



# Oversight Trends Update

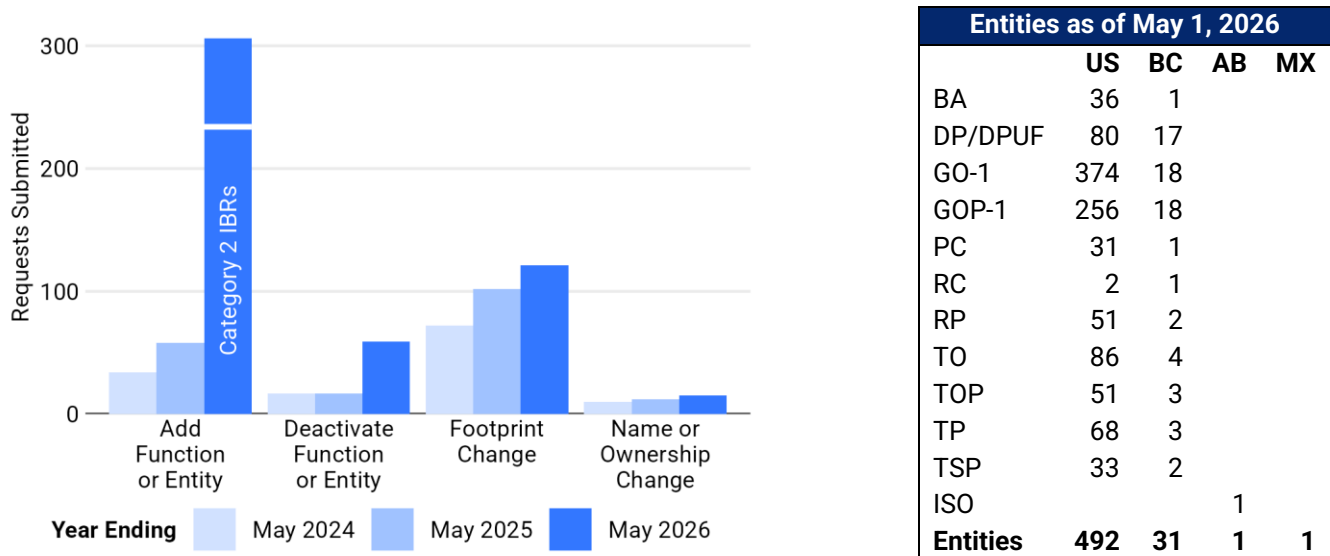
Data as of May 1, 2026

## Highlights

- WECC has processed requests to register nearly 10 GVA of Category 2 inverter-based resources (IBR) effective May 15, 2026. This includes 144 new entities and 61 function additions for existing entities.
- In reviewing self-certification for 2025, WECC has seen many entities demonstrate weak controls and processes in their oversight of third parties in protection of low-impact BES Cyber Systems as required by CIP-003-9. This will continue to be a priority monitoring focus. Second, WECC identified several recommendations to enhance risk mitigation as required by EOP-012-3, including Extreme Cold Weather Temperature calculation, cold weather maintenance and testing, and training implementation and effectiveness review. WECC shares these recommendations with applicable entities directly. The recommendations will also be the topic of upcoming outreach.
- The NERC Rules of Procedure empower WECC to initiate monitoring or enforcement actions with entities that fail to provide requested data. In the first part of 2026, WECC pursued action under these provisions in three separate instances. WECC considers timely and responsive entity engagement when carrying out monitoring and enforcement activities.

