Oversight Trends Update

*Data as of February 1, 2025*

Highlights

- A self-certification activity posted in February 2025 for 290 entities on 16 requirements associated with Reliability Risk Priorities (RRP). WECC will issue follow-up requests for a subset of responses to better assess internal controls and compliance programs.
- The Reliability & Security Workshop is March 25-27, 2025, in Tempe, Arizona. It will cover topics including standards development and implementation, internal controls and compliance programs, audit preparation, and WECC program updates.
- NERC and FERC are conducting the annual CE and FFT assessment to review program effectiveness and application across the ERO Enterprise. WECC provided information about disposition of noncompliance and mitigation review in support of this assessment.
- FERC issued an order in December 2024 accepting the Five-year ERO Performance Assessment. WECC will continue to work within the ERO Enterprise to streamline CE processing and support other objectives identified in the Assessment.

Registration Changes

Through the Organization Registration and Certification Program (ORCP), WECC identifies and registers users, owners, and operators responsible for meeting the requirements of mandatory NERC Reliability Standards.

Observation: New entity registration requests and footprint changes accepted by WECC in the last 12 months amounted to over 15,000 MVA of inverter-based resources (IBR).


Year Ending Feb 2025
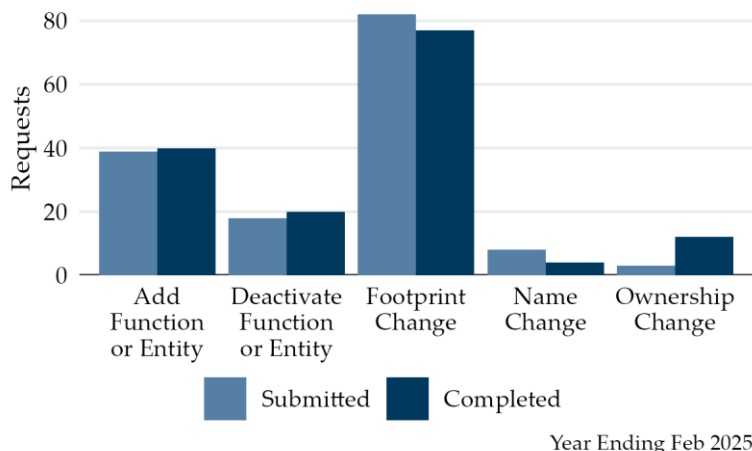
Registered Entities as of Feb 2025			
U.S.	Alberta	BC	Mexico
438	1	31	1

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Most-Reported Requirements

Many factors drive self-report frequency: the strength of industry internal controls, implementation of new standard versions, and compliance program issues affecting multiple related entities. These trends help WECC identify areas for outreach and engagement.

Observation: A majority of CIP noncompliance is discovered and remediated within 4 months. Timely detection and correction reduces reliability risk posed by noncompliance. WECC's November 2024 Compliance Fundamentals online seminar included outreach on protection systems for low inherent-risk entities, given an increasing trend in self-reports by these entities.
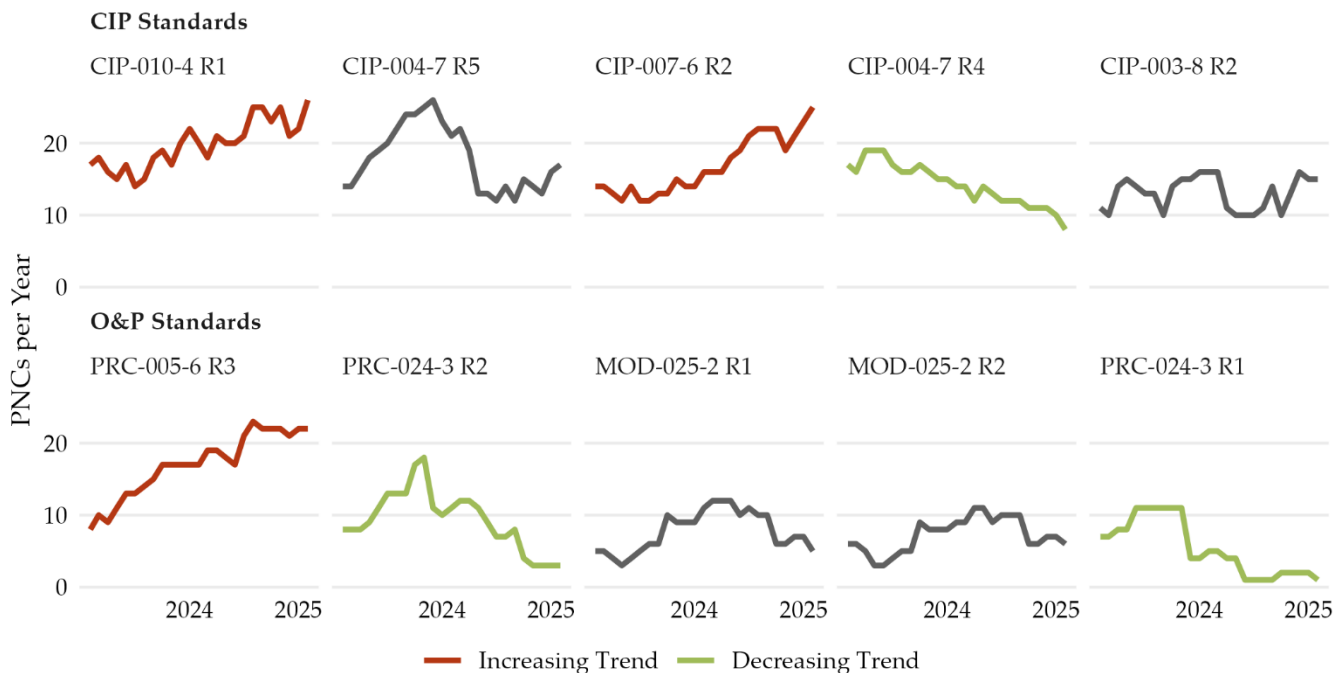
Legend

