NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Agenda
Joint Reliability and Security Technical Committee and Standards Committee Informational Session

June 12, 2024 | 1:30 – 4:30 p.m. Pacific
Hybrid

WebEx Link

Amazon Headquarters
SEA51 Mayday
1220 Howell Street
Seattle, WA 98101

Call to Order

NERC Antitrust Compliance Guidelines and Public Announcement

Introductions and Chair's Remarks

Agenda

1. **Reliability and Security Technical Committee (RSTC) Governance** – RSTC Chair Rich Hydzik (20 minutes)
    a. Roles and Responsibilities
    b. Executive Committee
    c. RSTC Organization (Program Areas)
2. **Standards Committee (SC) Governance** – SC Chair Todd Bennett (20 minutes)
    a. Roles and Responsibilities
    b. Project Management Oversight Subcommittee
    c. Standards Committee Process Subcommittee
3. **RSTC and SC SAR Development Processes –** RSTC Vice Chair John Stephens and SC Vice Chair Troy Brumfield (35 minutes)
4. **Standards Project Prioritization –** Latrice Harkness, NERC Staff (30 minutes)
5. **Reliability Framework Update** – RSTC Chair Rich Hydzik (15 minutes)
6. **Cold Weather Data Collection Update –** Lauren Perotti, NERC Staff and Donna Pratt, NERC Staff (30 minutes)
7. **CIP-013 SAR Update –** RSTC Chair Rich Hydzik (5 minutes)
8. **Future Collaboration -** SC Chair Todd Bennett and RSTC Chair Rich Hydzik (5 minutes)

9. **Chair's Closing Remarks and Adjournment** – SC Chair Todd Bennett and RSTC Chair Rich Hydzik (5 minutes)

*Background materials included.

RSTC 2024 Calendar

2024 RSTC Meeting Calendar			
Meeting Dates	**Time**	**Format**	**Location**
September 11, 2024 September 12, 2024	8:30 a.m. – 4:00 p.m. 8:30 a.m. – 12:30 p.m. Eastern	Hybrid	Montreal, Canada
December 11, 2024 December 12, 2024	11:00 a.m. – 4:30 p.m. 11:00 a.m. – 4:30 p.m. Eastern	Virtual	N/A

SC 2024 Calendar

2024 SC Meeting Calendar			
Meeting Dates	**Time**	**Format**	**Location**
July 17, 2024	1:00 – 3:00 p.m. Eastern	Virtual	N/A
August 21, 2024	1:00 – 3:00 p.m. Eastern	Virtual	N/A
September 18, 2024	10:00 a.m. – 3:00 p.m. Central	Hybrid	Waukesha, WI
October 16, 2024	1:00 – 3:00 p.m. Eastern	Virtual	N/A
November 13, 2024	1:00 – 3:00 p.m. Eastern	Virtual	N/A
December 10, 2024	10:00 a.m. – 3:00 p.m. Eastern	Hybrid	Atlanta, GA

Reliability and Security Technical Committee (RSTC)

Action
Information

Summary
The Reliability and Security Technical Committee (RSTC) is a standing committee that strives to advance the reliability and security of the interconnected bulk power system of North America by:

- Creating a forum for aggregating ideas and interests, drawing from diverse industry stakeholder expertise, to support the ERO Enterprise's mission;
- Leveraging such expertise to identify solutions to study, mitigate, or eliminate emerging risks to the BPS for the benefit of industry stakeholders, the NERC Board of Trustees (Board), and ERO Enterprise staff and leadership; and
- Overseeing the implementation of subgroup work plans that drive risk-mitigating technical solutions.

The RSTC was formed in November 2019, as part of an efficiency and effectiveness initiative conducted by the Board. A chair and vice chair were appointed at the formation of the RSTC to facilitate membership nomination, and a transition plan for the initial work plan of the RSTC, and the dissolution of the Critical Infrastructure Protection Committee, Planning Committee and Operating Committee. The full membership was appointed by the Board in February 2020, and the first meeting was held March 2020. The Charter was last updated in February 2024, and governance materials for the RSTC are posted on the NERC website.

This presentation will provide an overview of the formation of the RSTC, roles and responsibilities, and governance.

Standards Committee (SC)

Action
Information

Summary
The Standards Committee (SC) is a process oversight committee that reports, and is accountable to the NERC Board of Trustees. The SC is responsible for ensuring that the Reliability Standards, definitions, Variances, and Interpretations developed by drafting teams are developed in accordance with the processes in the Standard Processes Manual, Appendix 3A of the NERC Rules of Procedure, to support NERC's benchmarks for Reliability Standards, as well as criteria for governmental approval. Additionally, SC members have the responsibility to keep the industry segments they represent informed regarding Reliability Standards matters.