## Registration Requests

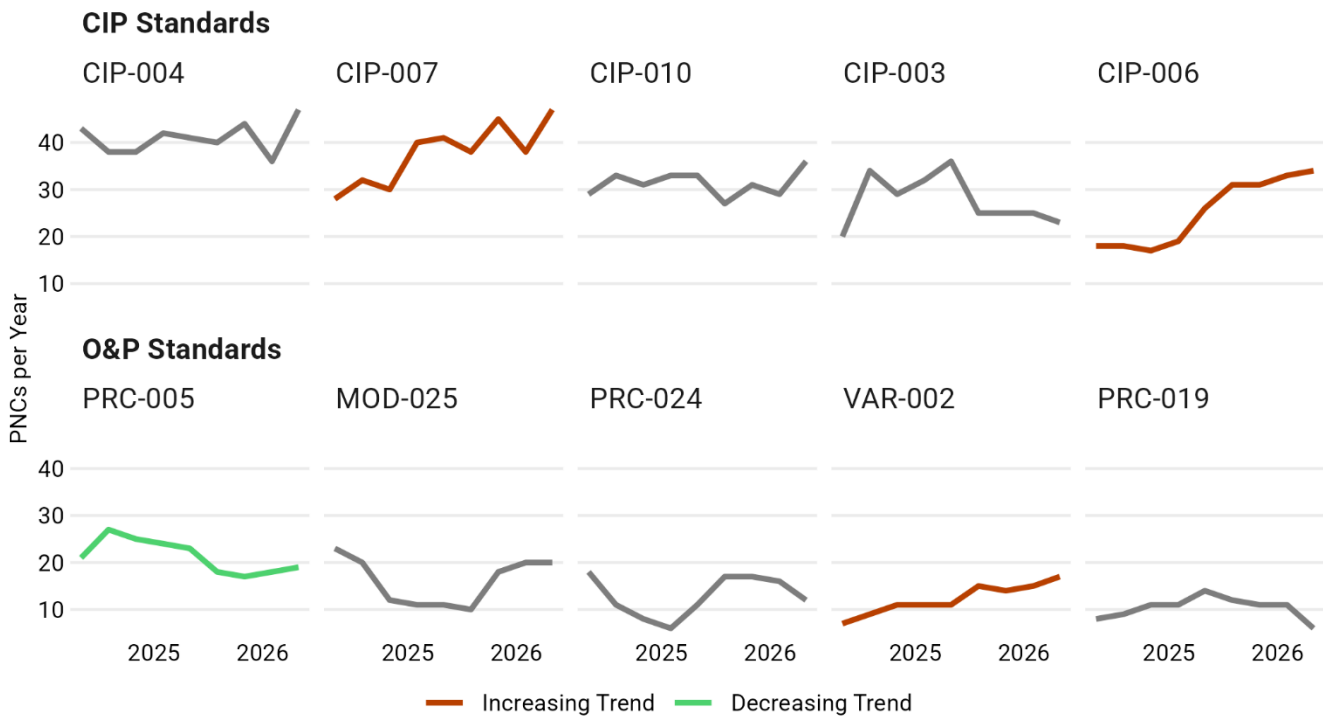
The Organization Registration and Certification Program (ORCP) registers users, owners, and operators responsible for meeting the requirements of mandatory NERC Reliability Standards. WECC also recommends entities in British Columbia for registration with the British Columbia Utilities Commission (BCUC).



## 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:** CIP self-reports have increased 50% in the last four years, with notable upward trends in noncompliance related to patch management (CIP-007-6 R2) and the physical security of BES Cyber Systems (CIP-006-6 R1, R2). The ERO Enterprise identified these risks as areas of focus in the [2026 CMEP Implementation Plan](#).



**Legend**

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



## Most-monitored Risk Categories

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

Risk Category / Related Standard(s)	Audits and Spot Checks			Self- Certification		
	HIR	MIR	LIR	HIR	MIR	LIR
<b>Asset/System Management and Maintenance</b> CIP-003, CIP-007, CIP-010	X	X	X	X	X	X
<b>Identity Management and Access Control</b> CIP-005, CIP-010	X	X				
<b>Asset/System Identification</b> CIP-002, TPL-001	X			X	X	X
<b>Emergency Operations Planning</b> EOP-011, EOP-012	X		X	X	X	X
<b>Asset/System Physical Protection</b> CIP-003		X	X	X	X	X

