
**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**North American Electric Reliability)
Corporation)**

Docket No. RD20-2-000

**INFORMATIONAL FILING OF THE NORTH AMERICAN ELECTRIC RELIABILITY
CORPORATION REGARDING STANDARDS DEVELOPMENT PROJECTS**

Lauren Perotti
Senior Counsel
Marisa Hecht
Counsel
North American Electric Reliability Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
lauren.perotti@nerc.net
marisa.hecht@nerc.net

*Counsel for the North American Electric
Reliability Corporation*

December 15, 2021

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Pursuant to paragraph 5 of the Order Directing Informational Filings Regarding NERC Standard Drafting Projects,¹ the North American Electric Reliability Corporation (“NERC”)² hereby submits to the Federal Energy Regulatory Commission (“FERC” or the “Commission”) an informational filing regarding one active Critical Infrastructure Protection (“CIP”) standard development project: (1) Project 2016-02 – Modifications to CIP Standards (“Project 2016-02”).³ Project 2016-02 focuses on modifications to the CIP Reliability Standards to incorporate applicable protections for virtualized environments. This informational filing provides an update to the current schedule for Project 2016-02.

I. BACKGROUND

In the February 20 Order, the Commission directed NERC to submit, within 30 days of the issuance of the Order, an informational filing that includes project schedules for Projects 2016-02 and 2019-02.⁴ The Commission stated that these schedules should include the status of the projects, interim target dates, and the anticipated filing date for new or modified Reliability

¹ *N. Am. Elec. Reliability Corp.*, “Order Directing Informational Filings Regarding NERC Standard Drafting Projects,” 170 FERC ¶ 61,109 (Feb. 20, 2020) [hereinafter February 20 Order].

² The Commission certified NERC as the electric reliability organization (“ERO”) in accordance with Section 215 of the FPA on July 20, 2006. *N. Am. Elec. Reliability Corp.*, 116 FERC ¶ 61,062 (2006).

³ Unless otherwise designated, all capitalized terms shall have the meaning set forth in the *Glossary of Terms Used in NERC Reliability Standards*, https://www.nerc.com/files/Glossary_of_Terms.pdf.

⁴ February 20 Order, *supra* note 1, at P 5. Project 2019-02 has concluded, and FERC approved the Reliability Standards revised as part of that project (CIP-004-7 and CIP-011-3) on December 7, 2021.

Standards. In addition, the Commission directed NERC to file quarterly informational status updates, beginning in June 2020, until NERC files new or modified standards with the Commission.⁵

NERC provided the initial informational filing regarding the schedules on March 19, 2020⁶ and five additional quarterly informational filings with updated schedules on June 19, 2020,⁷ September 17, 2020,⁸ December 15, 2020,⁹ March 15, 2021,¹⁰ June 15, 2021,¹¹ and September 15, 2021.¹² NERC also provided a supplemental informational filing on November 13, 2020.¹³ NERC filed for Commission approval the standards revised under Project 2019-02 (CIP-004-7 and CIP-

⁵ *Id.*

⁶ NERC, *Informational Filing of the North American Electric Reliability Corporation Regarding Standards Development Projects*, Docket No. RD20-2-000 (March 19, 2020).

⁷ NERC, *Informational Filing of the North American Electric Reliability Corporation Regarding Standards Development Projects*, Docket No. RD20-2-000 (June 19, 2020).

⁸ NERC, *Informational Filing of the North American Electric Reliability Corporation Regarding Standards Development Projects*, Docket No. RD20-2-000 (September 17, 2020).

⁹ NERC, *Informational Filing of the North American Electric Reliability Corporation Regarding Standards Development Projects*, Docket No. RD20-2-000 (December 15, 2020).

¹⁰ NERC, *Informational Filing of the North American Electric Reliability Corporation Regarding Standards Development Projects*, Docket No. RD20-2-000 (March 15, 2021).

¹¹ NERC, *Informational Filing of the North American Electric Reliability Corporation Regarding Standards Development Projects*, Docket No. RD20-2-000 (June 15, 2021).

¹² NERC, *Informational Filing of the North American Electric Reliability Corporation Regarding Standards Development Projects*, Docket No. RD20-2-000 (September 15, 2021) [hereinafter September 2021 Informational Filing].

¹³ NERC, *Supplemental Informational Filing of the North American Electric Reliability Corporation Regarding Standards Development Projects*, Docket No. RD20-2-000 (November 13, 2020).

011-3) on September 15, 2021,¹⁴ and the Commission approved CIP-004-7 and CIP-011-3 on December 7, 2021.¹⁵

II. PROJECT SCHEDULE

The schedule for Project 2016-02, shown below, reflects some adjustments since the September 2021 Informational Filing. As noted in the September 2021 Informational Filing, the proposed Reliability Standards revised under Project 2016-02 did not achieve enough affirmative votes during the last comment period and ballot,¹⁶ meaning the Standard Drafting Team needs to review comments, incorporate revisions, and perform outreach in order to gain the consensus needed to move forward. Moreover, further adjustments to the project schedule are necessary given Standard Drafting Team members' schedules this quarter. While the posting period has only been delayed by two months, the NERC Board of Trustees schedule is such that the final ballot would likely not be completed by the February 2022 NERC Board of Trustees meeting. As such, NERC adjusted the schedule for adoption at the May 2022 NERC Board of Trustees meeting. NERC notes that this schedule is a projection and subject to change. Any updates will be reported in the next informational filing scheduled for March 2022.

Project 2016-02 Modifications to CIP Standards

- Additional 45-day formal comment period and ballot: To be posted ~~November 2021~~ **January 2022**
- Final ballot: To be posted ~~January~~ **March 2022**
- NERC Board of Trustees Adoption: ~~February~~ **May 2022**

¹⁴ NERC, *Petition of the North American Electric Reliability Corporation for Approval of Proposed Reliability Standards CIP-004-7 and CIP-011-3 Addressing Bulk Electric System Cyber System Information Access Management*, Docket No. RD21-6-000 (September 15, 2021).

¹⁵ FERC, *Petition of the North American Electric Reliability Corporation for Approval of Reliability Standards CIP-004-7 and CIP-011-3*, Letter Order, Docket No. RD21-6-000 (December 7, 2021).

¹⁶ The ballot results are available on the project page at <https://www.nerc.com/pa/Stand/Pages/Project%202016-02%20Modifications%20to%20CIP%20Standards.aspx>.

- FERC Filing: ~~March~~ **June** 2022

III. CONCLUSION

At the time of this filing, Project 2016-02 remains on schedule as modified herein. If any changes occur to the project's status, target dates, or anticipated filing dates, NERC will provide these changes in its quarterly informational filings submitted pursuant to the directive in the February 20 Order.

Respectfully submitted,

/s/ Marisa Hecht

Lauren Perotti
Senior Counsel
Marisa Hecht
Counsel
North American Electric Reliability Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
lauren.perotti@nerc.net
marisa.hecht@nerc.net

*Counsel for the North American Electric
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December 15, 2021

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in the above-referenced proceeding.

Dated at Washington, D.C. this 15th day of December, 2021.

/s/ Marisa Hecht

Marisa Hecht
*Counsel for North American
Electric Reliability Corporation*