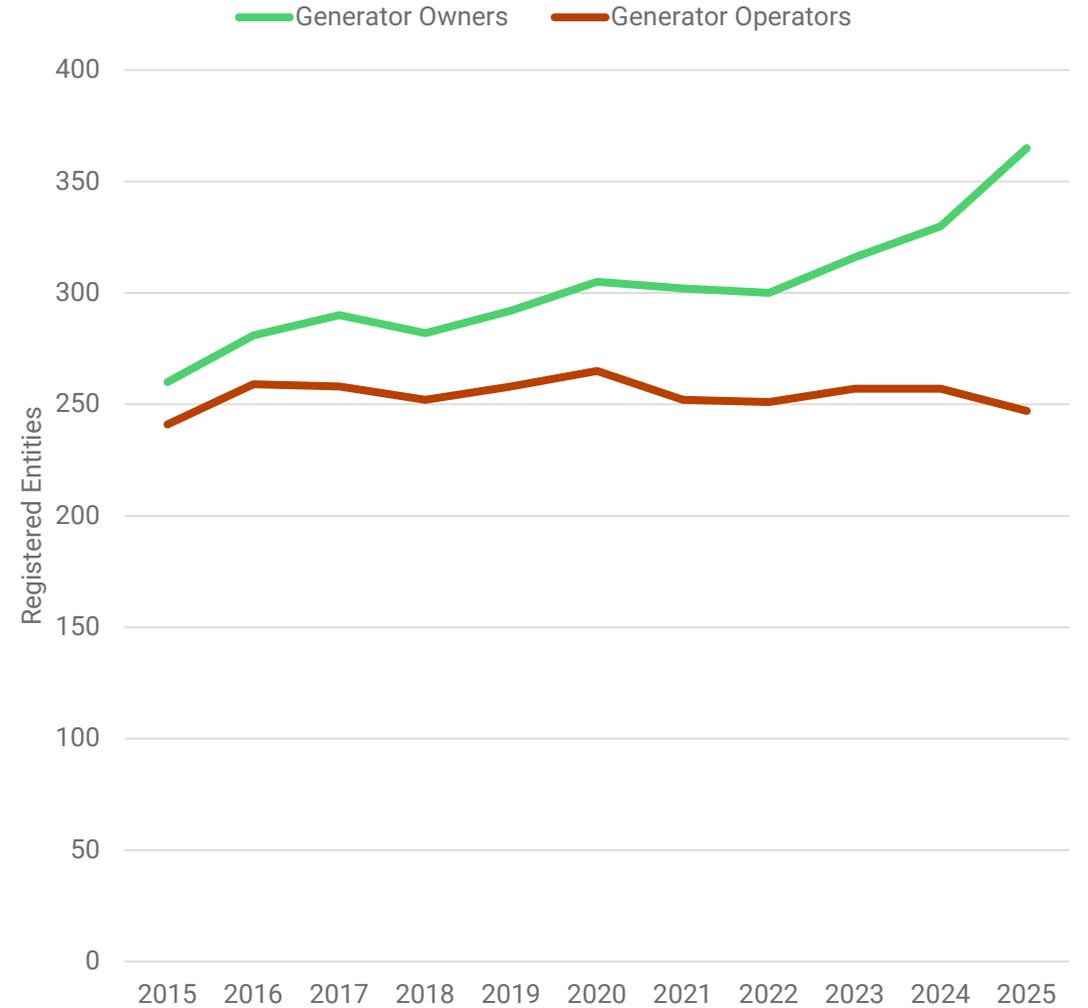
- Investment in performance, strong internal controls, and ability to mitigate risk matter
- Those inputs inform CMEP experiences and activities, and entities can articulate a differentiated experience based on that investment

