

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

NERC Compliance and Certification Committee 2025 Work Plan

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RELIABILITY | RESILIENCE | SECURITY



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Introduction

The purpose of this Work Plan is to identify the anticipated activities and deliverables of the NERC Compliance and Certification Committee (Committee or CCC) for 2025. The plan is based on the responsibilities assigned to the CCC by the NERC Board of Trustees (Board) for programs across the ERO Enterprise and tasks identified by the CCC that are required to fulfill these responsibilities.

The Committee, as prescribed by the January 2007 FERC Compliance Order, upheld in the June 7, 2007 FERC Order's Key Provision 8, and enumerated in the NERC Rules of Procedure (ROP), regularly assesses NERC's adherence to the ROP for several of its programs as part of the Committee's ongoing work. As an industry Committee independent of these programs, members are able to provide support and guidance relative to NERC's Compliance Monitoring and Enforcement Program (CMEP), Organization Registration and Certification Programs (ORCP), and the Reliability Standards development program. In 2025, the CCC will continue to work with policymakers and stakeholders to further refine the maturing and ongoing role for the CCC with respect to the ERO's adherence to its processes, procedures, and statutory obligations.

Many of the CCC projects and deliverables included in this Work Plan are intended to support the goals of the ERO Enterprise Compliance Monitoring and Enforcement Program (CMEP)'s Implementation Plan (IP) and the ERO Enterprise Long-term Strategy.

In addition, the CCC will support the ERO vision to address and prioritize emerging risks to reliability and security through active participation in the NERC Standing Committee Coordination Group (SCCG) and as a feedback loop in the ERO Enterprise Framework to Address Known and Emerging Reliability and Security Risks.

The CCC subcommittees and any subgroups established perform certain assigned tasks on behalf of and under the supervision of the CCC. In collaboration with ERO Enterprise Management, the CCC delegates responsibilities to the following subcommittees for projects and activities:

- Organization Registration and Certification Subcommittee (ORCS)
- ERO Monitoring Subcommittee (EROMS)
- CCC Nominating Subcommittee (NS)

The following pages represent an outline of the Work Plan deliverables and detailed project information

Vision, Mission and Guiding Principles

Vision

Effective risk-based CMEP and ORCP implemented in a consistent manner that enable the ERO Enterprise to focus resources on risks to the reliability of the Bulk Power System (BPS) and risks specific to registered entities.

Mission

The CCC is a NERC Board-appointed stakeholder Committee serving and reporting directly to the Board. In that capacity under a FERC-approved Charter, and as approved by the NERC Board, and set forth in NERC's ROP, the CCC will engage with, support, and advise the Board, the Board's Regulatory Oversight Committee (ROC) and the NERC Board of Trustees Enterprise-wide Risk Committee (EWRC) regarding all facets of the NERC CMEP and ORCP.

Guiding Principles

The CCC partners with NERC leadership on a variety of key NERC initiatives and criteria for evaluation and assessment of the effectiveness of NERC programs. To support this endeavor, the CCC develops an annual work plan to identify the activities that the CCC intends to perform each year to fulfill its responsibilities and any additional responsibilities the Board has established for the CCC.

The CCC provides for balanced discussion, commentary, and recommendations on compliance issues by bringing together a diversity of opinions and perspectives from NERC member sectors.

Committee members are expected to support the interests of the sector they represent, to the best of their ability and judgment.

Chapter 1: 2025 CCC Work Plan - Strategic Planning Efforts

The projects included in this category are intended to address succession planning within the CCC as well as clarify the CCC's role in the broader scope of the maturation of the risk-based approach to reliability. Further details on these projects are in the following table.

Project Name	Activities	Resource(s)
Industry Collaboration and Communication	<ol style="list-style-type: none">1) Maintain direct involvement in the SCCG.2) Enhance communications and participation with industry groups with a focused plan for coordination.3) Ensure that materials developed for onboarding new CCC members and for industry stakeholders looking for background information about the CCC are current<ol style="list-style-type: none">a) Including by not limited to meeting minutes, actions taken, and use of NERC Extranet site for committee collaboration4) Create feedback loops with the Member Representatives Committee (MRC) and the Standards Committee (SC) and seek opportunities to create additional feedback loops with industry organizations as it relates to CMEP, ORCP, and Standards Development activities.5) Build upon the successful deployment of the Program for Monitoring Stakeholders' Perceptions as noted under CCCPP-008.	CCC, NERC Management
Enhancing CCC Program Efficiencies	<ol style="list-style-type: none">1) Continue evaluation of various activities and functions of subcommittees/working groups to determine ways to improve the effectiveness and efficiency of the CCC.2) Periodically review EROMS, ORCS, and Nominating Subcommittee Scopes.3) Explore opportunities to "cross train" across various CCC subcommittees.4) Work with NERC to develop criteria to evaluate goals, tools, and procedures of each Regional Entity (RE)CMEP to determine the effectiveness of each RE CMEP and how they are harmonized across the ERO.5) Conduct committee self-assessment to determine effectiveness of CCC and its leadership	CCC, NERC Standing Committees, NERC Management

