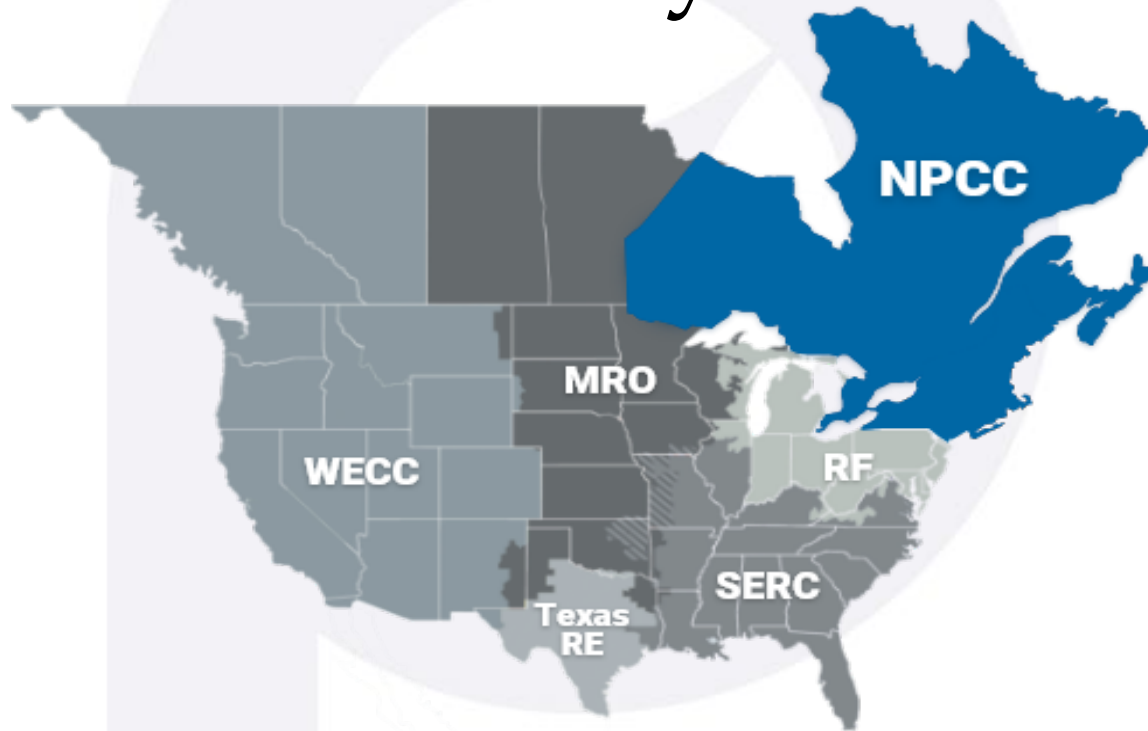


NPCC Spring 2022 Compliance and Reliability Webinar

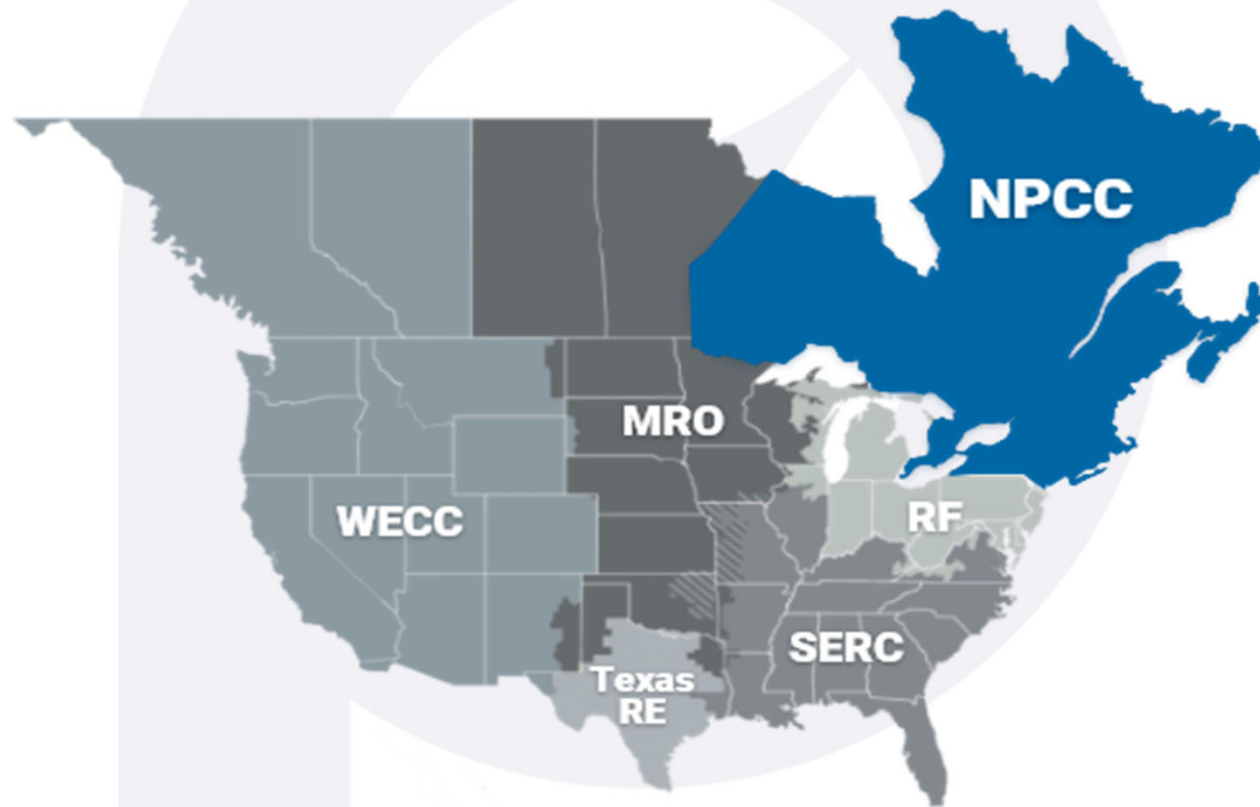


NPCC, Inc.

Disclaimer

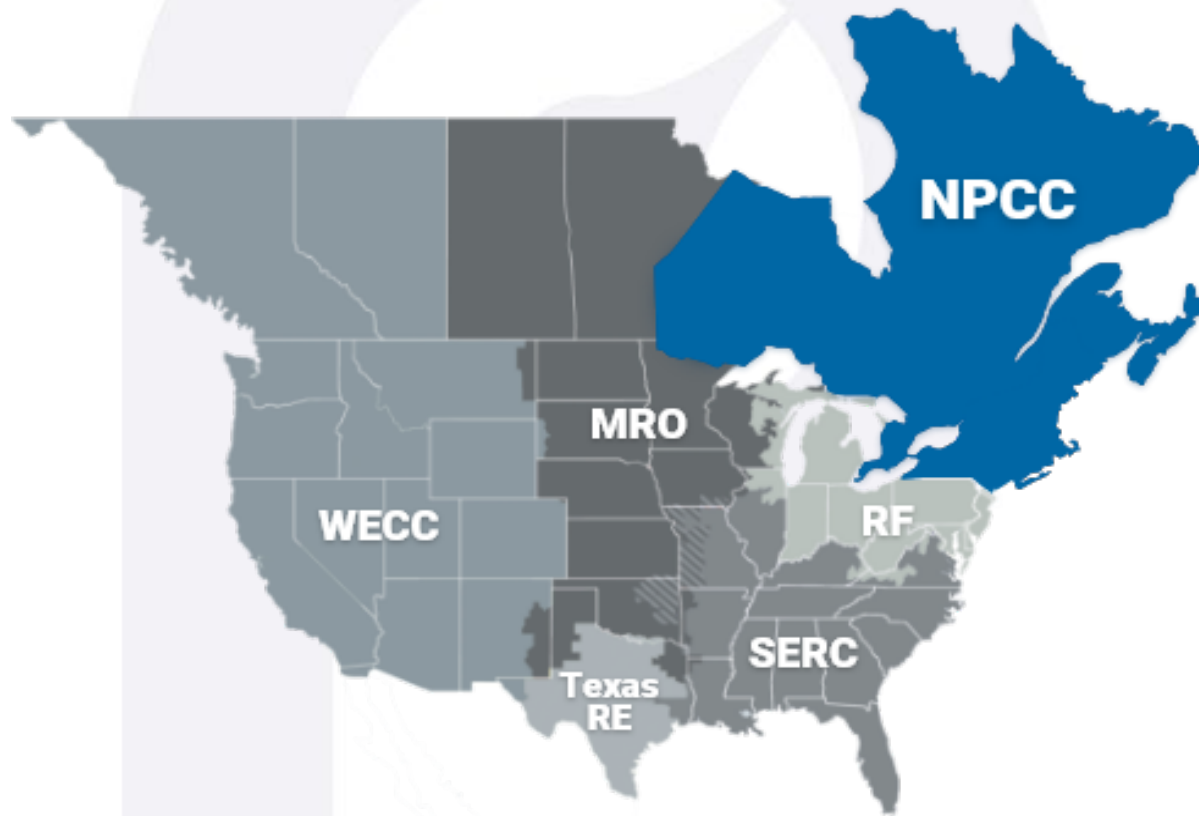
The information provided today at this workshop is intended to provide accurate and helpful guidance and education to industry and interested stakeholders. The information provided in this workshop is nonbinding and should not be relied upon for compliance or for other matters. The governing documents for compliance and other matters include the applicable NERC Reliability Standard, NERC Rules of Procedure, various regulatory agency orders, approved Implementation guidance and other laws, rules, and regulations. Compliance with Reliability Standards ultimately depends on the facts and circumstances, quality of evidence, and the language of the Reliability Standard.

Safety Message



NPCC, Inc.

Opening Remarks
Charles Dickerson
President and CEO



NPCC, Inc.

Cold Weather Preparedness Winterization Outreach

May 17, 2022

Matt Forrest





History

- Southwest Cold Weather Event, February 2011.
- Midwest and Atlantic Seaboard Polar Vortex, January 2014.
- Winter Storm Events, January 2014.
- NE/NY (Northeast Power Pool) Cold Weather event in 1989
- ISONE Cold Weather events in 2004.
- Northeast/North American Ice Storm in 1998
- Many others.



FERC and NERC Responses

- Based on the impact from these events, in 2014, FERC requested that grid operators respond to various questions around their response and follow-up to the events.
- In some areas grid operators created annual winter readiness checks from their generation and transmission entities.
- ERCOT and TRE began performing generating site visits in 2014 to gauge winter readiness and other regions followed.
- Despite the steps taken to attempt to raise awareness and readiness to cold weather events, the Texas/Southwest Cold Weather Event of February 2021 was spread out over 1045 individual BES generating units; 4,124 outages, derates and failure to start up, totaling 34,000 MW of lost generation for two consecutive days. “This is a wake-up call for all of us.” FERC Chairman Rich Glick
- In February of 2022, FERC and NERC completed a joint inquiry of the 2021 event which resulted in 29 recommendations and Standards changes to three standards



GO/GOP Standards and Focus Areas

- Cold Weather Standards Enforceable on APRIL 1ST, 2023
 - *EOP-011-2 Emergency Preparedness and Operations*
 - *Cold Weather preparedness*
 - *Freeze protection measures, annual inspections and maintenance.*
 - *Limiting conditions – fuel, capacity and availability, fuel switching, environmental constraints, minimum design temperature (operating and shut down), engineering analysis for cold weather performance*
 - *Training*
 - *Documented training for operations and maintenance personnel that is generator specific.*
 - *IRO-010-4 Reliability Coordinator Data Specification and Collection*
 - *Provide generating unit minimum design temperatures, historical operating temperatures and current cold weather performance analysis to their RC.*
 - *TOP-003-5 Operational Reliability Data*
 - *Satisfy the obligations of the documented specifications required for it's balancing authority to perform analysis functions. (Effectively the limiting conditions list from EOP-011-2.*



NPCC OUTREACH

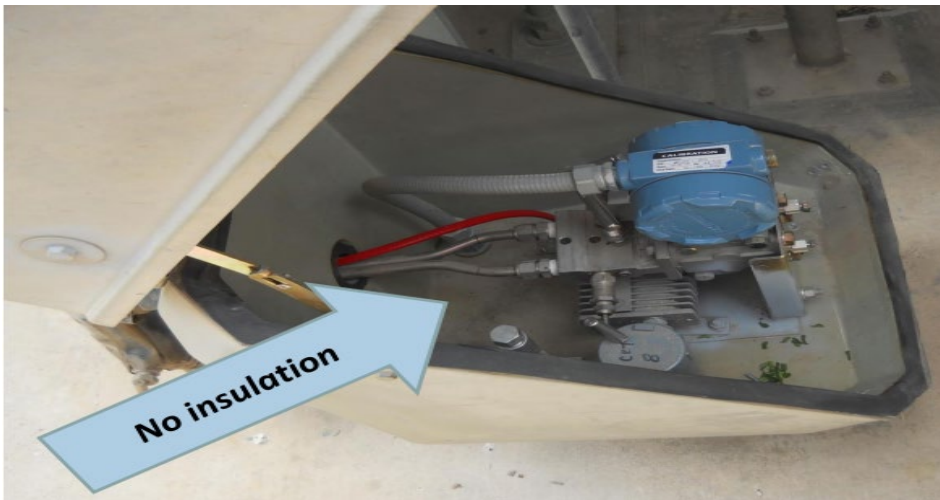
Astoria Energy, LLC
Brookfield White Pine Hydro, LLC
ReEnergy Black River
Cricket Valley Energy Center, LLC
GenOn Bowline
Lockport Energy Associates
Marco DM Holdings, LLC
Mass. Municipal Wholesale Electric Company
Fortistar North Tonawanda
New Athens Generating Company, LLC
Tanner Street Generation, LLC
Canal Generating LLC

- NPCC has invited 12 GO/GOP entities that are on the 2022 audit list to participate in our winter preparedness outreach.
- We have provided each with the GO/GOP self assessment questions from the NERC Cold Weather Practice Guide from October of 2021.
- Reviews of the responses are in progress.
- NPCC will consider up to 3 sites to participate in on-site assessments.
- This is not part of any compliance monitoring process or formal certification



NPCC OUTREACH

- Prior reviews of cold weather events along with site visits have provided several items that should be considered when each entity evaluates their approach to standards compliance.
 - Failed Heat Trace
 - Inoperable steam traps
 - Instrument failures
 - Damaged or missing insulation
 - Damaged doors or other inadequate wind breaks



Streamlining Non-Compliance

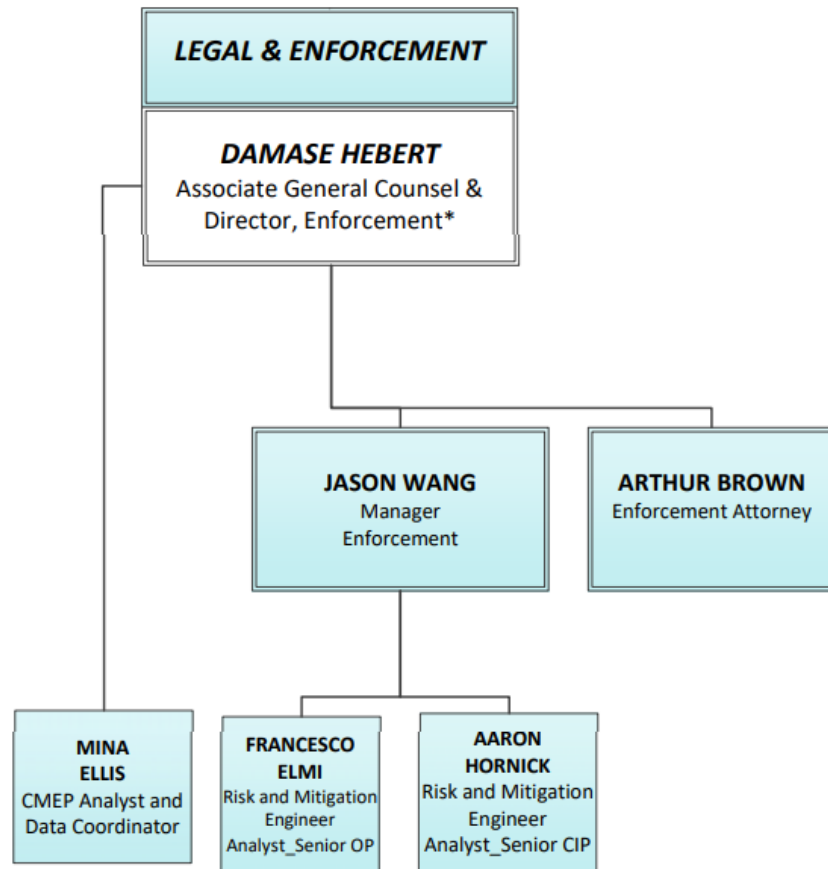
Jason Wang

Manager of Enforcement and Mitigation





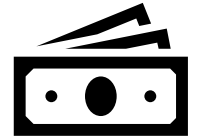
Who is the Enforcement Team and What does Enforcement Do?