|			
CIP-010-4 R1	Configuration monitoring	PRC-005-6 R3	Protection system maintenance
CIP-004-7 R5	Access revocation	PRC-024-3 R2	Generator voltage protection settings
CIP-007-6 R2	Security patch management	MOD-025-2 R1	Real power capability verification
CIP-004-7 R4	Access management program	MOD-025-2 R2	Reactive power capability verification
CIP-003-8 R2	Low impact BCS cyber security plans	PRC-024-3 R1	Generator frequency protection

Most-Monitored Requirements

WECC frequently selected the requirements below for monitoring engagements in the last 12 months, including audits, spot-checks, and self-certification. Selection reflects WECC and ERO Enterprise risk priorities as well as entity-specific concerns. Risks in bold are identified in the WECC Risk Register.

Risk / Requirements	High Inherent Risk Entities	Medium Inherent Risk Entities	Low Inherent Risk Entities
Cold weather preparedness EOP-011-4 R7, R8 EOP-012-2 R1, R2, R4, R5, R6	X		X
Misconfiguration PRC-027-1 R3	X		
Modeling quality issues MOD-032-1 R1	X		
Perimeter breach CIP-005-7 R1, R2, R3		X	
Communications between control centers CIP-012-1 R1		X	
Physical security CIP-003-8 R2			X

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Enforcement Inventory

The inventory includes potential noncompliance (PNC) pending disposition with NERC or the BCUC. Inventory size affects processing times, risk responsiveness, outreach, and resource management.
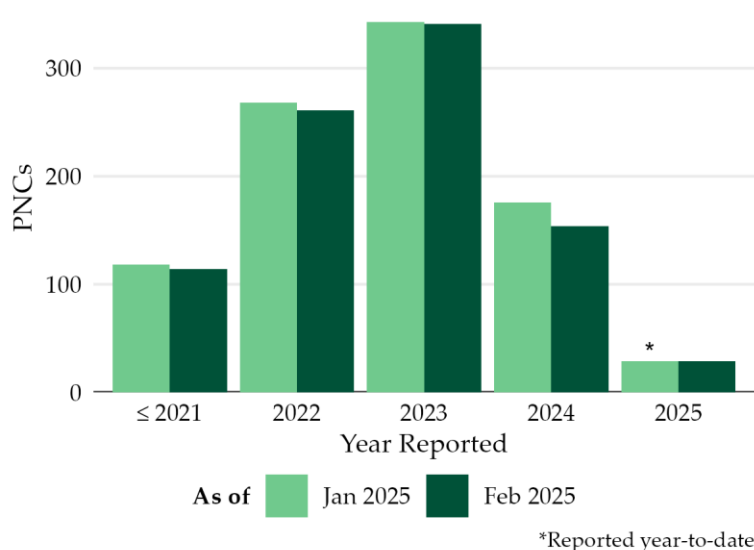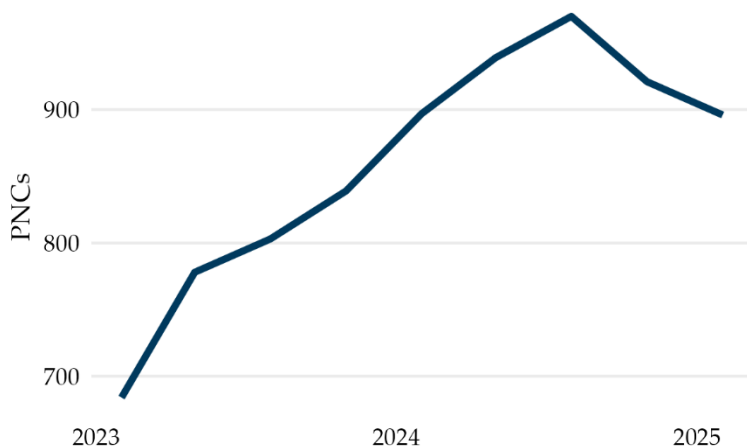

