Oversight Trends Update

Data as of August 1, 2025

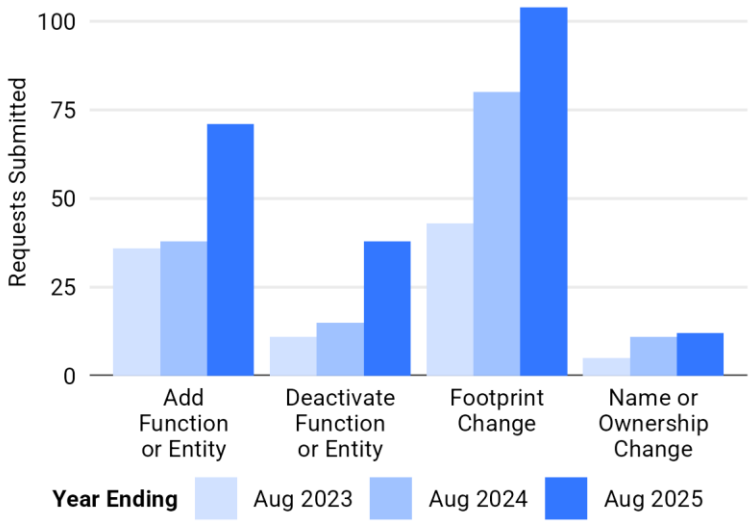
Highlights

- WECC has begun conducting self-certifications for new Inverter-based Resource (IBR) owners and operators. The engagements follow outreach at registration to ensure entities have a strong reliability and security foundation. Active participation in this outreach improves the self-certification experience for entities and WECC.
- Recent monitoring engagements have used entity internal audit and other independent reviews as evidence to assess compliance and internal controls. WECC expects to increasingly rely on these sources to plan and conduct differentiated monitoring.
- Building on outreach from the March Reliability & Security Workshop, WECC developed a self-assessment in August to help entities establish effective internal compliance programs (ICP). WECC will continue to collaborate with industry to identify and share ICP best practices.
- The ERO Enterprise deployed Align Release 7.3 in July. This update includes bug fixes and new functionality for applicability attestations, Periodic Data Submittals (PDS), and self-certification.

Registration Changes

The Organization Registration and Certification Program (ORCP) 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).

Observation: Battery energy storage systems (BESS) make up an increasing share of generation additions. In the last year, WECC received requests to add 6,200 MVA of BESS capacity to Generator Owner registrations, compared to 7,300 MVA of solar capacity.