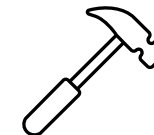
- Compliance Exceptions
- Find, Fix, Track



- Spreadsheet Notice of Penalty
- Full Notice of Penalty



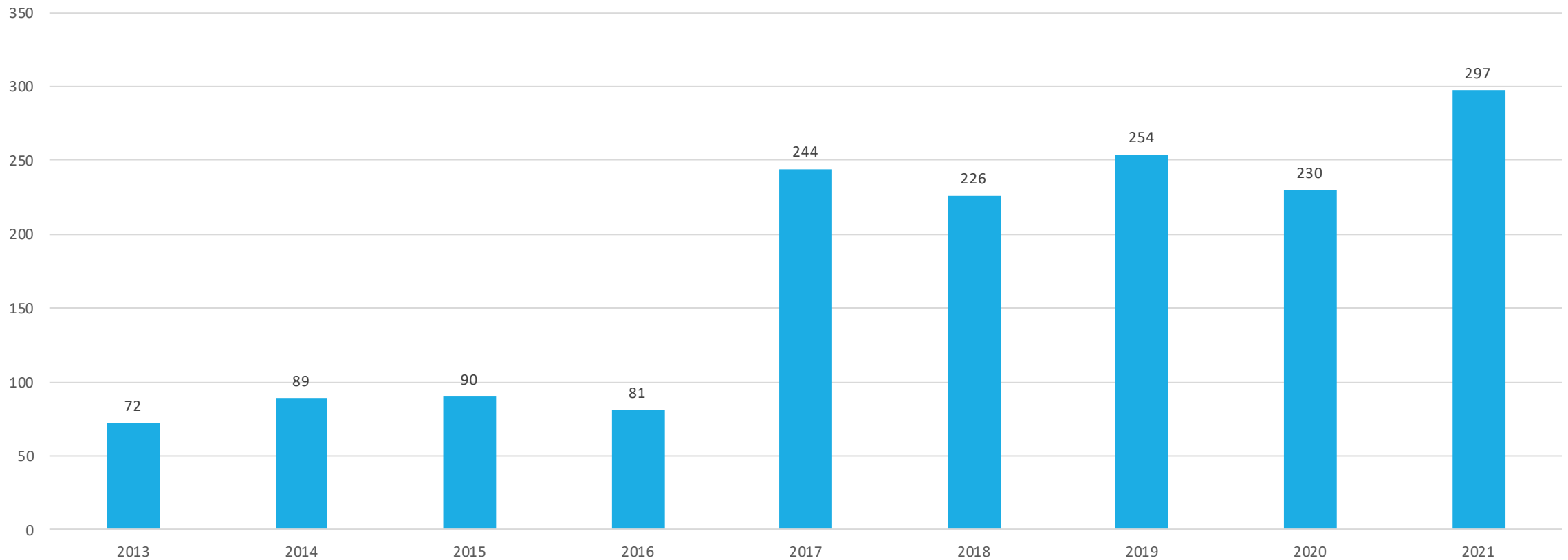
- Mitigation





NPCC Enforcement Trends

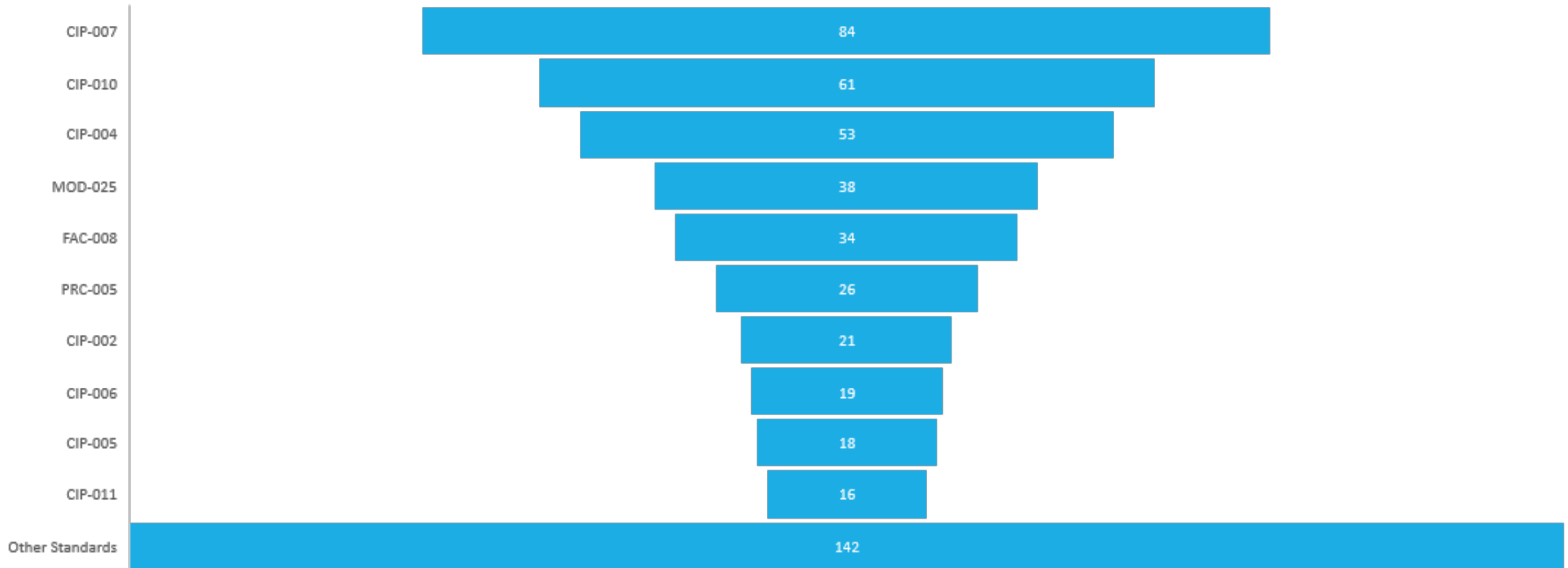
Submitted Noncompliance





What Are We Doing About It?

Top 10 Standards Populating Open Caseload (End of 2021)





How Are We Going To Do It?

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Home > Program Areas & Departments > Compliance & Enforcement > > Enforcement and Mitigation

Enforcement and Mitigation page provides a consolidated and sortable listing of monthly filings to the NERC. This information is provided for informational purposes only. In the future, this information may be used for enforcement purposes.

Sample Table A

Population Description

Statistical Sampling

Primary Population
(Examples: Substations, Generators, etc.)

Dependent Population
(Examples: etc.)

Example: MOD-025-2 R1 – Identifying Criteria from the Sample

The entity synchronized the Facility on March 29, 2017 and the net active power output identified during commissioning testing was approximately 106 MWs, which is the same value provided by the June 6, 2018 power test.

The Entity owns and operates a single steam turbine generator with nameplate capabilities of 112.5 MW and 132.4 MVA, which interconnect with the host Transmission Owner's BES substation via two 65 MVA generator step-up transformers. In addition, the generator operated at capacity factors of 23.23% in 2017 and 20.82% in 2018.

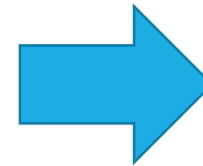
The rated capability of the generator is 5.7% of the Entity's Balancing Authority (NYISO) required Operating Reserve (1965 MW). Therefore, the capacity of this unit can be replaced by the NYISO in the event of an unnecessary trip or loss of generating capability due to inaccurate information.

Previous submittal still reliable

Inherent Properties

Balancing Authority Operating Reserve

General Factors #4...5...6...Etc...



NORTHEAST POWER COORDINATING COUNCIL, INC.
1040 AVE. OF THE AMERICAS, NEW YORK, NY 10018 (212) 840-1070 FAX (212) 302-2782

MOD-025-2 Enforcement Approach

Background Information

- [MOD-025-2 Standard Language](#)
- [MOD-025-2 Implementation Plan](#)

Standard/Implementation Plan Effective Dates

- United States

Standard	Requirement	Effective Date	% of Applicable Facilities
MOD-025-2	R1., R2., R3.	07/01/2016	40%
MOD-025-2	R1., R2., R3.	07/01/2017	60%
MOD-025-2	R1., R2., R3.	07/01/2018	80%
MOD-025-2	R1., R2., R3.	07/01/2019	100%

Key Terminology

Applicable Facilities:

- Individual generating unit greater than 20 MVA (gross nameplate rating) directly connected to the Bulk Electric System.
- Synchronous condenser greater than 20 MVA (gross nameplate rating) directly connected to the Bulk Electric System.
- Generating plant/Facility greater than 75 MVA (gross aggregate nameplate rating) directly connected to the Bulk Electric System.

Real Power

The portion of electricity that supplies energy to the load

Reactive Power

The portion of electricity that establishes and sustains the electric and magnetic fields of alternating-current equipment. Reactive Power must be supplied to most types of magnetic equipment, such as motors and transformers. It also must supply the reactive losses on transmission facilities. Reactive Power is provided by generators, synchronous condensers, or electrostatic equipment such as capacitors and directly influences electric system voltage. It is usually expressed in kilovars (kvar) or megavars (Mvar).



Benefits, Current Status and Future Goals

Standard	Enforcement Approach	Applied PNC
MOD-025	Completed	10
CIP-004	Completed	2
PRC-005	Completed	6
CIP-006	Completed	5
FAC-008	In Peer Review (Q2 2022)	N/A
CIP-007	In Progress (Q2 2022)	N/A
CIP-002	Not Started (Q3 2022)	N/A
CIP-010	Not Started (Q3 2022)	N/A
CIP-005	2023	N/A
CIP-011	2023	N/A



2022 Continued Focus FAC-008 Facility Ratings

Scott Nied
Vice President Compliance
May 17, 2022



Importance of Facility Ratings

The crux of developing accurate System Operating Limits
Without accurate ratings...

- Real-time situational awareness is impacted
 - Interface MW Flow
 - Transient Stability
 - Voltage Stability
 - System Voltage Limits
 - Interconnection Reliability Operating Limits
- System Operator response during contingencies could make things worse
- Planning studies are inaccurate
- Protection system and relay loadability settings are impacted
- Equipment is damaged





Have been a focus for several years

- April 2021: Recent civil penalty in USA of \$42 million
- Issues do not appear to be declining
- What are we seeing in the field?



What have we seen? Rubber on the road examples

Missing components

- Part and pieces and parts that make up the Facility
 - Jumpers and risers inside substations, or possibly a wavetrapp
- Missing the identification of Most Limiting Series component

Incorrect ratings on components

- Current Transformers Thermal
- Jumpers/Risers Inside Substations
- Relay Thermal
- Transmission Line Conductor
- Incorrect Aluminum Conductor Stranding
- Disconnect switches

Nuances between Normal, LTE, and STE



Actions by NPCC and NERC

- Discussions at NERC Board of Trustees (BOT)
- FAC-008 is part of 2021/22 Risk Element in NERC Compliance Implementation Plan Training and discussions with NPCC Staff and Regional Staff
- NERC Practice Guide (published 2nd Quarter 2020)
- NERC outreach (workshops, newsletters)
- NERC External Coordination
 - NATF Facilities Ratings Practices Document (for Members)
 - FERC Focus Area during FERC observed audits
 - Facility Ratings Task Force (FRTF) under the NERC BOT



What is the plan?

- ERO Enterprise Facility Ratings Strategy Team
 - ERO internal extent of condition
- Recovery Stage for 2022/23 – Call to Action
 - Continued Communication
 - FAC-008 Monitoring based on impact
 - Examine the current standard



Themes of Root Causes

Lack of Commitment

- Senior Management Engagement and Oversight
- An accurate baseline was never established
- Formalize training and refresh expectations
- Follow an official Corrective Action Program when issues are found

Inadequate Asset and Data Management

- Managing a large amount of components/Facilities
- Lack of facility ratings database with effective data capture and verification and access controls
- Reliance on contractors – oversight and commissioning

Inadequate Change Management Practices

- Establishing and maintaining strong process for communicating change amongst departments
- As-built matches design which matches EMS
- Weak data entry protocols



Best Practices – Robust Programs Include

- A methodology that is annually reviewed with clear instructions and defined roles and responsibilities and obligations by department
- Establishment of an accurate baseline of ratings and equipment
- A mature data management process to ensure continued accuracy
- Annual training for Staff of all involved departments
- Proposed and actual changes are reviewed by Subject Matter Experts
- Required pre-change approvals and notifications
- Periodic reviews/comparisons with internal and external models
- Periodic reviews with others (e.g., construction/maintenance crews, protection and control, Control Center Energy Management System support, coordination with Reliability Coordinator and Transmission Operator, coordination of rating with the neighboring system)
- Process for ad-hoc review for unplanned or if a major event has occurred



Best Practices – Tool and Actions

- Ensure that inventory tools allow write access that is dictated by defined roles in the facility ratings methodology
- Establish automated notifications to affected groups of Facility Ratings changes
 - Protection Engineering
 - Transmission Planning
 - System Operations
 - EMS Support Team
- Validate through periodic field verification of ratings or annually – percentage/quantity determination can be based on legacy, post-event review, and new installations
- Develop a checklist for equipment changes that include:
 - Data provision obligations (internally and externally)
 - Require the need to review impacts to SOLs, protection system settings, EMS/GMS alarming impacts
- Develop a complete Facility Rating database that include all series elements and identifies the most-limiting series element(s) and includes jointly owned Facilities



Aim of NPCC

- Increased entity awareness of this ERO-wide issue
- Reduce risk to the BES
 - Earlier discovery by the entity
 - Corrective and preventative mitigation starts earlier
- Adjustments to entity processes and controls result
- Entity resultant actions lend themselves to being sustainable

If you don't know where you stand, NPCC recommends:

Perform a Self-Assessment

- Full vs. Partial extent of condition





Resources

- Help is available!
 - SERC E-Learning module
 - ERO CMEP Practice Guide Facility Ratings
 - ERO CMEP Implementation Guidance FAC-008
 - RF Webinar April 4_2022 FAC_008
 - Talk With Texas May 5_2022 FAC-008
- Reach out to NPCC
- Your peers can help too
 - Find like-sized entities with similar challenges
 - What controls do they have?



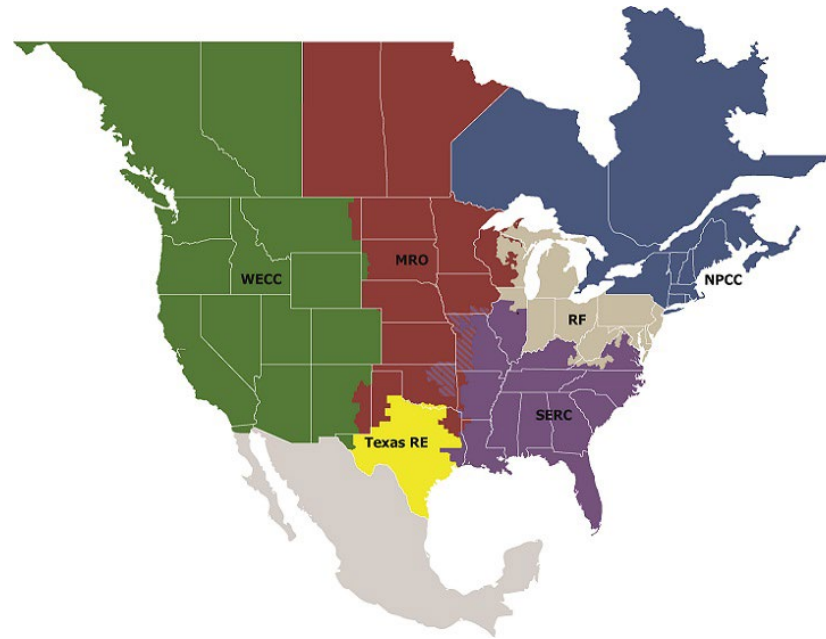
Thank you for the opportunity and your time!

