

## 2024 Standards Committee Accomplishments

### Action

Endorse the following Standards Committee Executive Committee (SCEC) determination on the Standards Committee (SC) 2024 accomplishments:

#### Focus Area: Process Improvement

- Approved Standards Committee Process Subcommittee Document Review - Completed  
The Standards Committee was issued four recommendations from the Standards Process Stakeholder Engagement Group (SPSEG) Process Improvement Work Plan. These were subsequently assigned to the Standards Committee Process Subcommittee (SCPS) to review documents and streamline processes and/or clarify existing language.
- Project Management Oversight Committee Liaison Scope - Completed  
In May 2024, the Project Management and Oversight Committee (PMOS) formed a task force and charged it with reviewing and revising their scope document. The task force updated the scope document, as well as created an internal job aid to bring clarity and consistency to the PMOS liaison's duties.
- Standard Authorization Request - Ongoing  
The SC and the Reliability and Security Technical Committee (RSTC) formed a joint task force in late 2024 with the objective to enhance timely completion and approval of Standard Authorization Requests and to leverage RSTC expertise during the development process. The work of the task force is pending.
- Standards Grading - Ongoing  
The SC and the Compliance and Certification Committee joint task force work continues into 2025 to evaluate the existing Standards Grading process, identify opportunities, and provide recommendations for improvement.

#### Focus Area: Risk Mitigation

- Standards Development Prioritization - Completed  
As detailed in the 2024-2026 Reliability Standards Development Plan, a formalized and consistent approach has been developed to prioritize projects and ensure available resources are focused on the most critical issues.
- ERO Risk Framework - Completed  
Executed and built on the role of the SC in the framework, which includes active participation in the Standing Committees Coordinating Group and framework identified feedback loops. The SC provided feedback to the Risk Framework.

#### Focus Area: Standards Quality

- FERC Directives - Ongoing

As of mid-year, there were 99 outstanding FERC directives being resolved through the development process. The SC has monitored progress and is supportive of the final resolution of these directives through completion of the following projects:

FERC Order 901 - Milestone 2 (Completed and filed with FERC by the November 4, 2024, deadline)

- Project 2020-02 Modifications to PRC-024 (Generator Ride-through) (12 directives);
- Project 2021-04 Modifications to PRC-002-2 (4 directives);
- Project 2023-02 Analysis and Mitigation of BES Inverter-Based Performance Issues (1 directive);

FERC Order 901 - Milestone 3 (Anticipated completion November 2025)

- Project 2020-06 Verifications of Models and Data for Generators (14 directives);
- Project 2022-02 Uniform Modeling Framework for IBR (24 directives);
- Project 2021-01 Modifications to MOD-025 and PRC-019 (3 directives);

FERC Order 901 - Milestone 4

- Pending Operational Studies SAR (Anticipated Q1 2025) (4 directives);
- Pending Transmission Studies SAR (Anticipated Q1 2025) (7 directives);

FERC Order - Others

- Project 2024-03 Modifications to EOP-012-2, (June 27, 2024, Order, 5 directives);

- Completed Projects

- Project 2016-02 Modifications to CIP Standards

The Version 5 Transition Advisory Group (V5 TAG) transferred issues to the Version 5 DT that were identified during the industry transition to implementation of the Version 5 CIP Standards. Specifically, the issues that the DT will address are:

- Cyber Asset and BES Cyber Asset Definition
- Network and Externally Accessible Devices
- Virtualization

On January 21, 2016, FERC issued [Order No. 822](#) Revised Critical Infrastructure Protection Reliability Standards. In this order, FERC approved revisions to version 5 of the CIP standards and directed that NERC address each of the Order 822 directives by developing modifications to requirements in CIP standards and the definition of Low Impact External Routable Connectivity (LERC), or the DT shall develop an equally efficient and effective alternative. To address concerns identified in Order 822, the Commission directed the following:

- Develop modifications to the CIP Reliability Standards to provide mandatory protection for transient devices used at Low Impact BES Cyber Systems based on the risk posed to bulk electric system reliability.
- Develop modifications to the CIP Reliability Standards to require responsible entities to implement controls to protect, at a minimum, communication links and sensitive bulk electric system data communicated between bulk electric system Control Centers in a manner that is appropriately tailored to address

the risks posed to the bulk electric system by the assets being protected (i.e., high, medium, or low impact).

- Develop a modification to provide the needed clarity, within one year of the effective date of this Final Rule, to the LERC definition consistent with the commentary in the Guidelines and Technical Basis section of CIP-003-6.