The SC manages the NERC process to develop and maintain a comprehensive set of results-based Reliability Standards. Specifically, working together with NERC Standards Staff, the SC has the following duties:

- Develop a long-term (multi-year), strategic vision describing the goals and direction for Reliability Standards development consistent with NERC's strategic and business plans.
- Coordinate with the Reliability Issues Steering Committee (RISC) to develop a Reliability Standards Development Plan (RSDP) prioritizing and aggressively pursuing work related to the purpose of the Committee.
- Assist to develop the RSDP, inclusive of preparing the initial posting for stakeholder comment.
- Establish and facilitate informal and formal collaborative, consensus building processes with stakeholder groups and NERC committees.
- Establish quality assurance and quality control processes to develop or modify Reliability Standards and applicable associated documents to align with the criteria established in the Standard Processes Manual.
- Appoint, monitor, and direct teams for work related to the Standard Processes Manual (inclusive of, but not limited to, standard drafting teams), generally consisting of subject matter experts, a facilitator, a technical writer and compliance, legal and regulatory experts suitably equipped to address the desired reliability objectives.
- Receive and respond to decisions of appeals panels in accordance with the Reliability Standards process.
- Develop, maintain, and implement a Standard Processes Manual ensuring the integrity of Reliability Standards development in a fair, balanced, open, and inclusive manner.
- Facilitate communication regarding NERC Standards department and Standards Committee work, such as Reliability Standards under development and Standards Committee guiding documents.

- May consult with another NERC Committee for input to technical justification or alternate approaches to issues raised in a standard authorization request (SAR).

Reliability and Security Technical Committee (RSTC) SAR Development Process

Action
Information

Summary
As part of the Framework to Address Known and Emerging Reliability and Security Risks[1], the RSTC reviews, and provides guidance in developing deliverables[2] critical to ERO functions, such as Reliability Standards. In performing this function, the RSTC or its groups may develop Standard Authorization Request(s) (SAR)[3].

Additionally, the RSTC may endorse a SAR proposed by one of its subcommittees, work groups or task forces prior to any submission to the NERC Reliability Standards Staff or the Standards Committee. RSTC endorsement of a SAR supports initial vetting of the technical material, and the development of a sound technical justification to mitigate the identified risk.

In September 2023, the RSTC approved the RSTC SAR Development Process[4], which is posted on the RSTC page[5].

[1] See https://www.nerc.com/comm/RISC/Related%20Files%20DL/Framework-Address%20Known-Emerging%20Reliabilit-Securit%20%20Risks_ERRATTA_V1.pdf
[2] NERC provides White Papers, Technical Reference Documents, Reliability Guidance, and other resource documents that can assist registered entities with the identification and addressing of risks within their systems.
[3] See https://www.nerc.com/comm/SC/Documents/Appendix_3A_StandardsProcessesManual.pdf
[4] Reliability and Security Technical Committee SAR Process
[5] https://www.nerc.com/comm/RSTC/Pages/default.aspx

Standards Committee (SC) SAR Development Process

Action
Information

Summary
A Standard Authorization Request (SAR) is the form used to document the scope and reliability benefit of a proposed project for one or more new or modified Reliability Standards or definitions, or the benefit of retiring one or more approved Reliability Standards. Any entity or individual, including NERC committees or subgroups and NERC Staff, may propose the development of a new or modified Reliability Standard, or may propose the retirement of a Reliability Standard (in whole or in part), by submitting a completed SAR to the NERC Reliability Standards Staff. The SC has the authority to approve the posting of all SARs for projects that propose (i) developing a new or modified Reliability Standard or definition, or (ii) propose retirement of an existing Reliability Standard (or elements thereof).

The process for considering and acting on SARs is described in Sections 4.1 and 4.2 of the Standard Processes Manual, Appendix 3A to the NERC Rules of Procedure. These processes are summarized below.

When presented with a SAR, the SC shall determine if the SAR is sufficiently complete to guide Reliability Standard development and whether the SAR is consistent with this manual. The SC shall take one of the following actions:

- Accept the SAR.
- Remand the SAR back to the requestor or to NERC Reliability Standards Staff for additional work.
- Reject the SAR. The SC may reject a SAR for good cause. If the SC rejects a SAR, it shall provide a written explanation for rejection to the sponsor within ten days of the rejection decision.
- Delay action on the SAR pending one of the following: (i) development of a technical justification for the proposed project; or (ii) consultation with another NERC Committee to determine if there is another approach to addressing the issue raised in the SAR.

When the SC determines it is ready to initiate a new project, the SC shall direct NERC Staff to post the project's SAR in accordance with the following:

- For SARs that are limited to addressing regulatory or Board of Trustees directives, or revisions to Reliability Standards that have had some vetting in the industry (including vetting by a NERC technical committee), authorize posting the SAR for a 30-day informal comment period with no requirement to provide a formal response to the comments received.
- For SARs that address the development of new projects or Reliability Standards, authorize posting the SAR for a 30-day formal comment period.

The difference between a “formal” comment period and an “informal” comment period is that the drafting team is not required to respond, in writing, to comments received during an informal comment period.

If stakeholders indicate support for the project proposed with the SAR, the drafting team shall present its work to the SC with a request that the SC authorize development of the associated Reliability Standard.

The SC, once again considering the public comments received and their resolution, may then take one of the following actions:

- Authorize drafting the proposed Reliability Standard or revisions to a Reliability Standard.
- Reject the SAR with a written explanation to the sponsor, and post that explanation.