# Not Slowing Down

### IBR Installed Capacity in Western U.S.



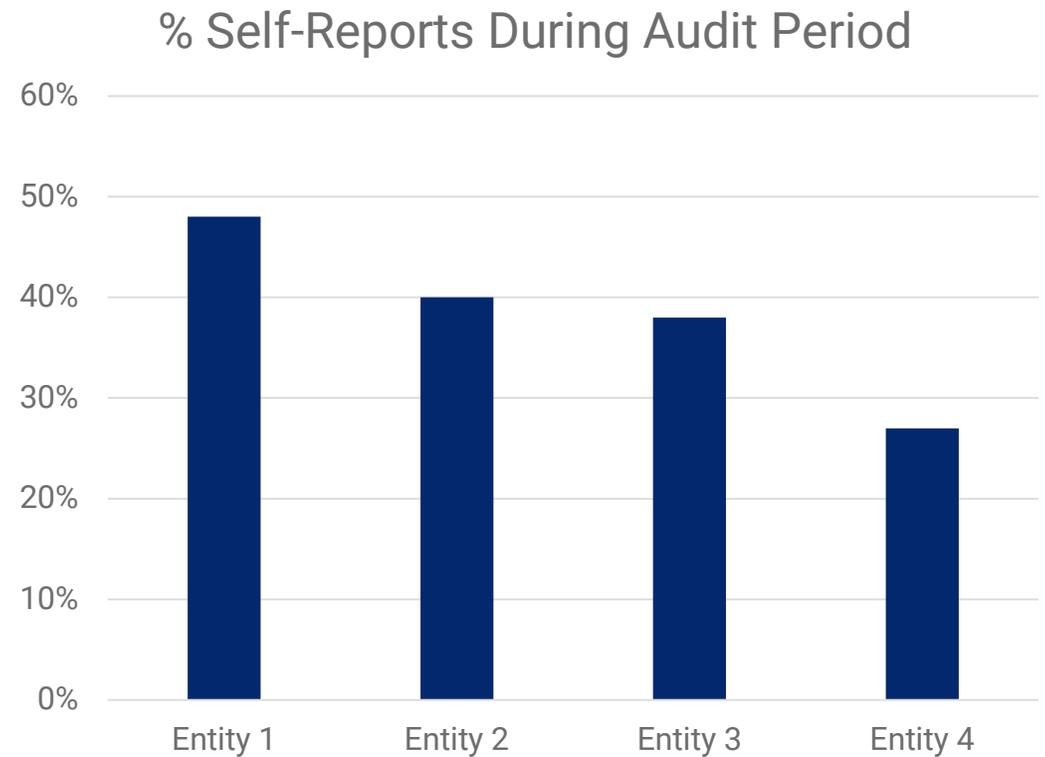
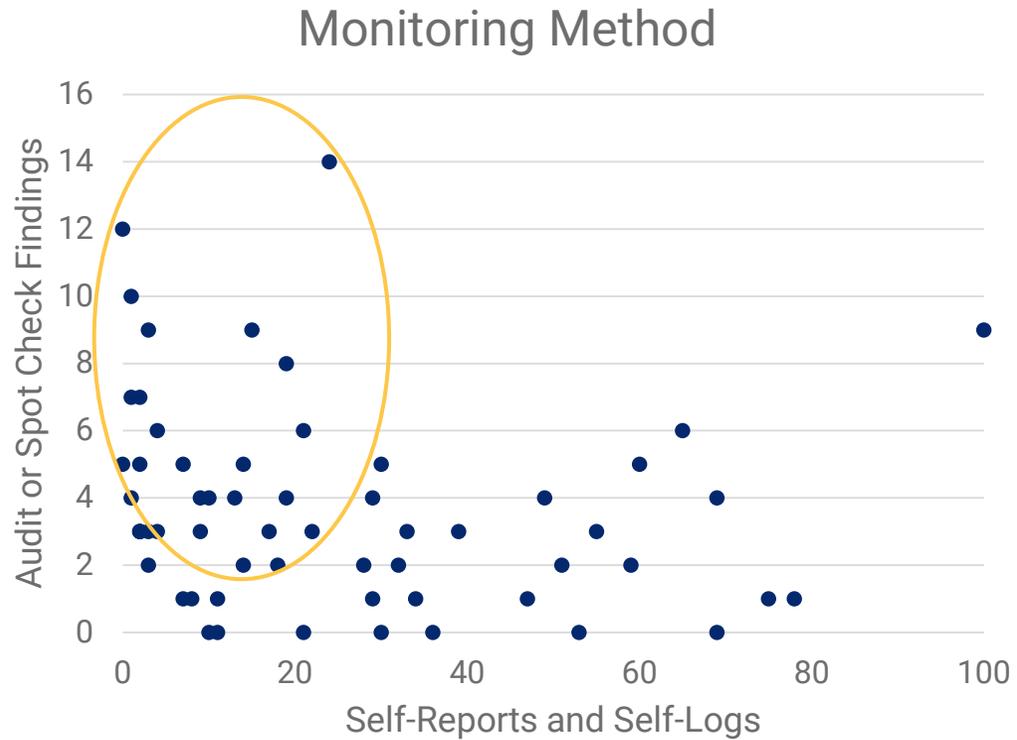
### WECC Registered Entities