- Project 2023-03 Internal Network Security Monitoring (INSM)

On January 19, 2023, the Federal Energy Regulatory Commission (FERC) issued Order No. 8871 directing NERC to develop requirements within the Critical Infrastructure Protection (CIP) Reliability Standards for internal network security monitoring (INSM) of all high impact BES Cyber Systems and medium impact BES Cyber Systems with External Routable Connectivity (ERC). INSM permits entities to monitor traffic once it is within a trusted zone, such as the Electronic Security Perimeter, to detect intrusions or malicious activity. Specifically, Order No. 887 directs NERC to develop Reliability Standards requirements that are "forward-looking, objective-based" and address three security objectives outlined in Order No. 887. FERC directed NERC to submit these revisions for approval by July 9, 2024.

- Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination - Completed

Extreme cold weather and precipitation affected the south-central United States February 8-20, 2021. Many generating units experienced outages, derates, or failures to start, resulting in energy and transmission emergencies (referred to as "the Event"). The total Event firm load shed was the largest controlled firm load shed event in U.S. history and was the third largest in quantity of outage megawatts (MW) of load after the August 2003 northeast blackout and the August 1996 west coast blackout.

- Project 2022-01 Reporting ACE Definition and Associated Terms

The SAR states that the current definition of Reporting Area Control Error (ACE) presents a conflict with the Western Interconnection's Automatic Time Error Correction (ATEC) process and does not allow other Interconnections to pursue ATEC. Additionally, there is confusion in that the terms ACE and Reporting ACE are both used throughout the standards. A revised definition should provide improved long-term average frequency performance as well as give other Interconnections the ability to pursue automatic correction approaches.

- Projects anticipated to be submitted to the December NERC Board of Trustees

- Project 2023-04 Modifications to CIP-003

The LICRT report recognized that low impact BES Cyber Systems may introduce BES reliability risks of a higher impact where distributed low impact BES Cyber Systems are used for a coordinated attack. The project recommended enhancing the existing low impact category to further mitigate the coordinated attack risk.

- Project 2021-03 CIP-002

The SC assigned a portion of the Project 2016-02 SAR that relates to TOCCs to the Project 2021-03. That SAR portion is to review CIP-002 and evaluate the categorization of TOCCs performing the functional obligations of a Transmission Operator, specifically those that meet medium impact criteria.

- Project 2022-03 Energy Assurance with Energy-Constrained Resources

This project requires entities to perform energy reliability assessments to evaluate energy assurance and when predefined criteria are not met, develop Corrective Action Plan(s), Operating Plans, or other mitigating actions to address identified risks. Energy reliability assessments evaluate energy assurance across the operations time horizons<sup>6</sup> by analyzing the expected resource mix availability (flexibility) and the expected availability of fuel during the study period.

- Project 2023-07 Transmission System Planning Performance Requirements for Extreme Weather

On June 15, 2023, FERC issued a Final Rulemaking to direct NERC to develop a new or modified Reliability Standard to address a lack of a long-term planning requirement(s) for extreme heat and cold weather events. Specifically, FERC directed NERC to develop modifications to Reliability Standard TPL-001-5.1 or a new Reliability Standard, to require the following: (1) development of benchmark planning cases based on major prior extreme heat and cold weather events and/or meteorological projections; (2) planning for extreme heat and cold weather events using steady state and transient stability analyses expanded to cover a range of extreme weather scenarios including the expected resource mix's availability during extreme heat and cold weather conditions, and including the wide-area impacts of extreme heat and cold weather; and (3) development of corrective action plans that mitigate any instances where performance requirements for extreme heat and cold weather events are not met. In addition, FERC directed "NERC to submit a new or modified Reliability Standard within 18 months of the date of publication of this final rule in the Federal Register," which equates to December 15, 2024.

- Periodic Reviews - Delayed

The Project Management and Oversight Subcommittee (PMOS) periodic review project was placed on hold to more closely align with the Standards Grading task force initiative. With 25 open standards projects, this aligns with lower project priority criteria for NERC.

- Transition of Guidelines and Technical Basis to Technical Rationale - Ongoing

The SC continued to review Guidelines and Technical Basis documents for transition to Technical Rationale documents as well as moving compliance examples contained in open Standards projects to Implementation Guidance.

## **Background**

The SCEC reviews each of the annual required tasks and provides the results of whether the SC accomplished each of the required tasks at the December meeting. Consistent with the review of the SC Strategic Work Plan at the end of 2024, the SCEC uses a binary self-evaluation process to assess the accomplishments and presents the results of each assigned task for the SC's endorsement. The SCEC agreed on the above evaluations.