Scott Nied

snied@npcc.org



Aim of NPCC





Align Update May 17, 2022

Kimberly Griffith

Senior Compliance Engineer

Dan Kidney

Senior Compliance Engineer

Emily Stuetzle

Senior CIP Analyst





Align Update

Where We Are

Where We're Going

Training

NPCC Pilot

PDS

Self-Certifications

Wrap-Up

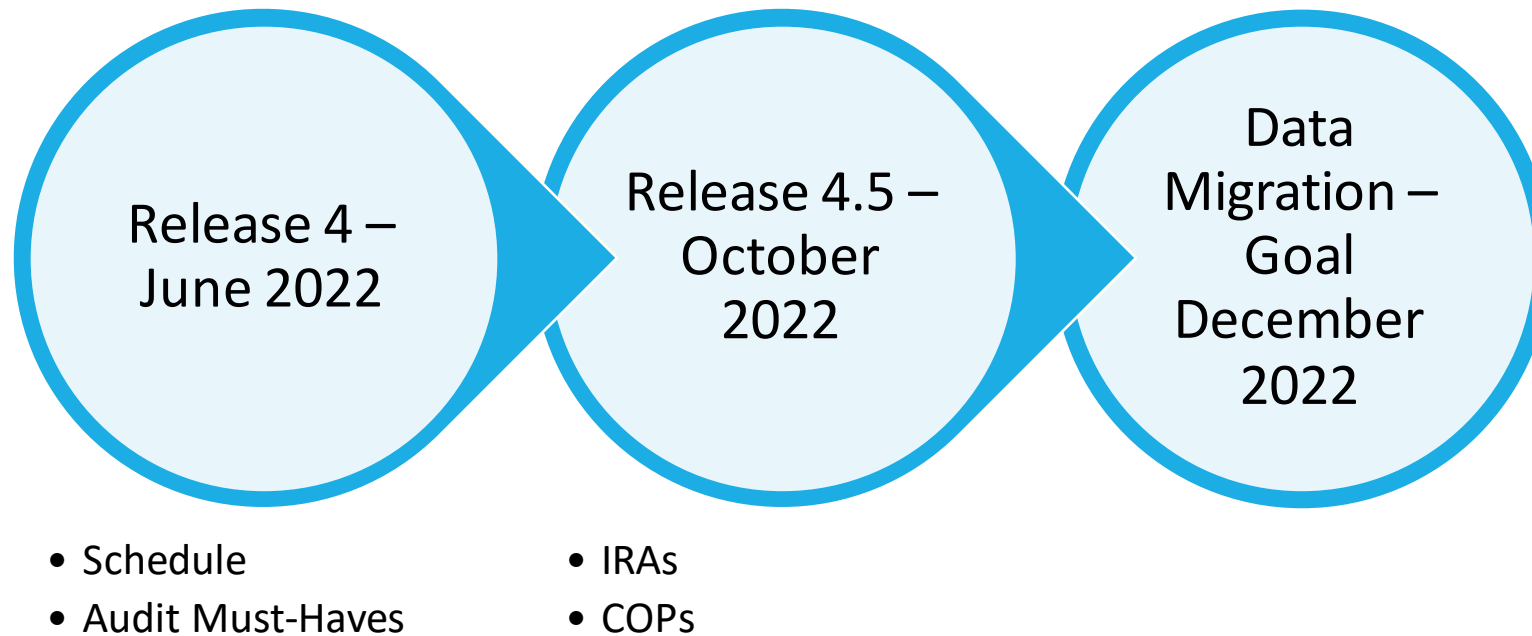


Where We Are





Where We're Going





Training

Release 3

- Initial training sent to PCCs and ACCs via email
- CC Members – Week of May 30
- All Regional Entities – Week of June 6

Release 4/4.5

- CC Members – Week of September 26
- All Regional Entities – Week of October 4

Recordings

Continued Small Group Trainings





Align Audit Pilot

ANL for Off-Site Audit went out April 26

Offering entity targeted training, prior to training in Q2

Feedback

Lessons Learned



Periodic Data Submittals

FAC-003 PDS Requests for Q4 2021 and Q1 2022 completed within Align.

New assignment process for Q1 2022 Request

- Entities required to assign PDS to user for response
- Some minor issues with assigning and viewing questions

99% response rate from NPCC Entities for PDS Requests

Attestations

- Reminder – Simply responding to question that FAC-003 is N/A to your entity will not exclude you from FAC-003 reporting.
- Attestation must be completed and submitted to remove entity from PDS request list
- Attestation require reaffirmation one year after original submittal

Q2 2022 PDS Request will be sent to entities in July.



Self-Certifications

Began using Align for Self-Certifications in Q3 2021

- Evidence submittals in the SEL
- RFIs entered into Align
 - 1 RFI entered for each data request
- Summary Letter and Self-Certification findings entered into Align
 - Areas of Concern
 - Recommendations
 - Positive Observations

Continuing to use Align for 2022 Self-Certifications



Self-Certifications

Lessons Learned - Locker Reference IDs

Evidence

Secure Evidence Locker Reference

For evidence related to CIP-003-8 R1. use: NPCC|NCR00130|SC2021-000628|SC2021-000628|CIP-003-8 R1.|R1.|
For evidence related to CIP-003-8 R2. use: NPCC|NCR00130|SC2021-000628|SC2021-000628|CIP-003-8 R2.|R2.|

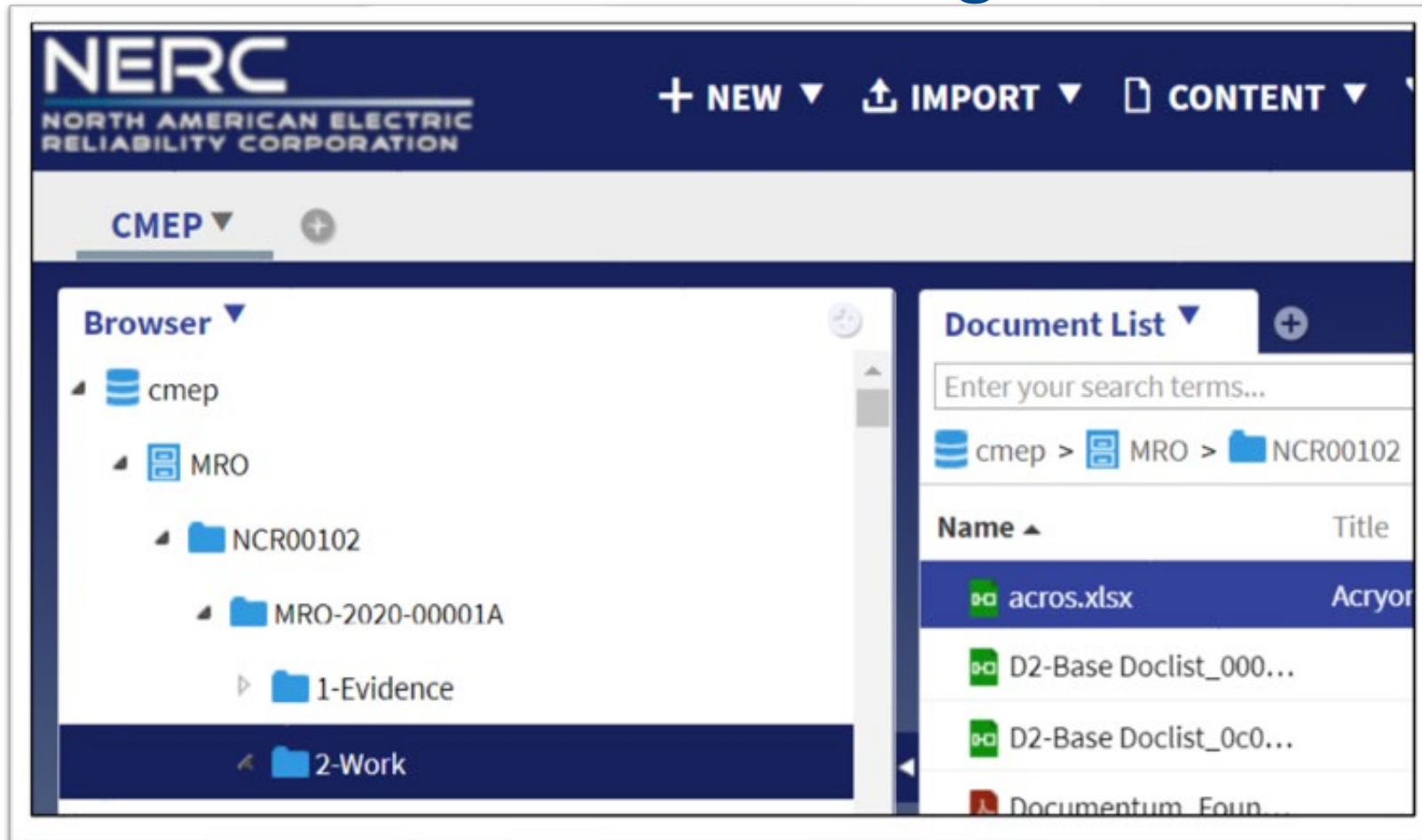
Evidence and Attachments

Locker Reference NPCC|NCR00130|SC2021-000628|SC2021-000628,RF21-000408|||



Self-Certifications

Lessons Learned - Filtering in the SEL





Self-Certifications

Lessons Learned - RFI Standard and Requirement

Request for Information

Requestor Comments

Paragraph

A

Helvetica ...

CIP-007, R1: Please provide further detail

Requestor Attachments

Attach file

Response Due By

06/11/2022

Action

Action

Send

Update will send this RFI to the Registered Entity.



Self-Certifications

Lessons Learned - RFI Close Out

Action

Review Results

Instructions	Mark this RFI as Complete or Incomplete. List. Save will store any of the review resu
--------------	---

SRM.CEA-RFI2-Review

Save and Action

Save

Close



Self-Certifications

Lessons Learned - RFI Tracking

Requests for Inf

☐ RFI ID

☐ RF21-000408

☐

	A	B	C	D	E
	Round #	Align DR #	Standard	Req.	Internal Control Questi
1					
2		RF21-000408	CIP-008-6	R1.1	X
3	1	RF22-000844	CIP-008-6	R1.1	
	1	RF22-000845	CIP-008-6	R1.1	



Wrap-Up



**Huge and
Continuing Effort**



[Training Materials](#)



NPCCAlignTeam@npcc.org



[NERC Align Project Website](#)



Questions?

PRC Compliance Best Practices and Lessons Learned

Patrick Palompo, PE
Senior Compliance Engineer





PRC Compliance Best Practices and Lessons Learned

- PRC-005-6
- PRC-006-NPCC-2



PRC-005-6

Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

Protective Relays (Table 1-1)

- **Verify that settings are as specified**
 - Required for microprocessor-based relays (unmonitored/monitored)
 - During testing it is common for some functions of multifunction relays to be enabled/disabled or spare outputs of the relay be temporarily programmed to be used for testing purposes
 - A verification that settings in the relay are as specified should be completed **before the relay is placed back into service**
- **How to show compliance**
 - Dated documentation **at the time of testing** stating that settings were verified to be as specified
 - Examples: Checklists, work orders, maintenance summaries

Table 1-1 Component Type - Protective Relay Excluding distributed UFLS and distributed UVLS (see Table 3)		
Component Attributes	Maximum Maintenance Interval ³	Maintenance Activities
Any unmonitored protective relay not having all the monitoring attributes of a category below.	6 Calendar Years	For all unmonitored relays: • Verify that settings are as specified For non-microprocessor relays: • Test and, if necessary calibrate For microprocessor relays: • Verify operation of the relay inputs and outputs that are essential to proper functioning of the Protection System. • Verify acceptable measurement of power system input values.
Monitored microprocessor protective relay with the following: • Internal self-diagnosis and alarming (see Table 2). • Voltage and/or current waveform sampling three or more times per power cycle, and conversion of samples to numeric values for measurement calculations by microprocessor electronics. • Alarming for power supply failure (see Table 2).	12 Calendar Years	Verify: • Settings are as specified. • Operation of the relay inputs and outputs that are essential to proper functioning of the Protection System. • Acceptable measurement of power system input values.



PRC-005-6

Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

Protective Relays (Table 1-1)

- **Verify operation of the relay inputs and outputs essential to proper functioning of the Protection System**
 - Required for microprocessor-based relays (unmonitored/monitored)
 - All inputs required by the relay for protective functions must be tested (e.g. applying wetting voltage)
 - All outputs utilized by the relay for protective functions must be physically operated (e.g. operate outputs during a test, manually pulse/latch)
 - It is common during relay testing that a spare output of a relay is used for operating feedback to a test set. This method of testing does not verify operation of the designed output contacts of the protection system circuitry.
- **How to show compliance:**
 - Dated documentation **at the time of testing** stating that the operation of the relay inputs and outputs essential to proper functioning of the Protection System have been verified
 - Examples: Checklists, work orders, maintenance summaries

Table 1-1 Component Type - Protective Relay Excluding distributed UFLS and distributed UVLS (see Table 3)		
Component Attributes	Maximum Maintenance Interval ³	Maintenance Activities
Any unmonitored protective relay not having all the monitoring attributes of a category below.	6 Calendar Years	For all unmonitored relays: • Verify that settings are as specified For non-microprocessor relays: • Test and, if necessary calibrate For microprocessor relays: • Verify operation of the relay inputs and outputs that are essential to proper functioning of the Protection System. • Verify acceptable measurement of power system input values.
Monitored microprocessor protective relay with the following: • Internal self-diagnosis and alarming (see Table 2). • Voltage and/or current waveform sampling three or more times per power cycle, and conversion of samples to numeric values for measurement calculations by microprocessor electronics. • Alarming for power supply failure (see Table 2).	12 Calendar Years	Verify: • Settings are as specified. • Operation of the relay inputs and outputs that are essential to proper functioning of the Protection System. • Acceptable measurement of power system input values.



PRC-005-6

Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

Using the work of others:

- Many companies utilize third-party contractors to perform PRC-005-6 maintenance work
- The compliance burden will be on the entity
- In your contract, specifically state that you require all PRC-005-6 maintenance activities be properly documented
 - Do not just state “perform PRC-005-6 maintenance”
 - Provide specific checklists to be completed by third-party contractors
- Review and confirm that all required maintenance activities were performed and properly documented



PRC-005-6

Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

Best Practices

- Utilize checklists during PRC-005-6 maintenance work
- Must have dated documentation at the time of testing to show all required maintenance activities were completed

Additional Material

- Supplemental Reference and FAQ documents for clarification of individual maintenance activities listed in the tables
 - [PRC-005-6 Supplementary Reference and FAQ](#)
 - https://www.nerc.com/pa/Stand/PRC0056RD/Supplementary_Reference_Rev_2015Oct09_clean.pdf
- ERO Enterprise-Endorsed Implementation Guidance
 - [MRO Standards Committee - PRC-005-6 Application Guide](#)
 - <https://www.nerc.com/pa/comp/guidance>



PRC-006-NPCC-2

Automatic Underfrequency Load Shedding

Requirement 3

Distribution Providers and Transmission Owners

Implement an automatic UFLS program on an island basis specified by Attachment C Table 1 – Table 3

UFLS Table 1: Eastern Interconnection

Distribution Providers and Transmission Owners with 100 MW² or more of peak net Load shall implement a UFLS program with the following attributes:

UFLS Stage	Frequency Threshold (Hz)	Minimum Relay Time Delay (s)	Total Nominal Operating Time (s) ¹	Load Shed at Stage as % of TO or DP Load	Cumulative Load Shed as % of TO or DP Load
1	59.5	0.10	0.30	6.5 – 7.5	6.5 – 7.5
2	59.3	0.10	0.30	6.5 – 7.5	13.5 – 14.5
3	59.1	0.10	0.30	6.5 – 7.5	20.5 – 21.5
4	58.9	0.10	0.30	6.5 – 7.5	27.5 – 28.5
5	59.5	0.10	10.0	2 - 3	29.5 – 31.5

1. The total nominal operating time includes the underfrequency relay operating time plus any interposing auxiliary relay operating times, communication times, and the rated breaker interrupting time. The underfrequency relay operating time is measured from the time when frequency passes through the frequency threshold setpoint, using a test rate of frequency decay of 0.2 Hz per second. If the relay operating time is dependent on the rate of frequency decay, the underfrequency relay operating time and any subsequent testing of the UFLS relays shall utilize a test rate of linear frequency decay of 0.2 Hz per second.
2. Peak net load shall be calculated as an average of the peak net load from the previous 3 years, excluding the current year.