Chapter 2: 2025 CCC Work Plan - Ongoing Responsibilities

The table below summarizes the list of ongoing responsibilities assigned to the CCC. In general, responsibilities are divided into two primary categories: 1) activities that respond to the CCC Charter and the NERC ROP, and 2) activities that support the NERC mission. Further details on the deliverables and projects are discussed in the next chapter by project name identified below.

Project Name	Activities	Resource(s)
Review and Update of CMEP and CCC Programs and Procedures	<ol style="list-style-type: none"> 1) Review and monitor changes to the CMEP and other NERC initiatives that could require updates or changes to CCC programs and procedures. <ol style="list-style-type: none"> a) Annual evaluation and, if needed, update of criteria for assessing effectiveness of RE CMEP activities, considering ERO input, to appropriately reflect program modification, improvements, and prior years' evaluations. b) Working with IA, assess impact of risk-based CMEP implementation on: (a) monitoring practices (as embodied in CCCPP-010); (b) enforcement; and (c) Reliability Standards development. c) Review the Board Compliance Guidance Policy with the MRC, provide stakeholder feedback on the programs and take associated actions to support improvements working in collaboration with NERC Management. d) Per the terms of CCCPP-011, conduct an annual review of the criteria for approval to become an organization seeking to be pre-qualified to submit Implementation Guidance to the ERO Enterprise. 2) Evaluate and review CCC Charter, including functions and responsibilities, and any potential ROP changes impact. 3) Explore opportunities to "cross-train" among EROMS, ORCS and NS Work with NERC staff to continue to improve the CCC Webpage on the NERC website and communication with industry with additional outreach. 	CCC, NERC Management
Program Support Efforts (CMEP, Standards Development)	<ol style="list-style-type: none"> 1) Identify and participate in risk-based compliance assurance outreach, such as internal controls, and feedback discussions. 2) Support rollout of key activities and/or CMEP and ORCP revisions in accordance with ERO Enterprise goals as requested. 3) Partner with ERO Enterprise to provide feedback/comments as requested on <ol style="list-style-type: none"> a) Reliability Standards Audit Worksheet (RSAW) development, b) CMEP Practice Guides, 4) Review and respond to stakeholder requests to become a pre-qualified entity to submit compliance Implementation Guidance. 5) Evaluate results and input on stakeholder perceptions and work with NERC management on proposed resolutions. <ol style="list-style-type: none"> a) Hold "focus group" discussions that are intended to identify opportunities for the ERO Enterprise to drive specific improvements and information sharing across the ERO Enterprise. b) Provide additional guidance, as needed, to NERC Staff regarding the Align tool c) Participate on Align Users Group (CCC Chair, CCC Vice Chair, CCCEC Representative) 	CCC, NERC Management
Assistance with Review of ERO documentation for ORCP	<ol style="list-style-type: none"> 1) Support review of ERO documentation for ORCP to identify revisions and make recommendations as programs mature. <ol style="list-style-type: none"> a) Provide additional guidance, as needed, to NERC Staff regarding the entity registration tool: Centralized Organization Registration ERO 	ORCS

