![WECC logo]

Oversight Trends Update
May 1, 2025

Highlights

- The March 2025 Reliability & Security Workshop hosted 445 attendees virtually and in-person in Tempe, Arizona. Sessions covered WECC and NERC program guidance, recommendations to strengthen entities' internal compliance programs and internal controls, and presentations by entities sharing their experiences and practices.
- A monthly webinar series beginning May 2025 targets candidates for registration as Category 2 IBR Generator Owners and Operators. The webinars explain the registration process and help representatives of these entities connect with WECC staff before mandatory compliance begins in May 2026. This is a component of the ERO Enterprise IBR registration initiative and complements NERC outreach for these entities.
- The NERC Board of Trustees formed a Modernization of Standards Processes and Procedures Task Force (MSPPTF) in February 2025 to re-envision more effective and efficient development of standards while balancing stakeholder interests. The group will present its final recommendations in February 2026.

Registration Changes

The Organization Registration and Certification Program (ORCP) identifies and registers users, owners, and operators responsible for meeting the requirements of mandatory NERC reliability standards. WECC also recommends BC entities for registration with the British Columbia Utilities Commission (BCUC).

WECC Entities as of May 2025	
U.S.	457
Alberta	1
BC	31
Mexico	1
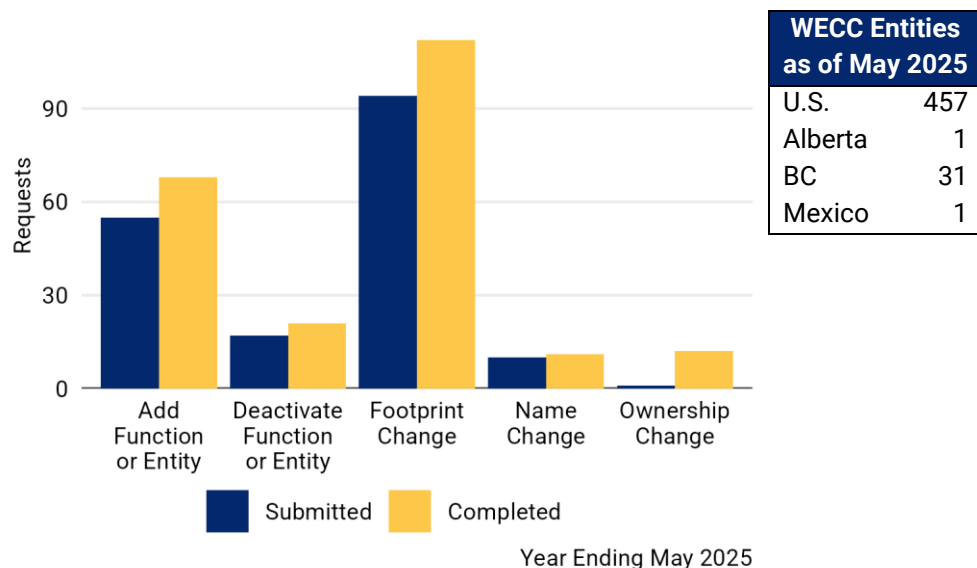
Most-Reported Requirements