# Regional Entity Perspective



# Trends: Reliance on WECC



# Trends: Time to Discover and Mitigate Noncompliance

Months to...	Requirement	Stronger Entities (Top 20%)	Average Entities (Median)	Weaker Entities (Bottom 20%)
Discover	CIP-003 R2	<1	10	36
	CIP-010 R1	<1	4	27
	FAC-008 R6	16	40	92
	PRC-005 R3	4	21	57
Mitigate	CIP-003 R2	3	5	11
	CIP-010 R1	2	7	12
	FAC-008 R6	5	7	15
	PRC-005 R3	3	8	15

# Internal Compliance Program (ICP)

- An effective ICP—
  - Helps prevent and detect noncompliance
  - Promotes a culture of reliability
- Programs not one-size-fits-all
  - Formal and centralized
  - Informal and decentralized
- [ICP Self-Assessment](#)



**Internal Compliance Program  
Self-Assessment**  
August 2025

An effective Internal Compliance Program (ICP) helps entities prevent and detect noncompliance and promote a culture of commitment to reliability and security. The following self-assessment is based on WECC observations during CMEP engagements. Consider these prompts when establishing and evaluating your ICP.

Effective ICPs are as diverse as the entities that adopt them. Decisions about what is appropriate for your entity will depend on many factors, including the scale and scope of your operations and your organizational structure. Each section of this self-assessment includes examples that distinguish between what may be appropriate for entities with high (HIR) or low (LIR) inherent risk and centralized (CM) or decentralized (DM) organizational models.

*This document is for informational purposes only and is not a basis for enforcement determinations.*

**Policies and Procedures**

Prompt	Examples
Do you reinforce policies and procedures with operational internal controls?	<p>(HIR) Establish a change control board with oversight over operations technology resources. Adopt a charter or policy to establish and define the board's authority.</p> <p>(LIR) Assign standard owners, compliance officers, or CIP Senior Managers to provide final approval of changes affecting areas of NERC compliance.</p>
Do you make documentation accessible and measure awareness?	<p>(CM) Provide a central repository for all policies, procedures, and related documentation that is easily accessible to the appropriate staff. Include feedback mechanisms in regular training to measure awareness of the repository.</p> <p>(DM) Ensure individual business units provide easy access for staff to relevant policies, procedures, and related documentation. Require managers to provide regular training on priority knowledge and skills.</p>

ELECTRIC RELIABILITY AND SECURITY FOR THE WEST

## Conclusions and Takeaways

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- CMEP activities and outreach/feedback are tailored to specific entities, entity types, or categories of entities based on risk and performance
- Entities should assess risks and ICPs themselves



**ENGAGE WITH WECC**





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