Project Name	Activities	Resource(s)
	<p>System (CORES).</p> <p>b) ORCS participates in the Functional Mapping Focus Group.</p> <p>c) Support new IBR registration</p>	
Monitor NERC's adherence to the ROP	<p>1) In coordination with NERC Internal Audit under Sections 405/406/506/Various NERC Appendices of the NERC ROP, participate as observers in audits of NERC in the areas of CMEP, ORCP, and the Standards development program, including reviewing the final audit reports and reporting to the EWRC on industry observations and provide written report where necessary. Work with NERC to develop criteria to evaluate the goals, tools, and procedures of each RE CMEP to determine the effectiveness of each RE CMEP.</p>	CCC, NERC Internal Audit
EWRC Collaboration	<p>1) Participate and support EWRC activities and discussions,</p> <p>a) Provide an update of CCC activities at each quarterly EWRC meeting.</p> <p>i) This may include review of results of Stakeholder Perception Report, update of CCC key quarterly activities, annual work plan, any topic requested by the ERWC.</p> <p>b) Provide summary findings related to stakeholder perceptions conducted by CCC.</p> <p>2) Participate in the annual ERO risk discussions with NERC Management and provide input into NERC's annual risk assessment, as requested.</p>	CCC Leadership, EWRC and ERO Enterprise Management, NERC Director, Internal Audit
NERC Reliability Issues Steering Committee (RISC) Collaboration	<p>1) Provide input to existing risks, mitigation strategies, and emerging risk identification.</p> <p>a) Perform outreach with stakeholders to gather input for emerging risks.</p> <p>2) Participate and support RISC activities and discussions, including Reliability Risk Leadership Summit, provide updates to CCC members.</p>	CCC Leadership, NERC Management
ERO Enterprise Program Alignment	<p>1) As noted in the 2017 ERO Alignment Effort, the CCC collaborates with the NERC and the REs, on the ERO Enterprise's Program Alignment, to address alignment in the execution of both CMEP and the ORCP. To support the success of CMEP and ORCP, the CCC will</p> <p>a) At NERC's request, assist NERC with screening of information, support further review of reported items, and provide suggested resolutions if warranted.</p> <p>i) Gather information regarding potential alignment issues.</p> <p>ii) Evaluate nature and extent of the alignment issue.</p> <p>iii) Develop suggested resolution of the issue.</p> <p>iv) Present suggested resolution to the CCC for review and endorsement.</p> <p>v) Communicate suggested resolutions of alignment issue to the CCC to communicate to NERC.</p>	CCC, NERC Management
Support of ERO Effectiveness	<p>1) Manage stakeholders' perception program</p> <p>a) Consistent with responsibilities outlined in CCCPP-008, lead efforts to solicit input from industry and the ERO Enterprise on objectives, content, and delivery of assessments of ERO effectiveness related to CMEP, ORCP, Standards Development Program and EO Enterprise Program Alignment.</p> <p>b) Evaluate results of assessments and provide recommendations for the ERO Enterprise and the Board</p> <p>c) Periodically solicit input from the industry, including the MRC</p>	EROMS, NERC Management

Project Name	Activities	Resource(s)
	<ul style="list-style-type: none"> 2) Support development efforts for assessments of ERO effectiveness <ul style="list-style-type: none"> a) Work with NERC Management and the SCCG to continue to develop the processes between the NERC standing committees to ensure that all NERC committees represent a continuous improvement loop in support of reliability and security – further supporting the Framework to Address Known and Emerging Reliability and Security Risks. 3) Act as the hearing body where NERC is the Compliance Enforcement Authority and, as directed by the Board, serve as mediator between NERC and Regional Entities on CMEP disputes. 4) Provide stakeholder expertise to support the development and maturation of Align, Secure Evidence Locker and CORES. 	
Stakeholder Collaboration	<ul style="list-style-type: none"> 1) Identify industry stakeholder groups where CCC collaboration will strengthen ERO process and approach. <ul style="list-style-type: none"> a) Lead CCC task forces, such as the Consistency Tool Task Force, that are intended to provide guidance to ensure that CMEP impacts are fully considered in technical analyses being undertaken by other technical committees and the ERO Enterprise more generally. 2) Participate in industry outreach as requested with ERO personnel on designated ERO topics. <ul style="list-style-type: none"> a) Strengthen partnerships with industry forums to work collaboratively toward consistent understanding of ERO Enterprise Programs and improvements to processes to strengthen reliability and security (NATF, NAGF, Regional Compliance Forums, Councils, Committees, etc.). 	CCC, Stakeholder Committees