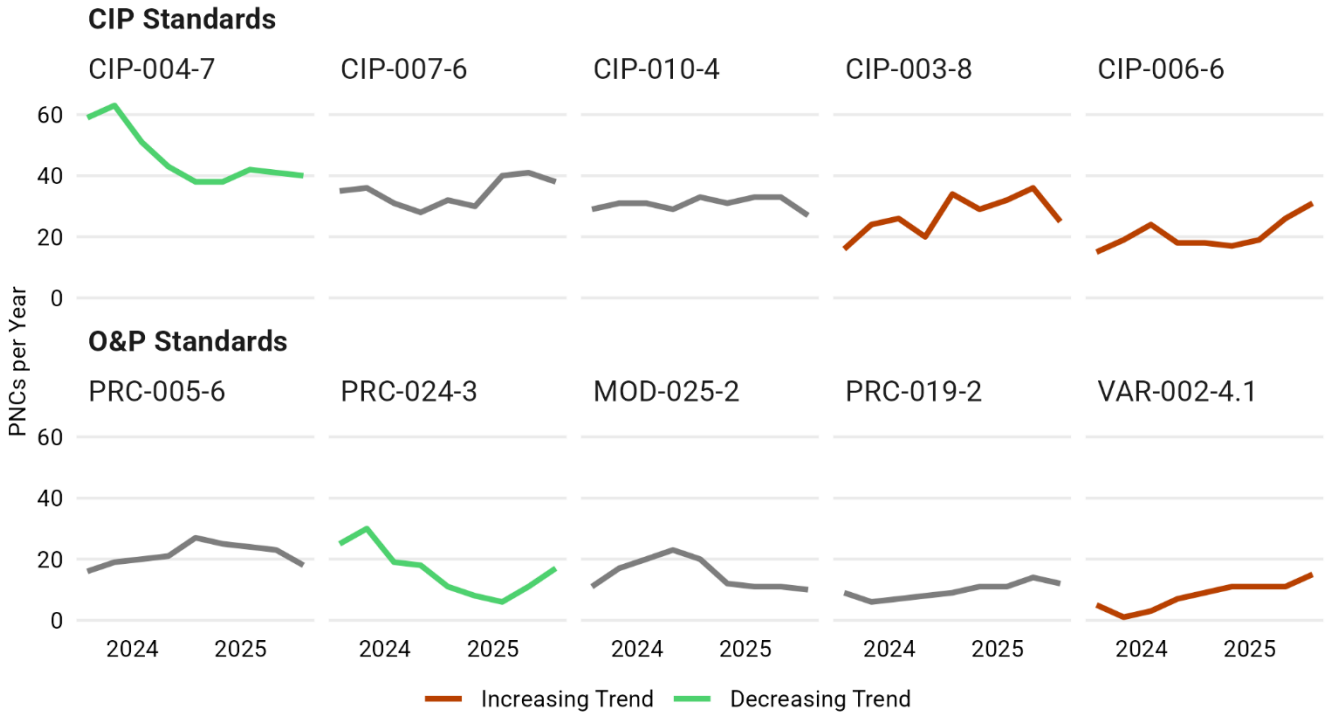


Entities as of Aug 2025				
	US	**BC**	**AB**	**MX**
BA	34	1		
DP/DPUF	79	17		
GO	354	18		
GOP	252	18		
PC	32	1		
RC	2	1		
RP	50	2		
TO	85	4		
TOP	51	3		
TP	66	3		
TSP	34	2		
ISO			1	
Entities	**472**	**31**	**1**	**1**

Most-Reported Standards

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: Self-reports related to security plans for low impact Bulk Electric System (BES) cyber systems have continued to increase since requirements were first introduced under CIP-003-7 in 2020. A majority of noncompliance is due to inadequate physical security controls or risk mitigation for transient cyber assets. WECC has focused recent monitoring in this area for low inherent risk entities to better assess and address the issues.



Legend

CIP-004-7	Personnel and training
CIP-007-6	System security management
CIP-010-4	Configuration change management
CIP-003-8	Security management controls
CIP-006-6	Physical security of BES Cyber Systems
PRC-005-6	Protection system maintenance
PRC-024-3	Frequency and voltage protection settings
MOD-025-2	Generator verification and data reporting
PRC-019-2	Generator coordination
VAR-002-4.1	Maintaining network voltage schedules

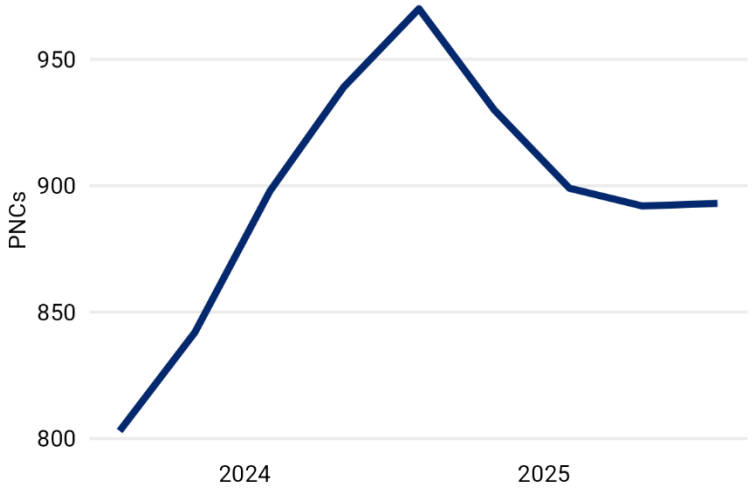
Most-Monitored Risk Areas

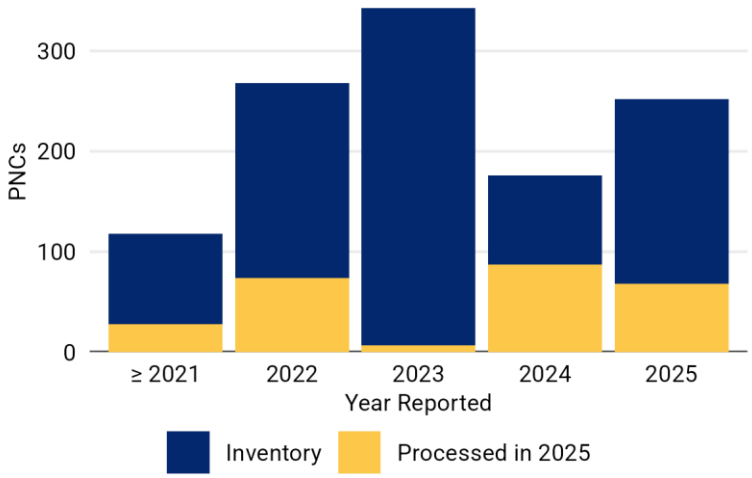
WECC prioritized these areas in monitoring engagements over the last 12 months. Objectives for each engagement are based on assessment of the individual entity in the context of regional and ERO Enterprise priorities, as described in the Risk Register. These priorities vary for entities with high (HIR), medium (MIR), and low (LIR) inherent risk.