PRC-006-NPCC-2

Automatic Underfrequency Load Shedding

Total Nominal Operating Time

- The time listed should be used as “design criteria”
- No tolerance of +/- 50 milliseconds is specified (Retired NPCC Directory 12 Criteria)

UFLS Table 1: Eastern Interconnection					
Distribution Providers and Transmission Owners with 100 MW ² or more of peak net Load shall implement a UFLS program with the following attributes:					
UFLS Stage	Frequency Threshold (Hz)	Minimum Relay Time Delay (s)	Total Nominal Operating Time (s) ¹	Load Shed at Stage as % of TO or DP Load	Cumulative Load Shed as % of TO or DP Load
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2	59.3	0.10	0.30	6.5 – 7.5	13.5 – 14.5
3	59.1	0.10	0.30	6.5 – 7.5	20.5 – 21.5
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1. The total nominal operating time includes the underfrequency relay operating time plus any interposing auxiliary relay operating times, communication times, and the rated breaker interrupting time. The underfrequency relay operating time is measured from the time when frequency passes through the frequency threshold setpoint, using a test rate of frequency decay of 0.2 Hz per second. If the relay operating time is dependent on the rate of frequency decay, the underfrequency relay operating time and any subsequent testing of the UFLS relays shall utilize a test rate of linear frequency decay of 0.2 Hz per second.
2. Peak net load shall be calculated as an average of the peak net load from the previous 3 years, excluding the current year.



PRC-006-NPCC-2

Automatic Underfrequency Load Shedding

Total Nominal Operating Time

- Relay time delays should be set low enough to account for the relay operating time, any interposing auxiliary relay operating times, any communication times, and the rated breaker interrupting time
- All factors combined should equal to 0.30 or 10.0 seconds according to the UFLS Tables

UFLS Table 1: Eastern Interconnection					
Distribution Providers and Transmission Owners with 100 MW ² or more of peak net Load shall implement a UFLS program with the following attributes:					
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3	59.1	0.10	0.30	6.5 – 7.5	20.5 – 21.5
4	58.9	0.10	0.30	6.5 – 7.5	27.5 – 28.5
5	59.5	0.10	10.0	2 - 3	29.5 – 31.5

- The total nominal operating time includes the underfrequency relay operating time plus any interposing auxiliary relay operating times, communication times, and the rated breaker interrupting time. The underfrequency relay operating time is measured from the time when frequency passes through the frequency threshold setpoint, using a test rate of frequency decay of 0.2 Hz per second. If the relay operating time is dependent on the rate of frequency decay, the underfrequency relay operating time and any subsequent testing of the UFLS relays shall utilize a test rate of linear frequency decay of 0.2 Hz per second.
- Peak net load shall be calculated as an average of the peak net load from the previous 3 years, excluding the current year.



PRC-006-NPCC-2

Automatic Underfrequency Load Shedding

Total Nominal Operating Time

Best Practices

- Step 1 - Work backwards to determine what your relay operating time should be
 - Start with your UFLS Stage Total Nominal Operating Time
 - Subtract the rated breaker interrupting time
 - Subtract any communication system times
 - Subtract any interposing auxiliary relay times
 - You'll be left with your relay operating time
- Step 2 – To determine relay time delay settings
 - Start with your relay operating time calculated in Step 1
 - Subtract a known relay processing time and relay output contact closure time as determined from relay testing for your relay model type
 - If the relay underfrequency time delay is programmed in seconds, you'll already be left with your time delay setting
 - If the relay underfrequency time delay is programmed in cycles, you must convert from seconds to cycles based on the frequency of the UFLS Stage you are calculating

UFLS Table 1: Eastern Interconnection

Distribution Providers and Transmission Owners with 100 MW² or more of peak net Load shall implement a UFLS program with the following attributes:

UFLS Stage	Frequency Threshold (Hz)	Minimum Relay Time Delay (s)	Total Nominal Operating Time (s) ¹	Load Shed at Stage as % of TO or DP Load	Cumulative Load Shed as % of TO or DP Load
1	59.5	0.10	0.30	6.5 – 7.5	6.5 – 7.5
2	59.3	0.10	0.30	6.5 – 7.5	13.5 – 14.5
3	59.1	0.10	0.30	6.5 – 7.5	20.5 – 21.5
4	58.9	0.10	0.30	6.5 – 7.5	27.5 – 28.5
5	59.5	0.10	10.0	2 - 3	29.5 – 31.5

1. The total nominal operating time includes the underfrequency relay operating time plus any interposing auxiliary relay operating times, communication times, and the rated breaker interrupting time. The underfrequency relay operating time is measured from the time when frequency passes through the frequency threshold setpoint, using a test rate of frequency decay of 0.2 Hz per second. If the relay operating time is dependent on the rate of frequency decay, the underfrequency relay operating time and any subsequent testing of the UFLS relays shall utilize a test rate of linear frequency decay of 0.2 Hz per second.
2. Peak net load shall be calculated as an average of the peak net load from the previous 3 years, excluding the current year.



PRC-006-NPCC-2

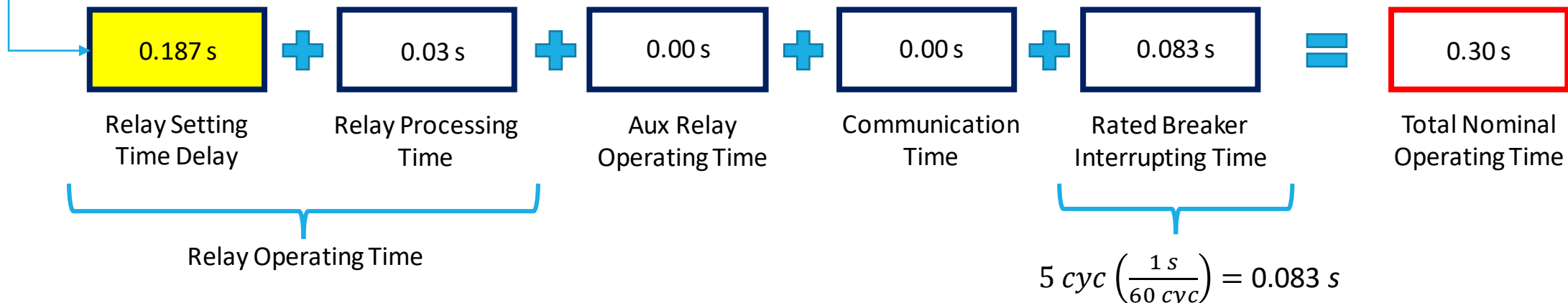
Automatic Underfrequency Load Shedding

Total Nominal Operating Time

- Example 1
 - Stage 1 Relay
 - Relay time delay is programmed in seconds
 - Relay processing time for this type of relay is known based on testing
 - No interposing auxiliary relays in circuit
 - No communication systems used in the circuit
 - Breaker interrupting rated at 5 cycles @ 60 Hz

UFLS Table 1: Eastern Interconnection					
Distribution Providers and Transmission Owners with 100 MW ² or more of peak net Load shall implement a UFLS program with the following attributes:					
UFLS Stage	Frequency Threshold (Hz)	Minimum Relay Time Delay (s)	Total Nominal Operating Time (s) ¹	Load Shed at Stage as % of TO or DP Load	Cumulative Load Shed as % of TO or DP Load
1	59.5	0.10	0.30	6.5 – 7.5	6.5 – 7.5

1. The total nominal operating time includes the underfrequency relay operating time plus any interposing auxiliary relay operating times, communication times, and the rated breaker interrupting time. The underfrequency relay operating time is measured from the time when frequency passes through the frequency threshold setpoint, using a test rate of frequency decay of 0.2 Hz per second. If the relay operating time is dependent on the rate of frequency decay, the underfrequency relay operating time and any subsequent testing of the UFLS relays shall utilize a test rate of linear frequency decay of 0.2 Hz per second.





PRC-006-NPCC-2

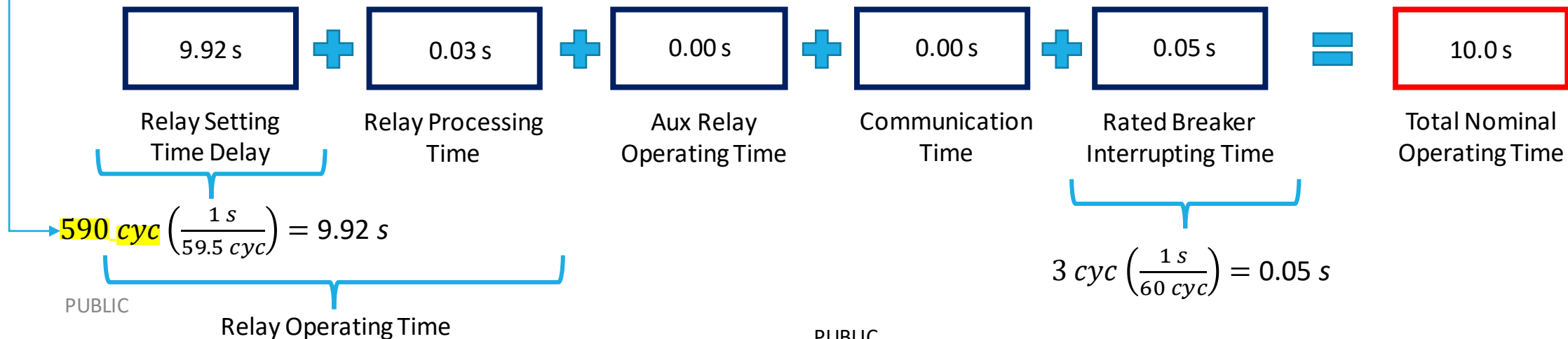
Automatic Underfrequency Load Shedding

Total Nominal Operating Time

- Example 2
 - Stage 5 Relay
 - Relay time delay is programmed in **cycles**
 - Relay processing time for this type of relay is known based on testing
 - No interposing auxiliary relays in circuit
 - No communication systems used in the circuit
 - Breaker interrupting rated at 3 cycles @ 60 Hz

UFLS Table 1: Eastern Interconnection					
Distribution Providers and Transmission Owners with 100 MW ² or more of peak net Load shall implement a UFLS program with the following attributes:					
UFLS Stage	Frequency Threshold (Hz)	Minimum Relay Time Delay (s)	Total Nominal Operating Time (s) ¹	Load Shed at Stage as % of TO or DP Load	Cumulative Load Shed as % of TO or DP Load
5	59.5	0.10	10.0	2 - 3	29.5 – 31.5

1. The total nominal operating time includes the underfrequency relay operating time plus any interposing auxiliary relay operating times, communication times, and the rated breaker interrupting time. The underfrequency relay operating time is measured from the time when frequency passes through the frequency threshold setpoint, using a test rate of frequency decay of 0.2 Hz per second. If the relay operating time is dependent on the rate of frequency decay, the underfrequency relay operating time and any subsequent testing of the UFLS relays shall utilize a test rate of linear frequency decay of 0.2 Hz per second.





PRC-006-NPCC-2

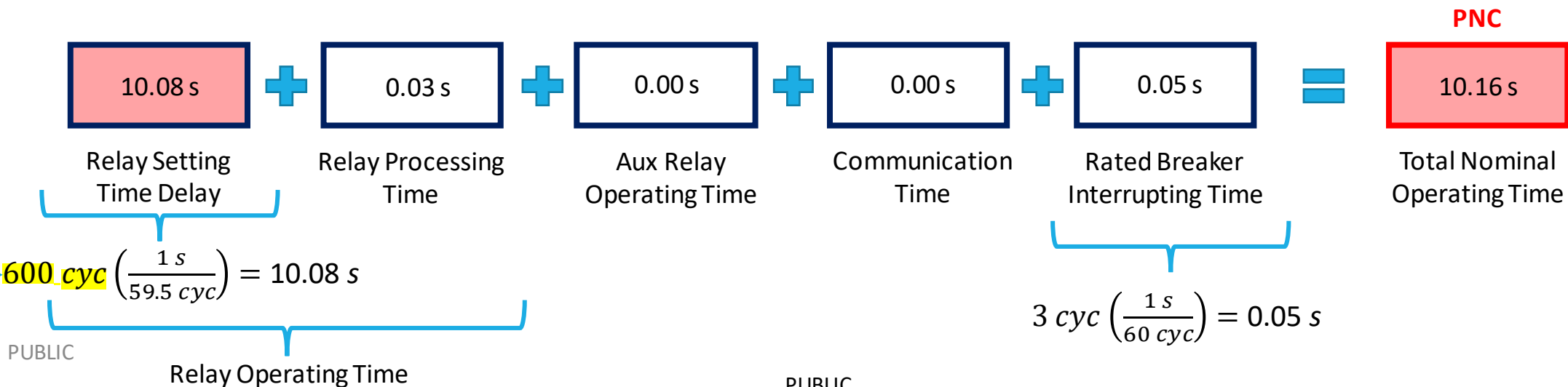
Automatic Underfrequency Load Shedding

Total Nominal Operating Time

- Example 3 (**Potential Noncompliance**)
 - Stage 5 Relay
 - Relay time delay is programmed in **cycles**
 - Relay processing time for this type of relay is known based on testing
 - No interposing auxiliary relays in circuit
 - No communication systems used in the circuit
 - Breaker interrupting rated at 3 cycles @ 60 Hz

UFLS Table 1: Eastern Interconnection					
Distribution Providers and Transmission Owners with 100 MW ² or more of peak net Load shall implement a UFLS program with the following attributes:					
UFLS Stage	Frequency Threshold (Hz)	Minimum Relay Time Delay (s)	Total Nominal Operating Time (s) ¹	Load Shed at Stage as % of TO or DP Load	Cumulative Load Shed as % of TO or DP Load
5	59.5	0.10	10.0	2 - 3	29.5 – 31.5

1. The total nominal operating time includes the underfrequency relay operating time plus any interposing auxiliary relay operating times, communication times, and the rated breaker interrupting time. The underfrequency relay operating time is measured from the time when frequency passes through the frequency threshold setpoint, using a test rate of frequency decay of 0.2 Hz per second. If the relay operating time is dependent on the rate of frequency decay, the underfrequency relay operating time and any subsequent testing of the UFLS relays shall utilize a test rate of linear frequency decay of 0.2 Hz per second.





PRC-006-NPCC-2

Automatic Underfrequency Load Shedding

Total Nominal Operating Time

Best Practices

- How to show compliance
 - Your relay setting design approach will be audited to ensure all factors in Footnote 1 are considered as part of the Total Nominal Operating Time
 - Relay settings will be audited to ensure frequency pickups and appropriate time delays are set accordingly to the UFLS Tables

UFLS Table 1: Eastern Interconnection

Distribution Providers and Transmission Owners with 100 MW² or more of peak net Load shall implement a UFLS program with the following attributes:

UFLS Stage	Frequency Threshold (Hz)	Minimum Relay Time Delay (s)	Total Nominal Operating Time (s) ¹	Load Shed at Stage as % of TO or DP Load	Cumulative Load Shed as % of TO or DP Load
1	59.5	0.10	0.30	6.5 – 7.5	6.5 – 7.5
2	59.3	0.10	0.30	6.5 – 7.5	13.5 – 14.5
3	59.1	0.10	0.30	6.5 – 7.5	20.5 – 21.5
4	58.9	0.10	0.30	6.5 – 7.5	27.5 – 28.5
5	59.5	0.10	10.0	2 - 3	29.5 – 31.5

1. The total nominal operating time includes the underfrequency relay operating time plus any interposing auxiliary relay operating times, communication times, and the rated breaker interrupting time. The underfrequency relay operating time is measured from the time when frequency passes through the frequency threshold setpoint, using a test rate of frequency decay of 0.2 Hz per second. If the relay operating time is dependent on the rate of frequency decay, the underfrequency relay operating time and any subsequent testing of the UFLS relays shall utilize a test rate of linear frequency decay of 0.2 Hz per second.
2. Peak net load shall be calculated as an average of the peak net load from the previous 3 years, excluding the current year.