Inventory Age

The ERO Enterprise continues to focus on reducing the volume of the oldest open inventory. WECC prioritizes cases received before 2022 and in 2024 for enforcement and mitigation processing.

Observation: In the last 12 months, WECC disposed of 55% of noncompliance received in 2024.


*Reported year-to-date

Detection Time

Time required for an entity to identify noncompliance is a measure of the strength of detective controls. Typical intervals vary by standard and requirement.
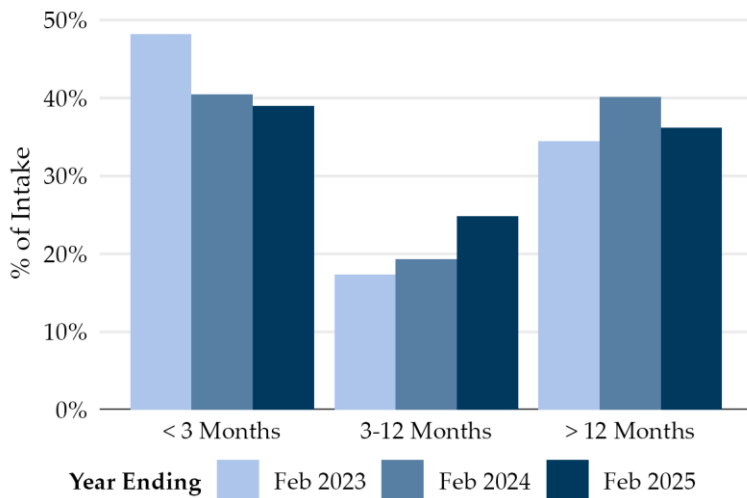
Disposition Methods

The appropriate disposition method for a case is based on risk and the complexity of the issue, mitigation, entity compliance history, and regulatory guidance.

Observation: Although many cases are complex, WECC processes 80% of noncompliance as a Compliance Exception (CE).
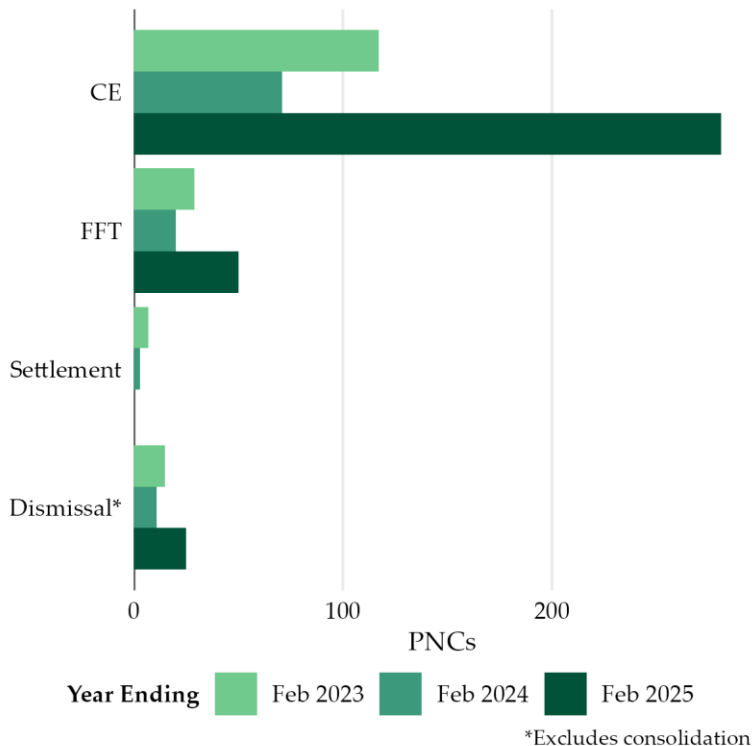
Mitigation Status

Mitigation includes remediation and prevention of recurrence. Entities must—

1. Prepare mitigation,
2. Submit for review by WECC,
3. Implement mitigation, and
4. Notify WECC of completion.

WECC verifies mitigation completion depending on risk, disposition method, compliance history, and other factors.