Risk Areas / Standards	Audits and Spot Checks			Self-Certification		
	HIR	MIR	LIR	HIR	MIR	LIR
Malware and zero-day exploits CIP-007-6	X	X				
Perimeter breach and perimeterless operational technology CIP-005-7, CIP-012-1	X	X				
Unauthorized software & hardware CIP-010-4	X					
Physical security CIP-006-6		X				
Cold weather preparedness EOP-011-4, EOP-012-2			X	X		
Malware CIP-003-8			X			
Performance and validation issues PRC-024-3					X	X
Inadequate interconnection requirements and commissioning FAC-002-4					X	X
Modeling quality issues MOD-027-1					X	X
Planning case accuracy FAC-001-4					X	X

Enforcement Inventory

The inventory is made up of potential noncompliance (PNC) under review by WECC and pending disposition. Inventory size affects processing times, risk responsiveness, outreach, and resource management.





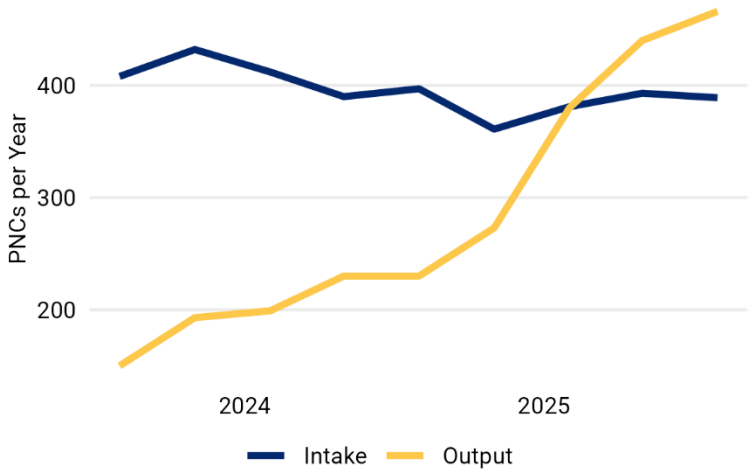
Inventory Age

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

Intake and Output

WECC monitors long-term trends in PNC intake and output as a measure of the effectiveness of the enforcement process to identify, address, and prevent the future recurrence of risks associated with noncompliance.

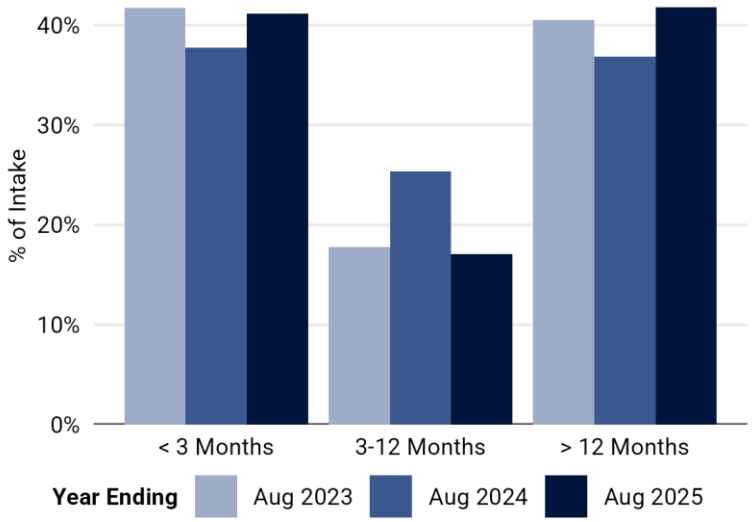
Observation: Efforts to strengthen enforcement capabilities allowed WECC to double output in the last 12 months, reducing inventory by 8%.



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.

Observation: While the frequency of CIP-003-8 self-reports has increased, average detection time has improved from nine months in 2023 to less than one month today.



Mitigation Time

Entities are encouraged to mitigate issues promptly after discovery. Mitigation includes actions and controls to reduce risk, return to compliance, and prevent future recurrence.