PRC-006-NPCC-2

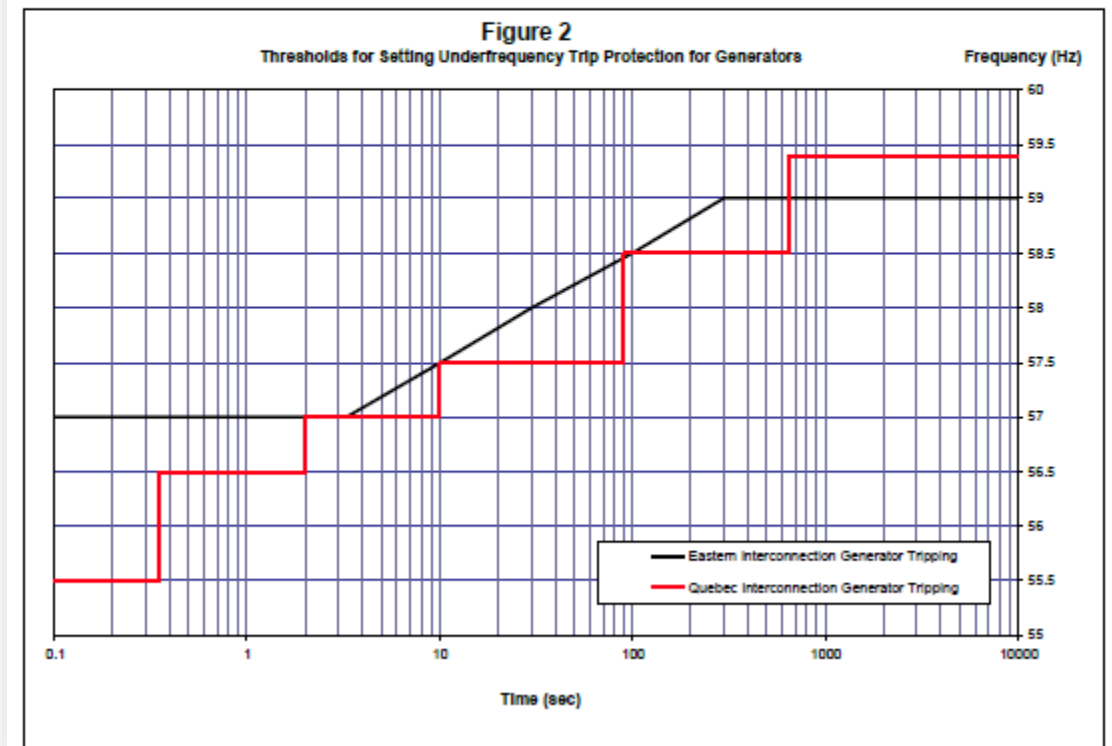
Automatic Underfrequency Load Shedding

Requirement 10

Generator Owners

Set each generator underfrequency trip relay if so equipped, on or below the appropriate generator underfrequency trip protection setting threshold curve in Figure 2, except as otherwise exempted in Requirements R13 and R16

Figure 2
PRC-006-NPCC-2
Underfrequency Load Shedding Program – Thresholds for Setting Underfrequency
Trip Protection for Generators





PRC-006-NPCC-2

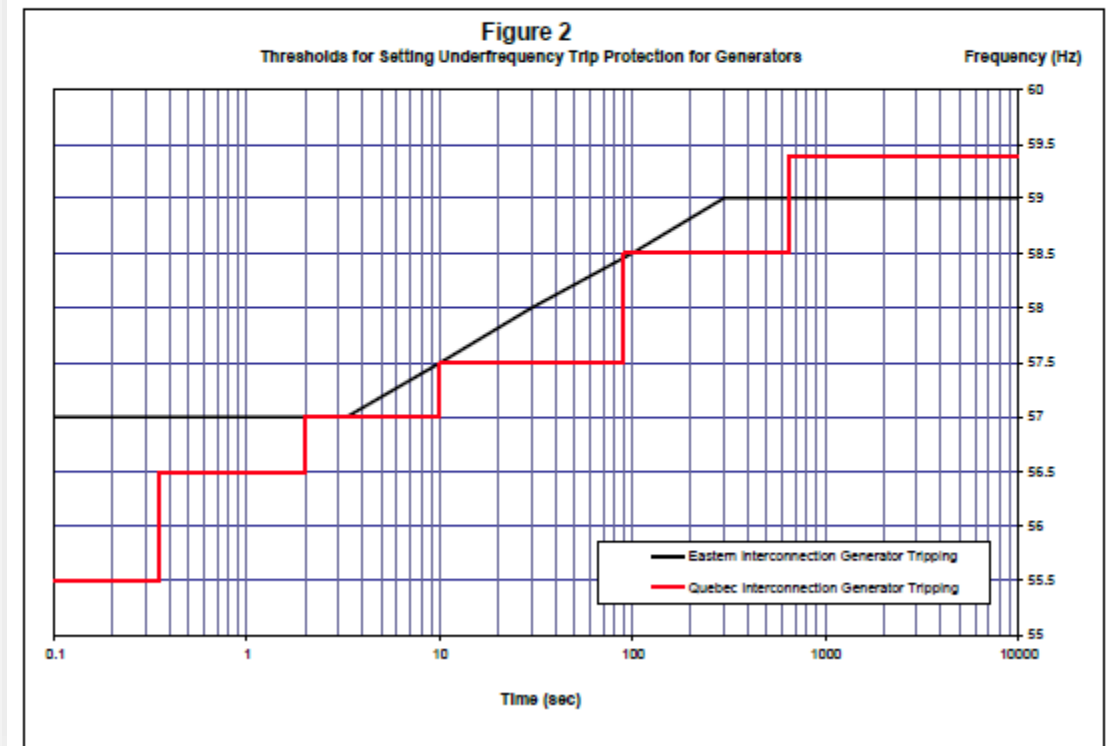
Automatic Underfrequency Load Shedding

Requirement 10

Best Practices

- Review generator step-up transformer protection relays for underfrequency elements
- Review line protection relays for underfrequency elements
- All underfrequency relays, regardless of their specific zone of protection, if enabled and set to trip a generator offline would be in scope of Requirement 10

Figure 2
PRC-006-NPCC-2
Underfrequency Load Shedding Program – Thresholds for Setting Underfrequency Trip Protection for Generators



Questions?

PRC Compliance Best Practices and Lessons Learned

Patrick Palompo, PE
Senior Compliance Engineer



CIP-012 Communications Between Control Centers SGAS RECAP

Michael Bilheimer
Senior CIP Analyst

NPCC 2022 Spring Compliance and Reliability Webinar





CIP-012-1 Is Upon Us!

EFFECTIVE
DATE:
7/1/2022

KEY RESOURCES

- ERO Endorsed CIP-012-1 Compliance Guidance
- NPCC Whitepaper on NERC Reliability Standard CIP-012 (Not ERO Endorsed)
- NERC CIP-012 Small Group Advisory Session Webinar | Presentation | Streaming Webinar
 - NERC CIP-012 FAQ document (Under Development)
 - CIP-012 RSAW
- Texas RE 2022 Spring Standards Workshop Presentation | Streaming Webinar
- **Contact NPCC Compliance: compliance-support@npcc.org**



CIP-012 Goal

Purpose: To protect the confidentiality and integrity of Real-time Assessment and Real-time monitoring data transmitted between Control Centers

NERC Definition: One or more facilities hosting operating personnel that monitor and control the Bulk Electric System (BES) in real-time to perform the reliability tasks, including their associated data centers, of:

- 1) a Reliability Coordinator,
- 2) a Balancing Authority,
- 3) a Transmission Operator for transmission Facilities at two or more locations, or
- 4) a Generator Operator for generation Facilities at two or more location

Applicability: BA, GO, GOP, RC, TOP, TO



CEC and Exclusions

CEC

- **NERC Glossary of terms**

Exclusions

- 4.2.1 Canadian Nuclear Safety Commission.
- 4.2.2 Nuclear Regulatory Commission
- 4.2.3 A Control Center that transmits to another Control Center Real-time Assessment or Real-time monitoring data pertaining only to the generation resource or Transmission station or substation co-located with the transmitting Control Center.



Protected Communication Communications

Communication between
Control Centers

- Communication paths and all way points or hops and skips

Facility to Facility
Communication

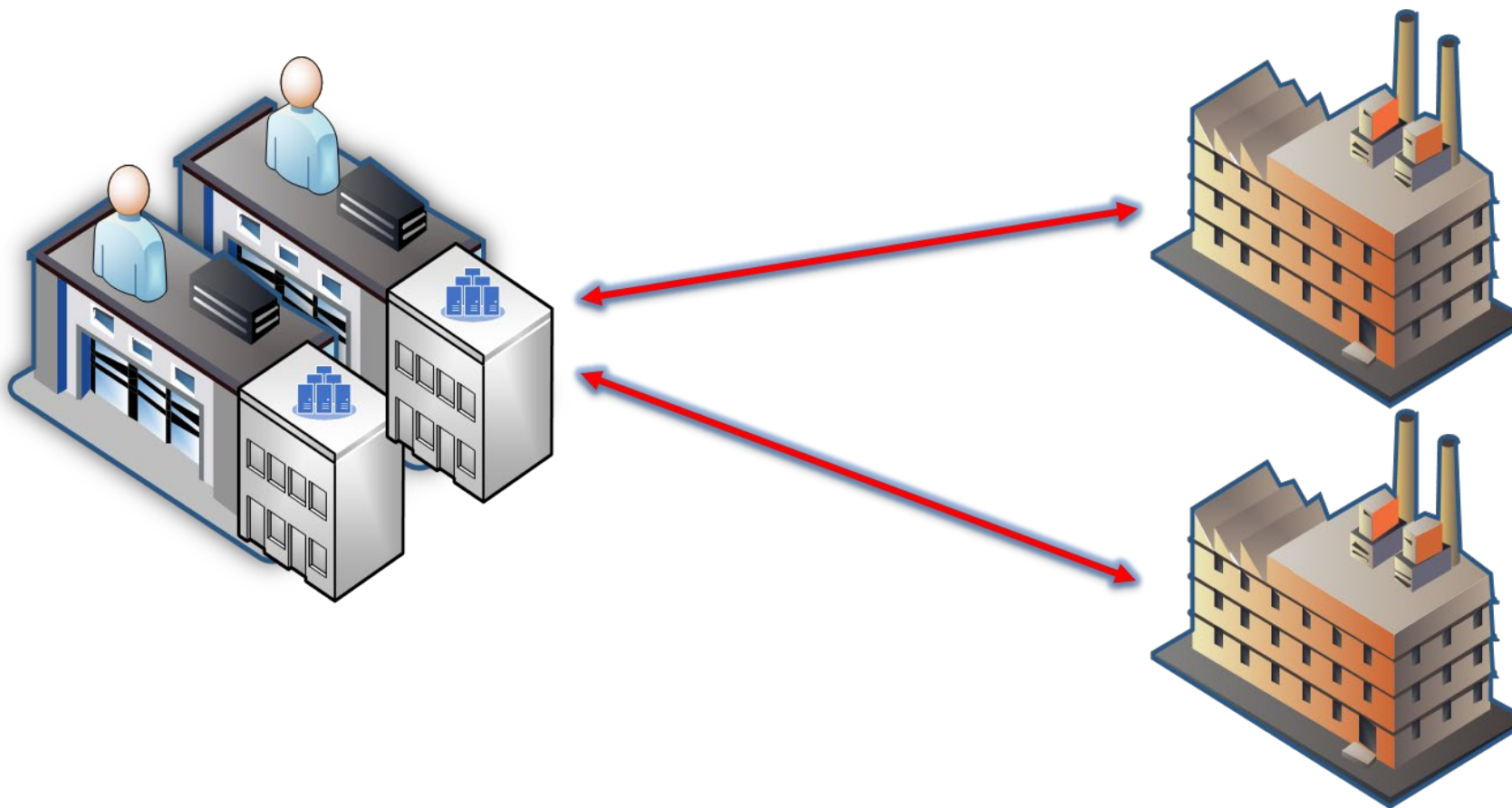
- Logical, physical, and other protections

RTA/RTM

- IRO-010-3 | TOP-003-4 | NPCC Whitepaper on NERC Reliability Standard CIP-012, Page 9



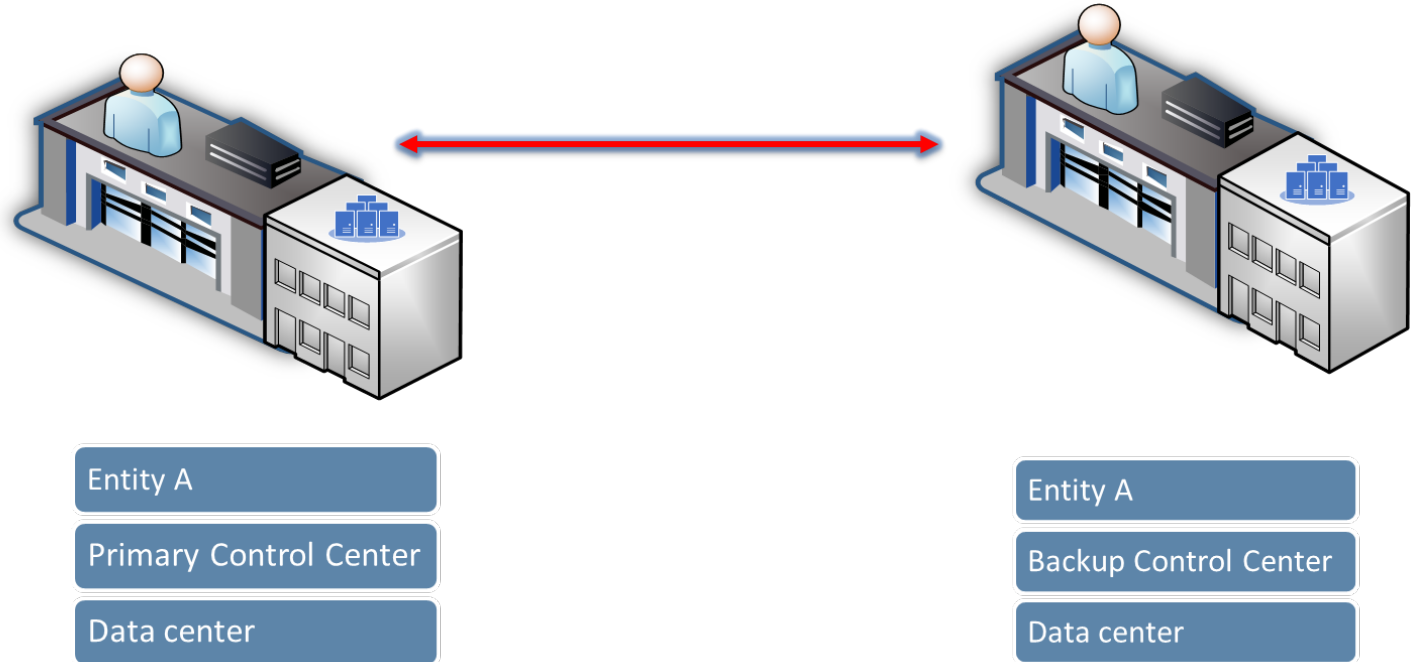
Control Centers Definition Visualization





Traditional Entity Layout

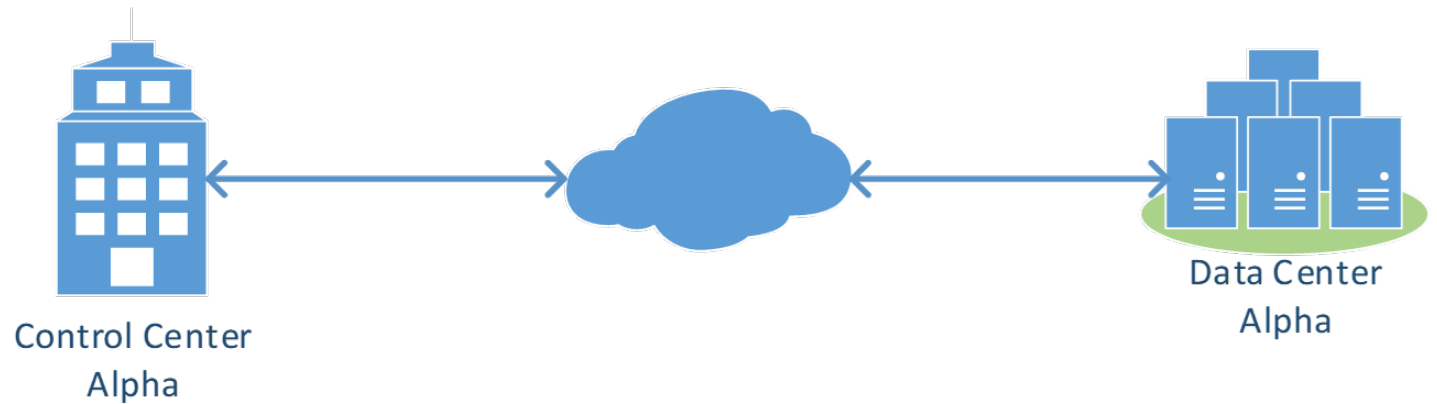
- Entity has a PCC and ACC
- Internal to the entity communication paths.





Control Center Communicating with an Associated Data Center

- Path between Locations need to be protected.
- Any Communication Transfer or waypoints need to be defined in the CIP-012 Plan.