It is important to note that the purpose of the SAR phase is to establish the reliability need for, and the scope of a proposed project. In some cases, such as projects responding to a FERC directive or projects that have already been vetted in industry, the reliability need and scope for a project are already well established. In such cases, a requirement to respond in writing to each comment received is not likely to further consensus on the need for the project, or result in significant changes to the project need or scope. Therefore, the SPM has long excluded these types of projects from formal posting requirements so that the drafting teams may move more quickly toward developing consensus requirements. As a practical matter, drafting teams do review all stakeholder comments received during informal comment periods, as they can aid in identifying consensus approaches for standards development, and many teams will prepare a summary response to comments acknowledging the issues raised.

Generator Cold Weather Data Request

Action
Information

Background
Over the past twelve years, NERC and Federal Energy Regulatory Commission (FERC) staff have initiated inquiries into five events where cold weather has caused effects to the Bulk Electric System (BES) generation, with four of those events resulting in the need for firm load shed.[1] Based on the recommendations resulting from these inquiries, the ERO Enterprise and FERC have initiated several types of activities, such as Reliability Standards development, NERC Alerts issuances, a review of generator performance during cold weather in February 2024, and entity assist visits, among others, to support industry in extreme cold weather preparedness. In addition, the ERO Enterprise is preparing a broad and comprehensive strategy for coordinating its cold weather activities, including assessing the implementation of Reliability Standards addressing cold weather over the next several years as part of robust compliance monitoring.

Along those lines, FERC issued an order[2] on February 16, 2023, directing NERC to work with FERC staff to develop a plan to collect data on the winterization of generating units, and to submit an annual informational filing on the analysis of the data. Specifically, FERC directed NERC to develop a plan that included, at a minimum, data that will help FERC understand what portion of a generator's fleet is capable of performing at the Extreme Cold Weather Temperature for the location, what portion is under a corrective action plan (and until when), and what portion will not be winterized due to declared constraints. In addition, FERC directed the plan to include how NERC will assess the actual performance of freeze protection measures during future extreme cold weather events. Finally, FERC directed NERC to file an annual informational filing reporting on the data and analysis.

In response, NERC filed its work plan on February 16, 2024, detailing its data collection and analysis for cold weather data. The plan divides its data collection into the data that will be included in each annual informational filing, the first of which will be submitted on October 1, 2025. In so doing, NERC will be able to focus on analyzing data collected through a NERC Rules of Procedure Section 1600 data request, while cold weather Reliability Standards are still in implementation stage prior to their effective dates.

FERC approved the work plan on May 23, 2024.[3]

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[1] FERC, NERC, and Regional Entity Staff Report, Inquiry into Bulk-Power System Operations During December 2022 Winter Storm Elliott, FERC-NERC and Regional Entity Staff Report (Oct. 2023), at pp. 12-14, available at https://www.ferc.gov/media/winter-storm-elliott-report-inquiry-bulk-power-system-operations-duringdecember-2022

[2] *N. Am. Elec. Reliability Corp.*, 182 FERC ¶ 61,094 (2023) (Order Approving Extreme Cold Weather Reliability Standards EOP-011-3 and EOP-012-1 and Directing Modification of Reliability Standard EOP-012-1)([hereinafter February 16 Order], *reh'g. denied,* 183 FERC ¶ 62,034, *order addressing arguments raised on reh'g,* 183 FERC ¶ 61,222.

[3] *N. Am. Elec. Reliability Corp.*, 187 FERC ¶ 61,087 (2024).

Summary

NERC Staff will review the draft generator cold weather data request to be issued under Section 1600 of the NERC Rules of Procedure, and the timelines in the process including opportunities for stakeholders to provide comment:

Date	Action
February - April 2024	ERO Enterprise drafts data request
May 2024	NERC provides to FERC Office of Electric Reliability for 21 days for FERC information
June - July 2024	Post for 45-day comment period
August - September 2024	Review comments and revise as appropriate
December 2024	NERC Board authorization
January - February 2025	Issue data request
April 2025	Responses due

The data and information to be collected under this request is necessary for NERC to meet its obligations under FERC's February 2023 order, directing NERC to collect and analyze certain cold weather data and preparedness measures. This data is necessary to support NERC's and the Regional Entities' analysis on the efficacy of, and ongoing risk posed by, certain constraints provisions in EOP-012 and the performance of freeze protection measures during future extreme cold weather events.

Generator Owners will be the reporting entities, and data will be due April 15 of each year with the initial submission due April 15, 2025. All detailed data will be treated as confidential and will only be presented publicly in aggregated and summarized form.

In subsequent filings, starting with the annual informational filing submitted on October 1, 2026, NERC anticipates continuing to collect data not submitted as compliance evidence, while also considering whether to initiate any compliance monitoring data requests (such as a periodic data submittal), to supplement analysis into the efficacy of cold weather Reliability Standards. In the future, NERC will consider the use of existing processes (such as the collection of data through the Generator Availability Database System (GADS), to support the sustainability of the data collection and analysis.