



Edison Electric
INSTITUTE

Power by Association

EEI Comments

2025 NERC Business Plan Strategic Focus Areas

June 26, 2024

The Edison Electric Institute (EEI) appreciates the opportunity to provide the following input regarding NERC's draft 2025 Business Plan and Budget (BPB).

Protecting our nation's energy grid and ensuring a reliable supply of energy are top priorities for EEI, our member companies, and their customers. The risks that must be addressed with the evolving grid are broad. Stakeholder collaboration and prioritization of the most urgent threats to reliability are critical to ensure a reliable and secure grid now and in the future.

General

- EEI appreciates NERC providing three-year strategic and business planning insights and maintaining alignment with the plan.
- As the costs reflected in NERC's BPB continue to grow, these increases must be given careful review, and resources should be used as efficiently as possible to ensure such escalations are minimal. To this end, EEI recommends NERC evaluate whether it should continue, stop, or start activities and prioritize those activities to ensure it is focusing on the most significant reliability risks to the BPS.
- The 2025 BPB introduces new tools. As such, it is difficult for us to provide comments given that we are seeing some of these for the first time, which raises several questions. For example, how does the technology strategy for IBRs differ, or what synergies exist with the Entity Facility Registry? Also, is the Load Loss Data Collection new or is it an enhancement of data already collected by NERC? EEI suggests NERC provide additional clarity and details regarding the new tools. It would also be helpful to know how the new or expanded technology will improve the core processes of the ERO to be more agile and efficient for all stakeholders, including registered entities, and how the new technology will enhance reliability and security of the grid.
- EEI welcomes collaboration with NERC when developing tools that will be utilized by industry or which may include sensitive industry data.
- EEI recommends that NERC continue to collaborate with the Security Advisory Working Group and industry early in the process regarding new and enhanced

technology solutions, including the Entity Facility Registry, to ensure effective and secure solutions.

2025 Business Plan and Budget Overview

- **Page 8, 2023-2025 NERC Strategic and Business Planning:** Recommend 2023 be included in the average annual budget and assessment increase chart.

Thank you for the opportunity to provide input on NERC's 2025 BPB.