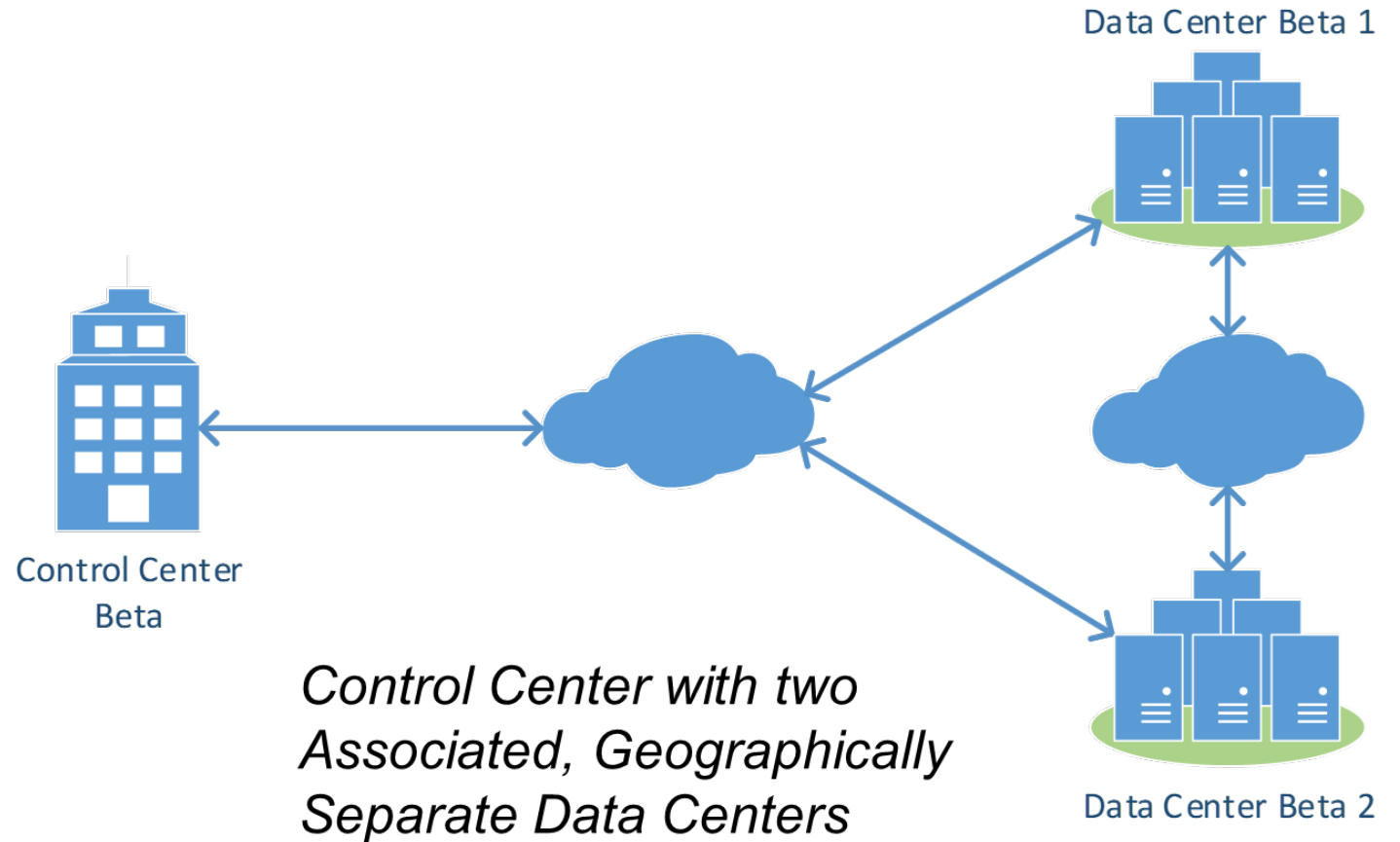


*Control Center with an
Associated, Geographically
Separate Data Center*



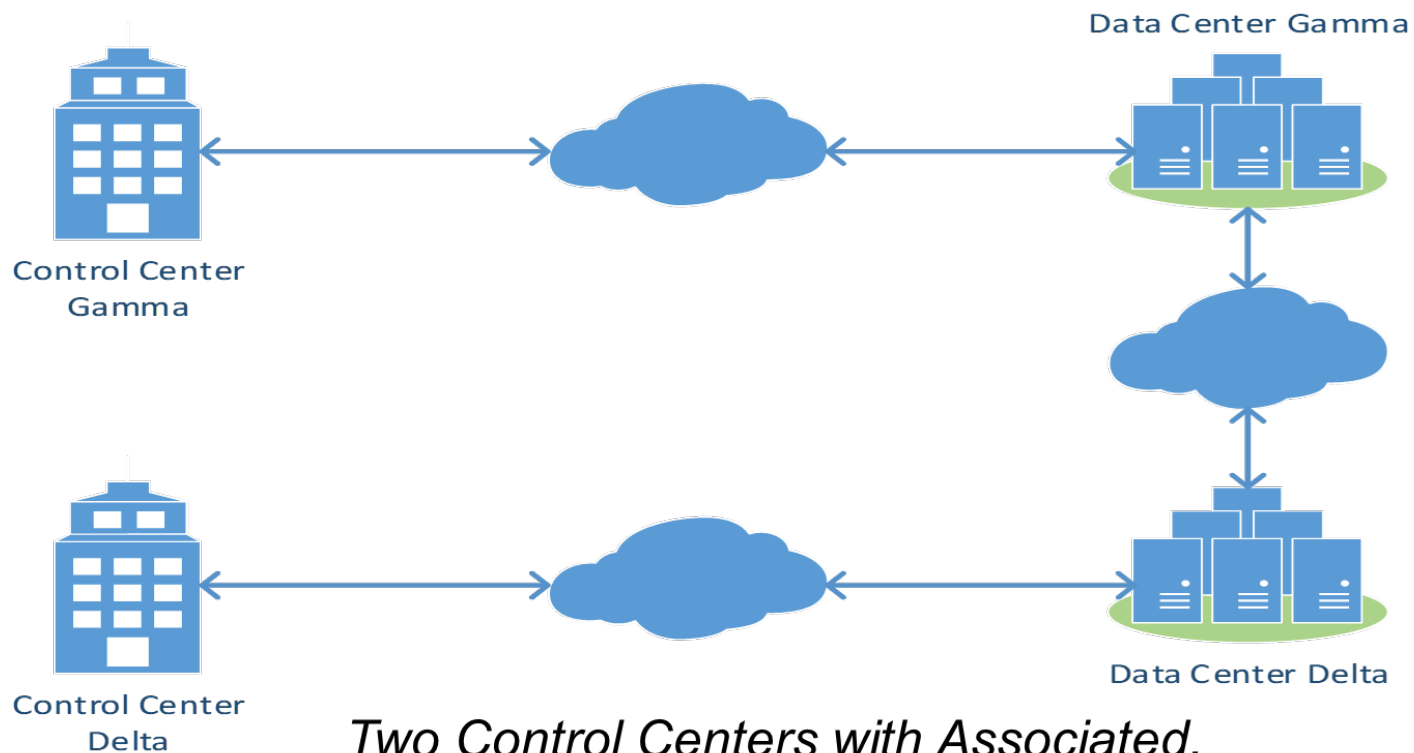
Control Center with Multiple Data Centers

- RTA/RTM Communication from Control center to Data centers
- RTA/RTM Communication between Data centers need to be protected.
- Hops and Skips in the communication path need to be accounted for.





RTA/RTM Data
being
Exchanged by
Data Centers

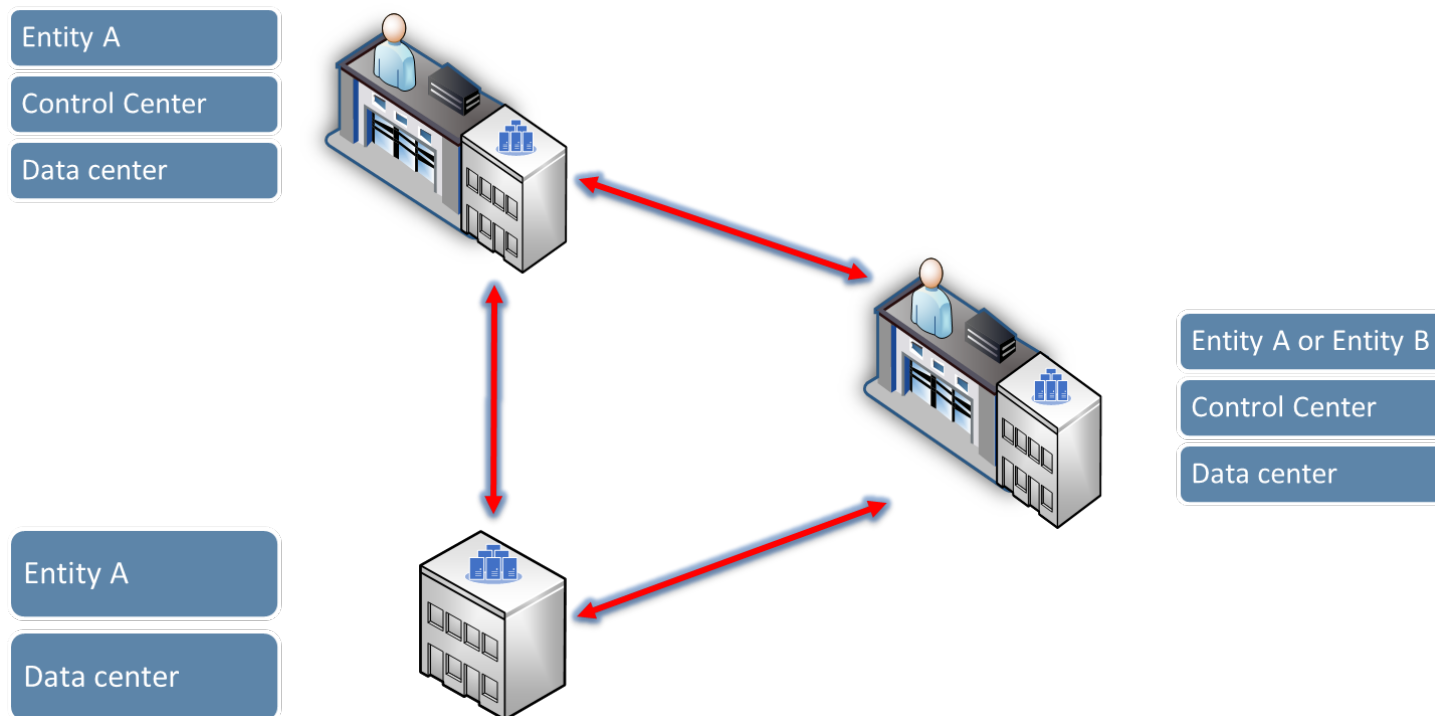


*Two Control Centers with Associated,
Geographically Separate Data Centers*



Entity RTA\RTM Communication Scenario

- Internal Entity communication
or
- Entity to Entity communication





RTM Data SGAS CIP-012 FAQ

Covers CIP-12 Questions about:

Scope

Agreements

Audit Approach

CIP Exceptional Circumstances (CEC)

Control Center

Controls

EIDSN

Enforcement

Evidence

Hops and Skips

Implementation

Plan

Risk

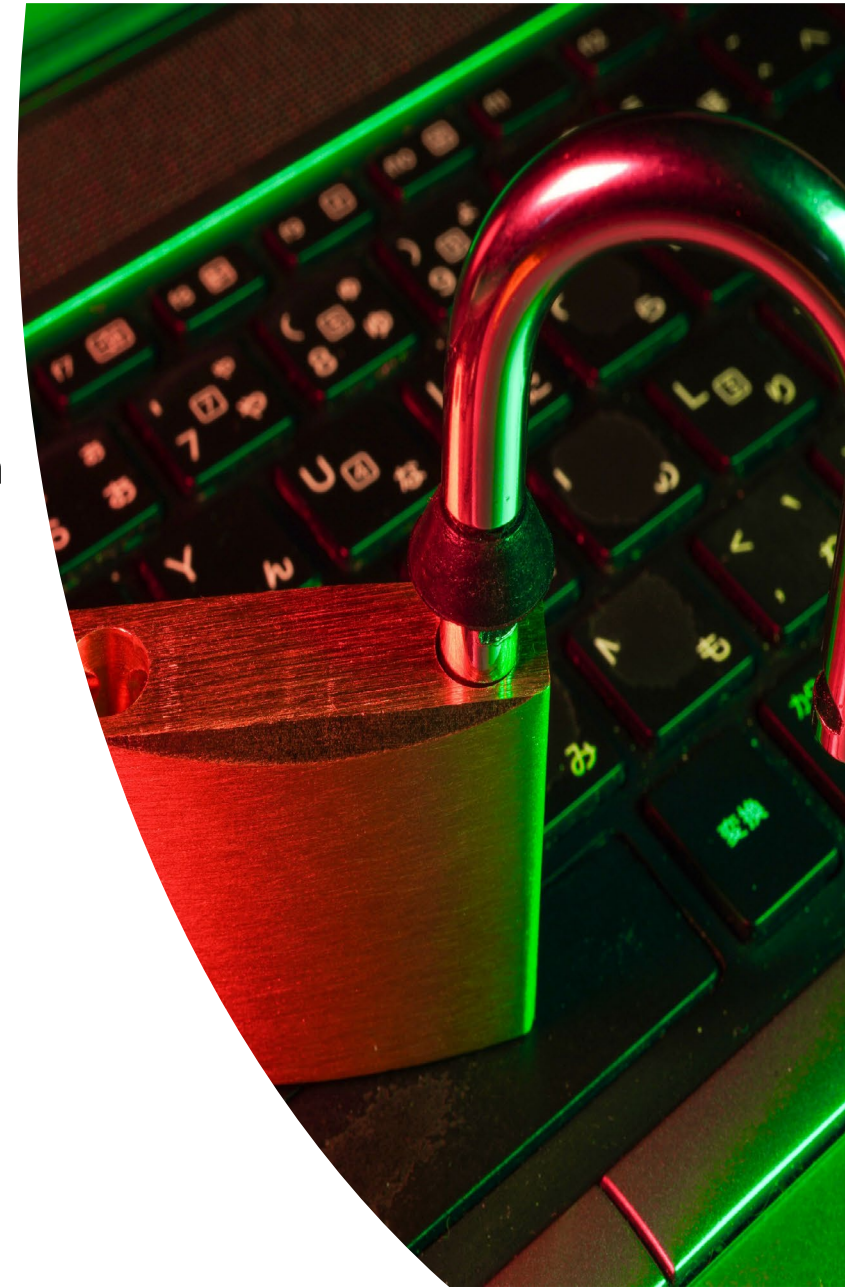


Protections

- Identification of security protection used to mitigate the risks posed by unauthorized disclosure and unauthorized modification of Real-time Assessment and Real-time monitoring data while being transmitted between Control Centers;

Protect | Monitor | Detect | Alert | Respond

- **Encryption**
 - Vendor Encryption: EIDSN
 - Entity Applied Encryption
- **Physical Protections**
 - Walls, Conduit, Alarming, Monitoring, Physical Structures
- **Internal Controls**
 - Network Monitoring





CIP-012-1 RSAW

- NEC Published by NERC on May 3, 2022

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Reliability Standard Audit Worksheet¹

CIP-012-1 – Cyber Security – Communications between Control Centers

This section to be completed by the Compliance Enforcement Authority.

Audit ID: Audit ID if available; or REG-NCRnnnnn-YYYYMMDD
Registered Entity: Name of Registered Entity being audited
NCR Number: NCRnnnnn
Compliance Enforcement Authority: Region or NERC performing audit
Compliance Assessment Date(s)²: Month DD, YYYY, to Month DD, YYYY
Compliance Monitoring Method: [On-site Audit | Off-site Audit | Spot Check]
Names of Auditors: Supplied by CEA

Applicability of Requirements

	BA	DP	GO	GOP	PA/PC	RC	RP	RSG	TO	TOP	TP	TSP
R1	X		X	X		X			X	X		

Legend:

Text with blue background:	Fixed text – do not edit
Text entry area with green background:	Entity-supplied information
Text entry area with white background:	Auditor-supplied information



Compliance Approach

Verify the entity has applicable controls centers.

Verify RTA/RTM Data being exchanged between control Centers.

Documented Plans to Mitigate unauthorized disclosure and modification .

Identification of Security Protections.

Where the entity has applied security protections.

Verify security protections are applied to control center communications between different entities.

Implementation of CIP-012 security plan.

Verify that the entity CIP-012 plan achieves the objective of mitigation unauthorized disclosure and unauthorized modification.

Verify any CEC that are declared by CIP-012 Adhere to Entity Cyber Security Policy.