Chapter 3: 2025 CCC Work Plan - Deliverables

Project Name	Activities/Deliverables	Resource	Date
CMEP and CCC Programs and Procedures	Review CCC procedures and update as needed per EROMS schedule.	EROMS	Q4
	Update Extranet site to document CCC processes, meeting minutes and actions taken.	CCC	Q4
	Provide training on Extranet use to all CCC members	NERC Staff	Q1
	CCC members (5-6) participate as observers in NERC Internal Audit's CMEP and ORCP audits.	CCC	Q4
	As part of consistency and predictability on RE audit engagements, collaborate with ERO on path forward of RSAWs & Internal controls reviews to clearly communicate to industry any shift in expectations.	CCC/NERC Staff	Q2
	Implement any enhancements or changes based on feedback from the 2024 CCC Self-Assessment Survey	CCCEC	Ongoing
Registration Input	ORCS continue to support NERC, through the ORCG with the NERC IBR Work Plans 2nd year efforts in identifying candidates for Category 2 GO and/or GOP functional registration. ORCS maybe requested to provide feedback and assistance during the identification activities.	ORCS	Q4
	Participate in CORES Functional Mapping project and provide feedback, as requested	ORCS	Ongoing
Compliance Input	Review and comment on CMEP Practice Guides, as requested, work with ERO staff on intended use across REs and understand how the CCC feedback provided has been incorporated or not.	CCCEC	Ongoing
	Provide input on the Evidence Request Tool and RSAWs and have mechanism to understand how CCC input provided has been incorporated or not	EROMS	Ongoing
Enterprise-wide Risk Collaboration	Provide updates regarding CCC activities, consistent with the EWRC mandate that calls for the EWRC to coordinate with the CCC with respect to the CCC's execution of its responsibilities under applicable FERC orders and the ROP. Share Annual Work Plan and key deliverables, provide findings of prior year Stakeholder Perceptions report (Q2)	CCC Chair	Quarterly
	Provide the RISC input on CMEP, ORCP, and ERO Alignment activities and associated risks.	CCC Chair and Vice Chair	Ongoing
	Support ERO risk assessment framework and provide input on residual risk evaluation as requested	CCC	Ongoing

Project Name	Activities/Deliverables	Resource	Date
ERO Program Alignment	As requested by NERC, analyze issues and determine the scope and material impact.	CCC, NERC Staff	Ongoing
	Review Consistency Report Tool submittals and resolutions	CCCEC, NERC Staff	Quarterly
Support of ERO Program Effectiveness	Hold “focused discussions”, as outlined in CCCPP-008 to solicit input from industry and the ERO Enterprise on objectives, content, and delivery of assessments of CMEP, ORCP and Standards Development Program effectiveness	EROMS	Quarterly
	Support ERO development of any additional metrics to measure risk mitigation (leverage CMEP biennial reports)	CCC	Ongoing
	Working with Internal Audit, use CCCPP-010 criteria to evaluate effectiveness during CMEP, ORCP and SDP audits	CCC, NERC Internal Audit	Q2
	Develop 2024 Stakeholder Perception Feedback Report, review with NERC staff their activities underway or planned to address the feedback.	EROMS	Q1
	Consistent with the SC/SCCG recommendations, support activities to implement recommendations from 2022 Standards Process Engagement Stakeholder Group (SPESG) proposal.	CCCEC	Ongoing
Stakeholder Collaboration	Participate in and provide feedback to Align Users Group (AUG)	CCC Reps	Quarterly
	Collaborate with ERO on further outreach on Align and SEL functionality, including development of communication plan and training	CCC reps	Q1
	Consistent with the SC/SCCG recommendations, collaborate with SCCG and ERO leadership to facilitate solutions, enhance program efficiency, effectiveness, and agility.	CCC	Quarterly
	Review new or upcoming SARs to help prioritize emerging issues, as needed and work with SCCG to help prioritize workload for the Standards Committee.	CCC Chair and Vice Chair	Ongoing

Chapter 4: Logistics and NERC Budget Requirements for CCC Activities

As part of the ongoing effort to improve effectiveness and efficiency, and to ensure that all CCC members can fully participate, for 2025, the CCC's first quarter meeting will be fully virtual, and the remaining meetings will have a hybrid option.

CCC Quarterly Meetings (Cost to be determined by NERC and industry, if applicable)

Assumptions: Four CCC meetings per year, via WebEx and in-person.

- NERC staff attendance
- NERC travel expenses
- Hotel (Conference rooms if applicable – normally hosted at stakeholder locations or NERC offices)
- Food

CCC Program Audits/Review

In 2025, no audits are planned and no related expenses expected.

Webex/Conference Calls (Cost to be determined by NERC)

Assumptions: Conference calls, including CCC/Subcommittees conducted via NERC Webex.

Training (Cost to be determined by NERC)

Assumptions: Half-day of hearing training appended to regular CCC meeting at least every three years.

CCC members should have the capability to assist with observation and creation of audit criteria to fulfill responsibilities under the CCC Charter to conduct audits of NERC's adherence to the ROP. Learning programs are provided, to those new member participants, ahead of the audit activities and will be conducted as needed.

Chapter 5: Revision History

Revision History

Date	Version Number	Comments
November 12, 2024	1	CCC Executive Committee Review
December 12, 2024	2	CCC Review and Approval
February 13, 2025	2	NERC Board Review and Approval