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: High inherent risk entities make up 77% of self-reports for top critical infrastructure protection (CIP) requirements, while low inherent risk entities make up 54% for top operations and planning (O&P) requirements. This reflects the prevalence of IBR-related O&P issues and represents a major shift from previous years.
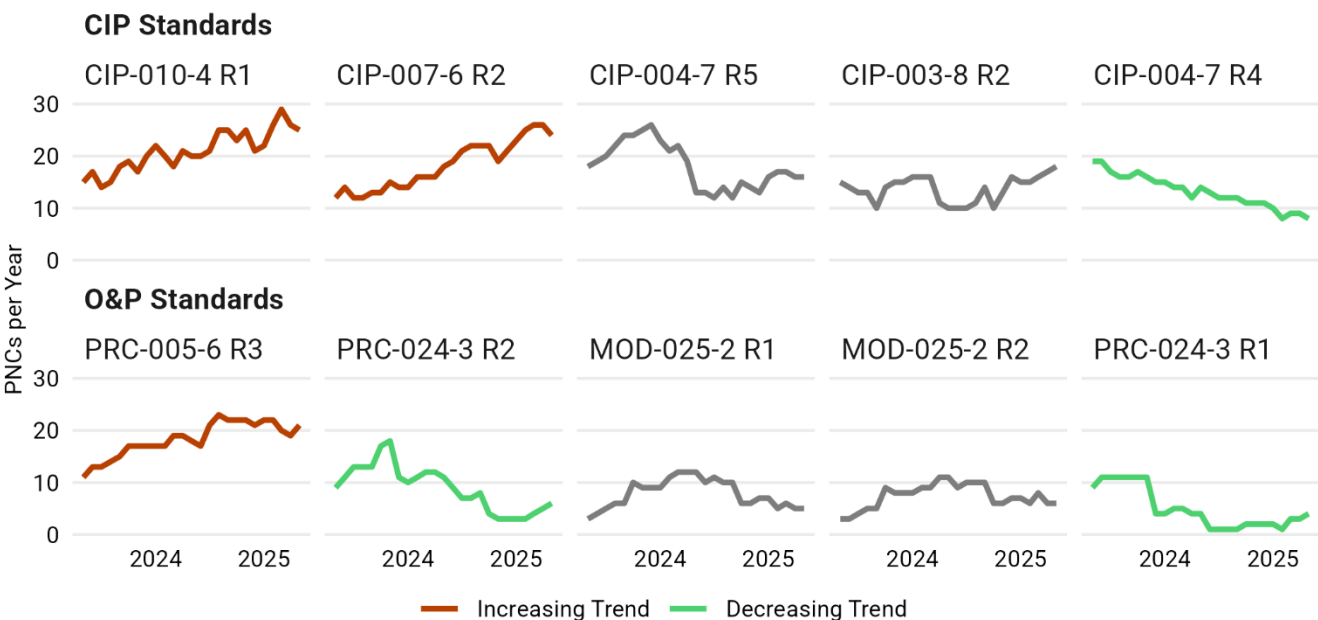
Legend

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

Most-Monitored Requirements

WECC frequently selected the requirements below for monitoring engagements in the last 12 months. Top requirements are shown for entities with high (HIR), medium (MIR), and low (LIR) inherent risk. Selection reflects WECC and ERO Enterprise risk priorities as well as entity-specific concerns. Risks are identified in the WECC Risk Register.

Risk / Requirements	Audits and Spot Checks			Self-Certification		
	HIR	MIR	LIR	HIR	MIR	LIR
Malware and zero-day exploits CIP-007-6 R2, R3	X					
Perimeter breach and perimeterless operational technology CIP-005-7 R1, R2, R3 CIP-012-1 R1	X	X				
Cold weather preparedness EOP-011-4 R7, R8 EOP-012-2 R1, R4, R5			X	X		
Physical security CIP-003-8 R2			X			
Inadequate interconnection requirements and commissioning FAC-002-4 R2					X	X
Modeling quality issues MOD-027-1 R4					X	X
Performance and validation issues PRC-024-3 R3, R4					X	X
Planning case accuracy FAC-001-4 R4					X	X

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.
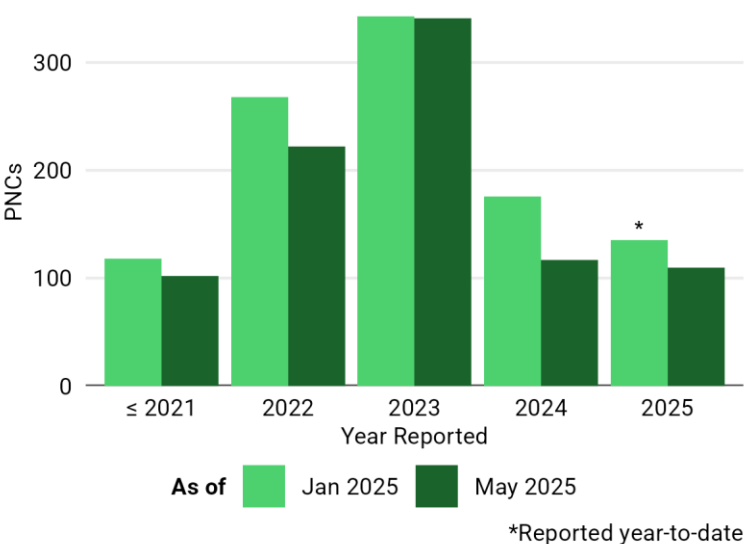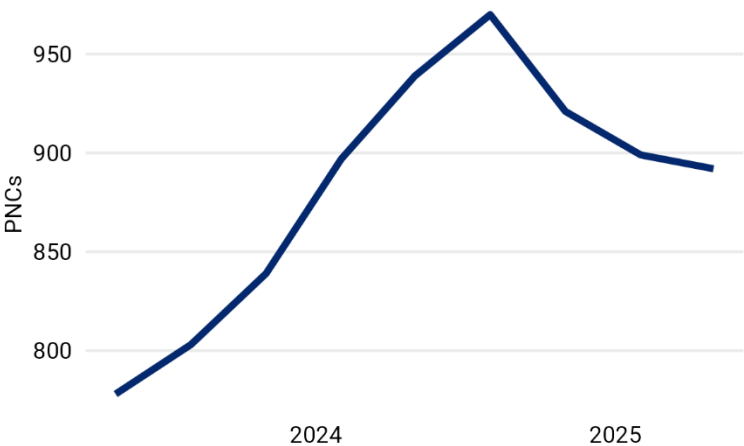