Compliance Evidence

What do you consider
RTA/RTM?
(R1.1)

Identification of
Security protections
used in the
communication Route?
(R1.2)

Are you a Control Center and whom are
you communication with?
(R1.3)

List of
communication
Data you protect

Justification
for Inclusion
or Exclusion

Logical,
Physical,
Monitoring,
Other
Controls
and
protections

Procedures,
Diagrams
with Security
Demarcations

Entity
Assessment

Identification of
connected
control centers
and
Communication
Paths

Agreement/
MOU with
between
entities



Controls

Set review of connected Control centers

Set review what is RTA/RTM

Set Review time frame of Encryption or Security protocols.

Encryption Key Management

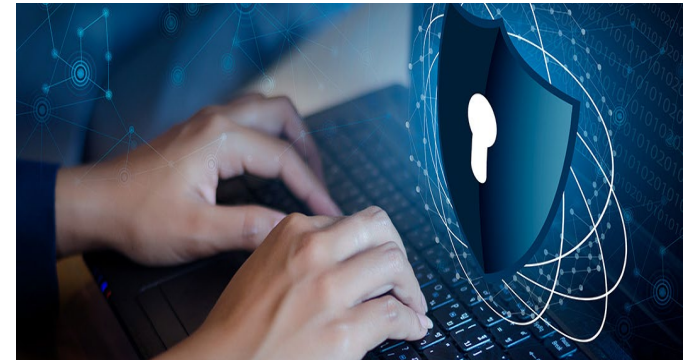
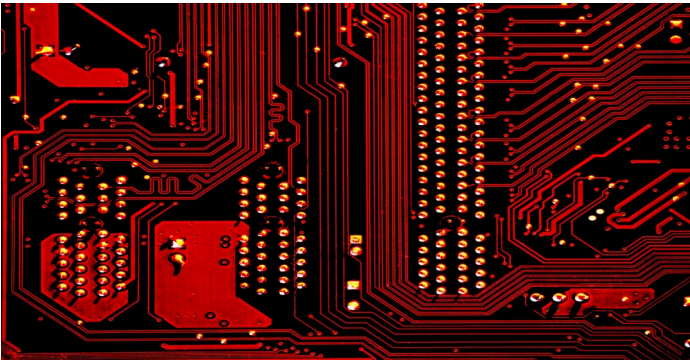
List of Security controls: Network monitoring, Network Configurations, Network diagrams, physical protections, Physical Perimeter diagrams, Change of Security Controls Demarcation.



Controls Continued

Auditing or reassessment of Third-Parties

Is unauthorized disclosure and unauthorized modification in your Incident Response Plan?







NORTHEAST POWER COORDINATING COUNCIL, INC.

Dedicated to bulk power system reliability in Northeastern North America



Break

PUBLIC

Compliance Monitoring Program Updates

Jacqueline Jimenez
Director, Compliance

Emily Stuetzle
Senior CIP Analyst





Agenda

Standards Update

CIP ERT v6 Update

NP Verify

Internal Controls RFI Update

Hybrid On-site Audits



Standards Update

July 1, 2022

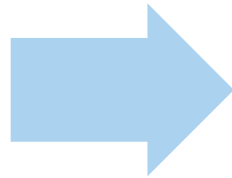
- **New Standard:** CIP-012-1 – Cyber Security – Communications between Control Centers
- PRC-002-2 — Disturbance Monitoring and Reporting Requirements
 - 100% compliance for Requirements R2 – R4, R6 – R11



Standards Update

CIP-005-6

- Current version
- Effective
October 1, 2020



CIP-005-7

- New version
- Effective
October 1, 2022



Standards Update

CIP-005-7 Changes

Added R3 which is
applicable to:

EACMS and PACS associated with High Impact BES
Cyber Systems

EACMS and PACS associated with Medium Impact BES
Cyber Systems with External Routable Connectivity

New Requirement R3
Part 3.1

Requirement: Have one or more method(s) to
determine authenticated vendor-initiated remote
connections.

New Requirement R3
Part 3.2

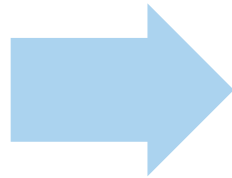
Requirement: Have one or more method(s) to
terminate authenticated vendor-initiated remote
connections and control the ability to reconnect.



Standards Update

CIP-010-3

- Current version
- Effective
October 1, 2020



CIP-010-4

- New version
- Effective
October 1, 2022



Standards Update

CIP-010-4 Changes

Added to the
*Applicable
Systems* for
R1.6:

High Impact BES Cyber
Systems and their associated:

1. EACMS; and

2. PACS

Medium Impact BES Cyber
Systems and their associated:

1. EACMS; and

2. PACS

Note: Implementation does not require the Responsible Entity to renegotiate or abrogate existing contracts (including amendments to master agreements and purchase orders). Additionally, the following issues are beyond the scope of Part 1.6: (1) the actual terms and conditions of a procurement contract; and (2) vendor performance and adherence to a contract.

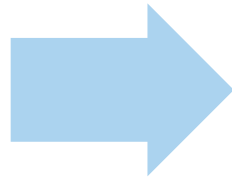
No change to the requirement language itself



Standards Update

CIP-013-1

- Current version
- Effective
October 1, 2020



CIP-013-2

- New version
- Effective
October 1, 2022



Standards Update

CIP-013-2 Changes

Added EACMS and PACS to Requirement R1 Header:

Each Responsible Entity shall develop one or more documented supply chain cyber security risk management plan(s) for high and medium impact BES Cyber Systems **and their associated EACMS and PACS**. The plan(s) shall include:

Requirement R1 Part 1.1

One or more process(es) used in planning for the procurement of BES Cyber Systems **and their associated EACMS and PACS** to identify and assess cyber security risk(s) to the Bulk Electric System from vendor products or services resulting from: (i) procuring and installing vendor equipment and software; and (ii) transitions from one vendor(s) to another vendor(s).

Requirement R1 Part 1.2

One or more process(es) used in procuring BES Cyber Systems, **and their associated EACMS and PACS**, that address the following, as applicable:

Requirement R1 Part 1.2.5

Verification of software integrity and authenticity of all software and patches provided by the vendor for use in the BES Cyber System **and their associated EACMS and PACS**; and

Requirement R1 Part 1.2.6

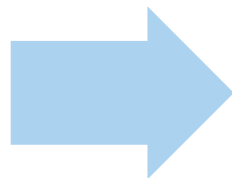
Coordination of controls for ~~(i) vendor-initiated~~ **Interactive remote access.** ~~and (ii) system-to-system remote access with a vendor(s).~~



Standards Update

PRC-024-2

- Current version
- Effective
July 1, 2016



PRC-024-3

- New version
- Effective
October 1, 2022



Standards Update

PRC-024-3 Changes

Expanded the Applicability Section: Facilities Section added that explicitly lists protective functions for specific equipment

Plant Auxiliary Equipment is not included as an applicable facility

Specifies that voltage and frequency protection should be applied to both generator step-up (GSU) and collector transformers

Includes TOs and PCs as Functional Entities

Quebec Interconnection only

Requirements R1 and R2 modified to specify that a generating resource may neither trip NOR enter momentary cessation inside the No Trip Zone

Diagrams in the Attachments updated to clarify the area outside the "No Trip Zone" is not a "Must Trip Zone."

Removed the term "point of interconnection" and replaced with "at the high side of the GSU or collector transformer."



Standards Update

January 1, 2023

- TPL-007-4 R3, R4, R8
- [Phased-in Implementation Plan](#)

April 1, 2023

- EOP-011-2 Emergency Preparedness and Operations
- IRO-010-4 Reliability Coordinator Data Specification and Collection
- TOP-003-5 — Operational Reliability Data

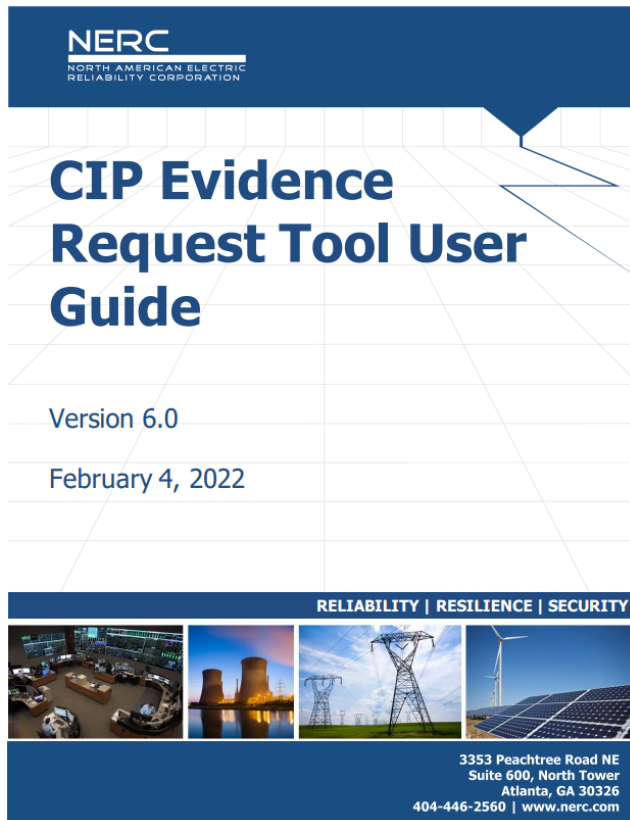
July 1, 2023

- TPL-001-5.1 — Transmission System Planning Performance Requirements



NORTHEAST POWER COORDINATING COUNCIL, INC.

CIP ERT v6 Update



Sent with audit
notification package



Available on NERC
website



[CIP ERT Version 6.0
User Guide](#)

[v5 to v6.0 Change List](#)



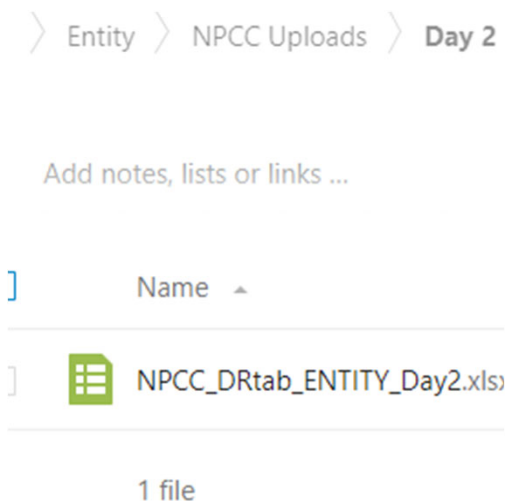
CIP ERT v6 Update

1	Sample Set	Requ
26	CA-L2-06	CIP-005-
27	CA-L2-07	CIP-006-
28	CA-L2-08	CIP-006-
		CIP-006-
		CIP-006-
		CIP-006-
	PSP-L2-01	CIP-006-
		CIP-006-
		CIP-006-

Updated Sample Set naming convention

1	Level	DR #	Standard	Req.
157	4	156	CIP-007	R4.4
158	4	157	CIP-010	R1.6
	Day1	158	CIP-002	R1

Added “Level” Column in NPCC tab



Separated NPCC tab from ERT after L2



ERT Common Errors

Cyber Asset Function	If C...
Inter-Control Center Communic...	
Infrastructure Support	
Intelligent Electronic Device (IED)	
Intelligent Instrumentation	
Intermediate System	
Intrusion Detection System (IDS)	
Intrusion Prevention System (IPS)	
Management Console	

Cyber Asset Function –
Intermediate System

Is IRA Enabled to this CA?	Is Vendor Remote Access Enabled to this CA?

Is IRA Enabled to this CA?

A	B	C	D	E	
Level	DR #	Standard	Req.	Internal Control Question	
	1	CIP-002	R1		If you Asse Cybe class
2					Prov com the o Cent GOF 002
	2	CIP-002	R1		
... Level 2 NPCC Sample Sets					

NPCC tab Level 2 requests



ERT Common Errors

15			
16	CIP-TFE-L1-01		
17	CIP-CEC-L1-01		
18	CIP-SRP-L1-01		
19	CIP-EOL-L1-01		
Ready Confidential Information			

Missing the four general
Level 1 requests

Electronic Security Perimeter(s)	
ESP Description	Network Address

Missing ESP address spaces

IP Address	ESP [If A]
172.16.xx.yy, 172.16.xx.zz 172.16.100.11/ 172.	ESP1 ESP1

Multi-line entries



ERT Common Errors

ESP ID [If Any] ▼	
ESP One	

Index ▼	ESP ID
1	ESP1
2	ESP2
3	
4	

CA tab ESP ID not matching
an entry on the ESP tab

C			
id ▼	Cyber Asset ID ▼	Cyber Asset Classification ▼	Impact Rati
1	Asset1	BCA	High
2	Asset2	Don't tread on me	High
3	Asset3	BCA	Medium-ish
4			
5			
6			
7			

Altering the ERT



NP Verify



App to verify that network configs
will properly import into NP-View

<https://network-perception.com>



Network-Perception support will be
limited with the ERO SEL

<https://network-perception.com/kb/firewalls-routers-switches>



Internal Controls RFI Update



NPCC assess internal controls as part of monitoring engagements.

- Pre-audit RFI
- RFIs during evidence review



New - NPCC may have additional high level internal controls questions following the pre-audit RFI submittal.

- The additional internal controls RFI will be sent approximately 2 weeks after receipt of the pre-audit RFI submittal, which will be due with the RSAW and evidence submittal.



NPCC will continue to ask internal controls RFIs during the review of RSAWs and evidence, as needed.



Hybrid On-site Audits

On-site activity to resume



Expected to resume
in Q3 2022

Hybrid audit approach



- Virtual interviews
- On-site inspections
 - Control Center tours
 - FAC-008
 - Cyber
- Small sub-set of audit team

Determine entity COVID-19 protocols



COVID-19 Protocol
Survey



NORTH

COORDINATING COUNCIL, INC.



Questions

Jacqueline Jimenez

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Emily Stuetzle

estuetzle@npcc.org

PUBLIC

FERC/ERO Protection System Commissioning Program Review Project

Rich Bauer

Associate Principal Engineer – Event Analysis

NPCC Compliance/Reliability Webinar

May 17, 2022

RELIABILITY | ACCOUNTABILITY



- **Efforts to reduce Misoperations resulting from less than adequate Protection System Commissioning**
 - **2015-2021 NERC SPCWG Issued Lessons Learned – Verification of AC Quantities**
 - **2017 IEEE WG I-25 guide Commissioning Testing of Protection Systems**
 - **2019 Analysis of Protection System Misops**



- **Process: Sample ‘Event Description’ and ‘Corrective Action’ MIDAS fields to determine PSC impact on Misops.**
- **Finding: 18 – 36% of Misops could be attributed to issues that PSC should have detected.**

Joint Review of Protection System Commissioning Programs

2021 FERC, NERC and REs Report

November 2, 2021



FEDERAL ENERGY REGULATORY COMMISSION



NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Prepared by the Staffs of the Federal Energy Regulatory Commission and the North American Electric Reliability Corporation and its Regional Entities

The matters presented in this staff report do not necessarily represent the views of the Federal Energy Regulatory Commission, its Chairman, or individual Commissioners, and are not binding on the Commission.