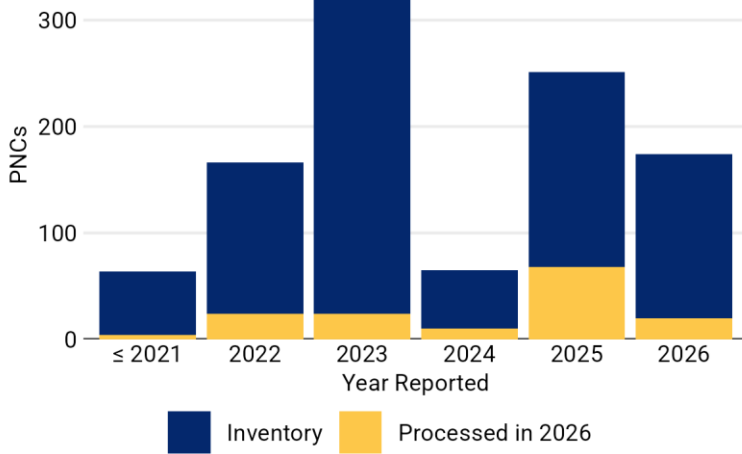
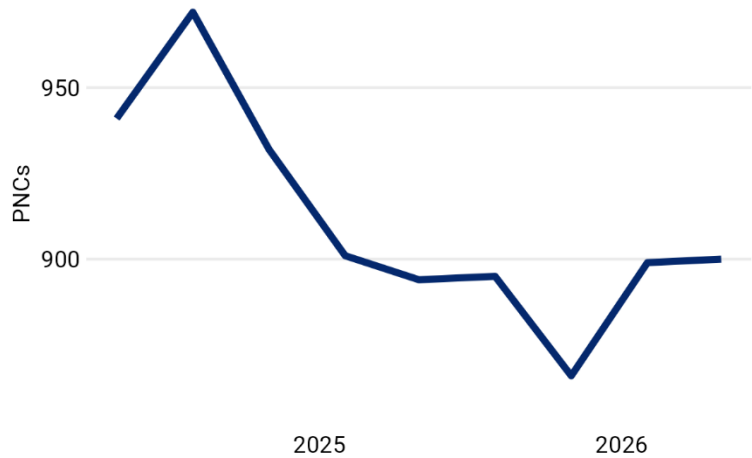
### Legend

CIP-002	BES Cyber System categorization	CIP-010	Configuration change management
CIP-003	Security management controls	EOP-011	Emergency operations
CIP-005	Electronic security perimeters	EOP-012	Cold weather preparedness and operations
CIP-007	System security management	TPL-001	Transmission system planning performance



## 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.



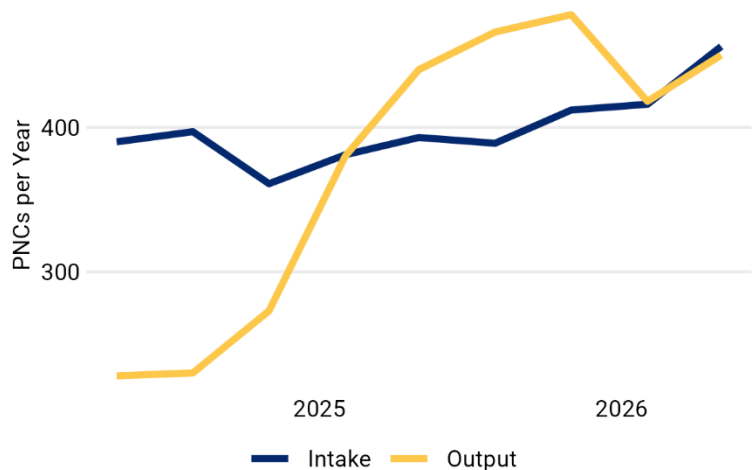
## Inventory Age

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

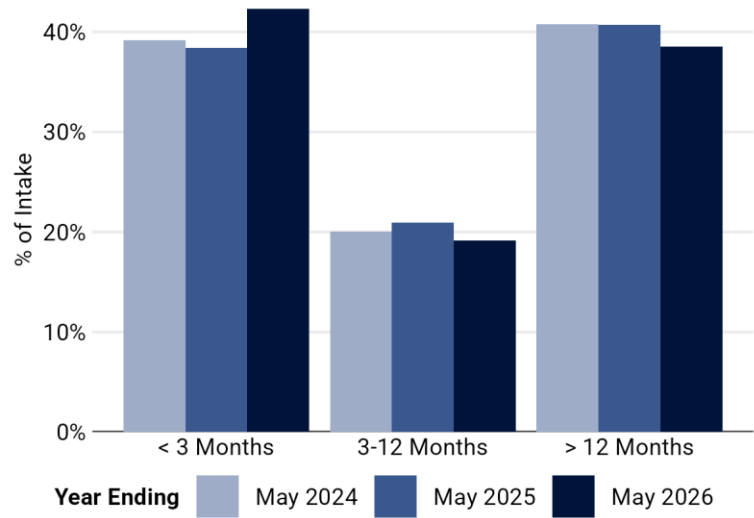
WECC monitors long-term trends in PNC intake and output as a measure of the effectiveness of the enforcement process to identify, address, and prevent the future recurrence of risks associated with noncompliance.

**Observation:** WECC processes 45% of all noncompliance within 180 days of intake.



## 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.



## Mitigation Time

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