Inventory Age

The ERO Enterprise continues to focus on reducing the volume of the open inventory. WECC prioritizes both the oldest and newest cases for enforcement and mitigation processing.

Observation: WECC has processed 69% of all PNCs reported in 2024 and 19% of PNCs reported so far in 2025.

As of   Jan 2025   May 2025

*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.

Year Ending   May 2023   May 2024   May 2025
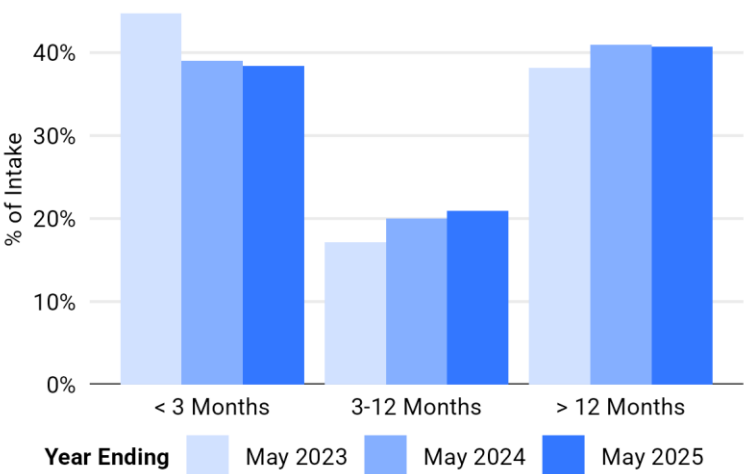
Disposition Methods

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: WECC significantly increased disposition output in the year ending May 2025, processing nearly five times more Compliance Exception (CE) and three times more Find, Fix, Track, and Report (FFT) dispositions with applicable governmental authorities than in the previous 12-month period.

Year Ending ■ May 2023 ■ May 2024 ■ May 2025

*Excludes consolidation
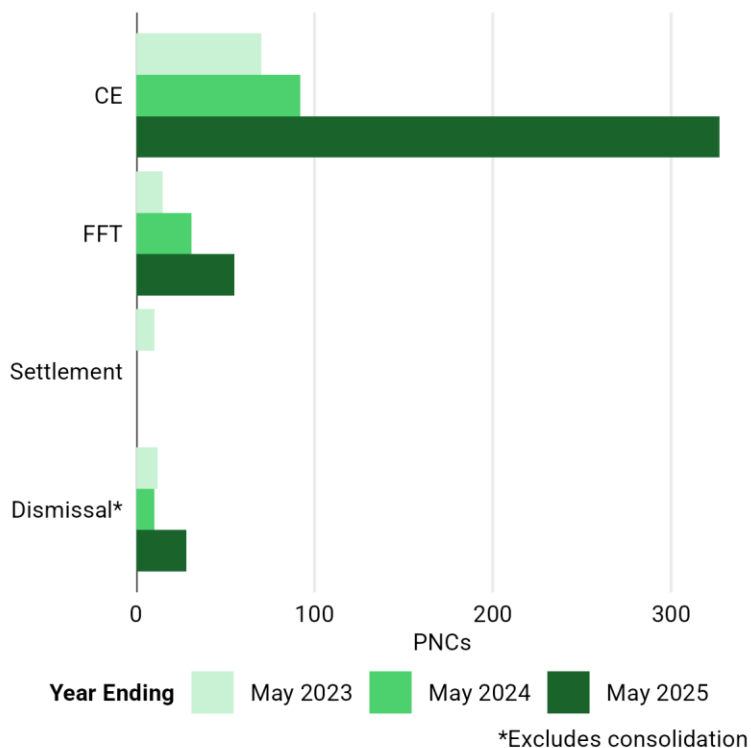
Mitigation Status

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.

As of ■ May 2023 ■ May 2024 ■ May 2025