- **Eight registered entities and one PSC contractor.**
- **Selected based on geographical locations and performance data such as events and Misop rates.**
- **Surveys and Interviews on participants' PSC programs and Procedures.**
- **Used the IEEE PSRC WG I-25 guide as a benchmark.**
- **Team discussed and agreed upon the best practices, opportunities for improvement, and related recommendations.**



- NERC request to IEEE PSRC
- IEEE PSRC I-25 Working Group
- Report on Commission Testing Practices
- Report to serve as Industry Reference

IEEE PSRC, WG I-25

May 10, 2017

Commissioning Testing of Protection Systems

Assignment:

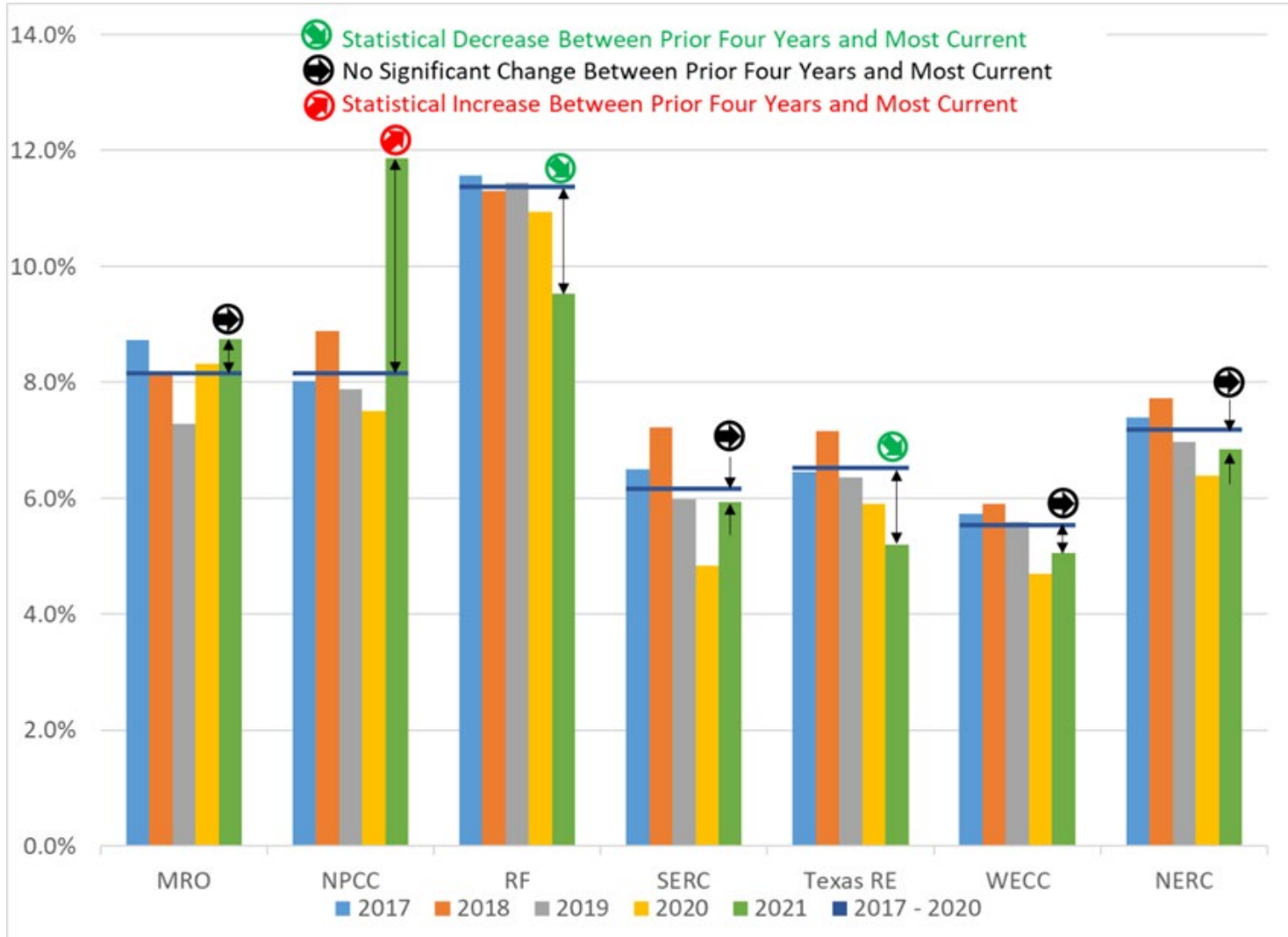
To create a report, at the request of the North American Electric Reliability Corporation (NERC) System Protection and Control Subcommittee (SPCS), to serve as an industry reference document on protection system testing practices. The SPCS believes that it would be beneficial for IEEE to produce a document on commissioning testing in an effort to help reduce the number of misoperations resulting from improper commissioning.

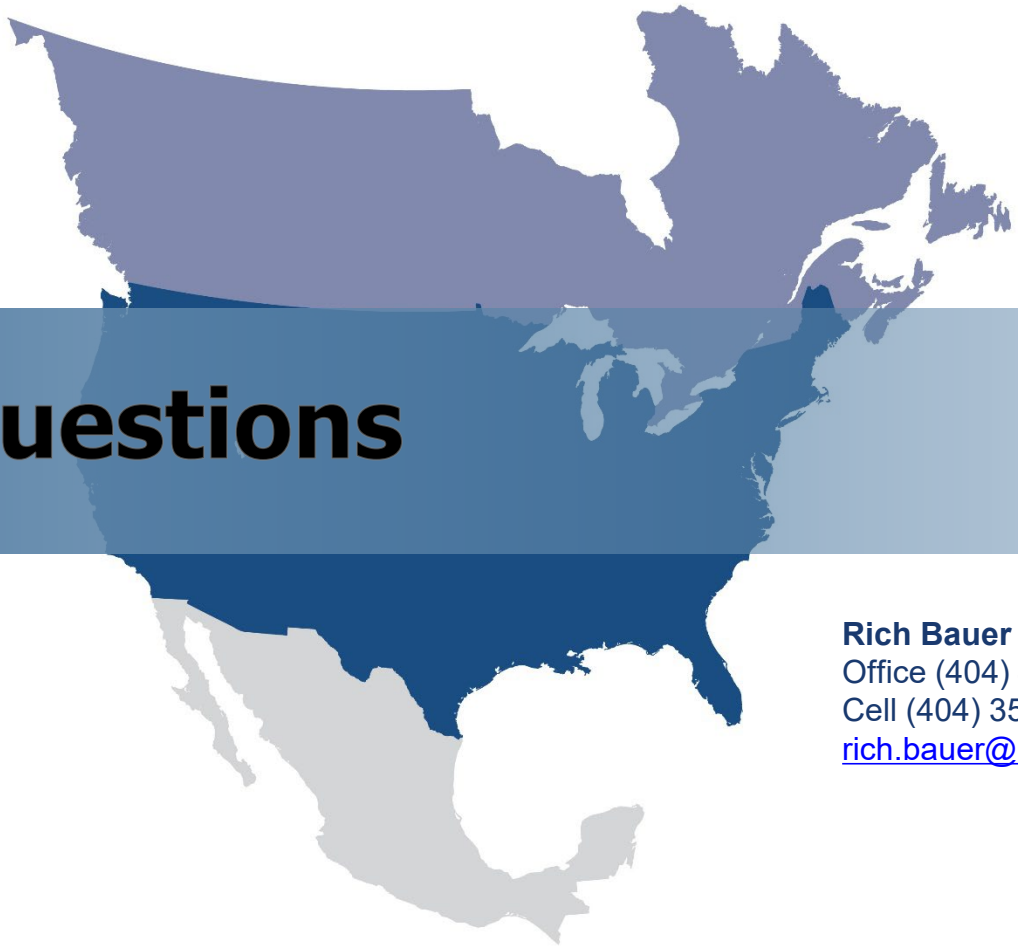
Working Group Members:

R. Garcia (Chair); K. Donahoe (Vice-Chair); R. Aguilar; A. Apostolov; H. Ashrafi; J. Barsch; N. Bilimoria; J. Brown; C. Bryant; D. Buchanan; E. Carvalheira; N. Casilla; G. Halt; W. Knappek; A. Lee; B. Mackie; H. Malson; B. Moores; G. Moskos; A. Newman; L. Polanco; S. Saminfri; E. Schock; T. Seegers; M. Siira; M. Stojak; A. Uribe; J. Verzose; D. Ware; M. Wright; V. Yedidi



- All participants but one had a formal commissioning program; however, none of the participants' programs were as comprehensive as the IEEE WG I-25 guide recommends.
- No participant maintained a centralized document that contained all five key elements of an effective PSC program.
- Recommendation
 - All entities should document a formal PSC program. Having a formal, documented program in a central location (e.g., a single document) allows easy reference to all the elements of the program.





Questions

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Cell (404) 357-9843

rich.bauer@nerc.net

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Aspects of Grid Transformation

Ensuring Reliability of the Electricity Ecosystem

Ryan D. Quint, PhD, PE

Senior Manager, BPS Security and Grid Transformation

North American Electric Reliability Corporation

May 2022

RELIABILITY | RESILIENCE | SECURITY





EXISTING U.S. GENERATION CAPACITY VS. INTERCONNECTION QUEUES

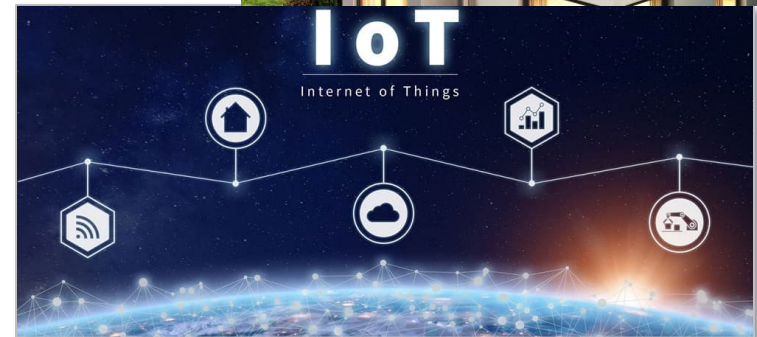


* Queue data represents about 85% of U.S. electric load; AK and HI and some non-RTO utilities not included.

- Synchronous generation retirement
- Inverter-based resource boom
 - Variability and uncertainty
- Need for flexibility
 - Battery energy storage systems
 - Hybrid plants
- BPS reliability impacts
 - Energy and resource adequacy
 - Essential reliability services
 - Reframing reliability considerations
 - Modeling and studies

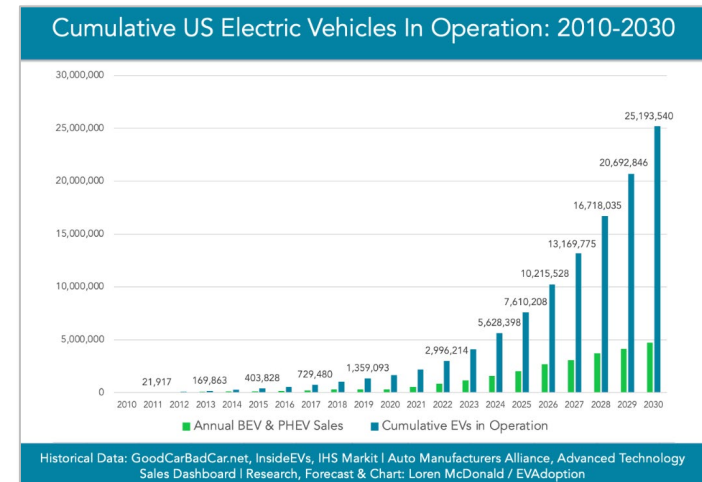
Source: [LBNL](#)

- Distributed Control
 - Prosumers
 - Smart meters
 - Demand-side management
 - Distributed energy resources
 - DER Aggregators
 - Microgrids
 - V2G and V2X
 - Grid edge analytics
 - Internet of Things
 - Industrial Internet of Things

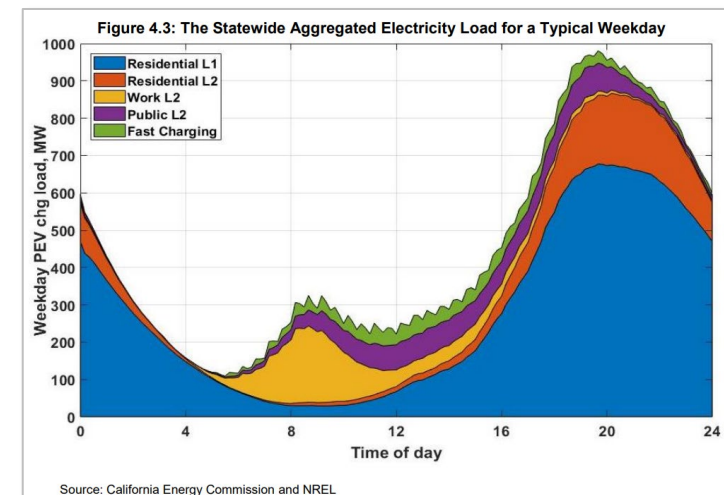


Source: [HP](#)

- Managed versus unmanaged charging
- Rapid or unexpected changes in demand
- Ramping implications
- Correlation with solar PV output
- Need for grid-friendly charging
- System implications and oscillations
- Fault ride-through performance
- System restoration and blackstart plans
- Power quality – harmonics and flicker
- V2G and V2X
- Participation in DER Aggregation

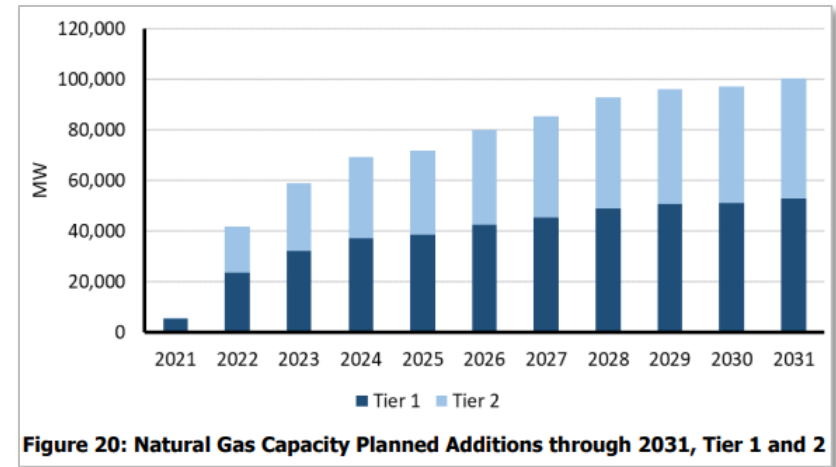


Source: [EV Adoption](#)



Source: [CEC](#)

- Natural gas supply
 - Possible winter reliability risks with disruption of supply in New England, California, and U.S. Southwest
 - “Just-in-time” fuel source
 - Lack of firm natural gas delivery to generators during peaks
 - Limited natural gas pipeline capacity and lack of redundancy
- Telecommunications
 - IT and operational technology (OT) uses
 - Linked to critical safety, reliability, and security functions





Virtualization

Turning hardware-based assets into “virtual” computer assets on a network. This is a common IT approach to virtual environments.



Cloud Computing

Moving on-premise assets to cloud infrastructure



Internet of Things

The vastly growing number of end devices that are connected to the internet and controllable in some manner.



Distributed Energy Resources

DERs (e.g., rooftop solar, distributed batteries) that are connected to the distribution system



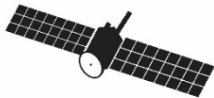
Artificial Intelligence and Machine Learning

Advanced machine learning driving new generation of “ideas” or “actions” based on computer learning techniques and decision making



Cellular 4G, 5G, 6G

Communications network advancement towards increased connectivity



Synchronized Timing

Synched times transferred from GPS (for example) to end devices so they all match times



Smart Sensors

End sensor devices that can do intelligent things without having to be centrally transmitted



Edge Analytics

Similar to smart sensors but where decision making is happening out on the edge of the network; not in a central location



Digital Twin

Replicating actual equipment with digital versions in computer models (A clone or mirror image of field equipment)



Blockchain

Used for securing transactions and databases primarily for banking but also in markets or utility payments, etc.



Quantum Computing

Super advanced computers that use “quantum technology”



Mobile Resources

Resources that can be hauled in and plugged in to help with resilience and severe grid conditions



Electric Vehicles

Consumer vehicles that operate entirely on electricity for fuel

Emerging technology:

A combination of techniques, skills, methods, or processes whose use, development, or practical application are largely unrealized, not widely adopted, in development, or otherwise still early in their demonstration and maturation.



- Are current planning, design, and operations practices sufficient with a future dominated by inverter-based resources, distributed energy resources, and grid-edge technologies?
- Are grid planners and operators preparing for multi-sector electrification and reliance on other critical infrastructures?
- Are we prepared for a rapidly evolving attack surface and to securely integrate emerging technologies?
- Can we more deeply integrate cyber and physical security aspects into engineering/business activities?
- How can we *proactively* prepare for the changing landscape in an agile, effective, and efficient manner to ensure reliable operation of the BPS?



Questions and Answers

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Senior Manager

BPS Security and Grid Transformation

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NPCC 2022 Outreach Activity

Gerry Dunbar

Director Reliability Standards and
Criteria

May 17, 2022





NPCC 2022 – 2025 Strategic Plan

Strategic Focus Area

Reliably Integrate Resources Brought Forward by Decarbonization Objectives

- NPCC DER/VER Forums
 - Sponsored by the Regional Standards Committee
 - Focused on Specific Decarbonization Topics
- DER/VER Forums --- 2022 Activity
 - May 2022 Impact of EV Charging on the BPS
 - Additional Forums --- August and October
 - Building Electrification



NPCC 2022 – 2025 Strategic Plan

Strategic Focus Area

Reliably Integrate Resources Brought Forward by Decarbonization Objectives

- NPCC DER/VER Guidance Document
 - Stakeholder Reporting Form
- Proliferation of DER on UFLS Distribution Feeders
- NPCC 2023 Regional UFLS Assessment



NPCC 2022 Planned Outreach Activity

Comments /Suggestions:

Gerry Dunbar
NPCC Director Standards and Criteria
GDunbar@NPCC.org

Ruida Shu
NPCC Manager Reliability Standards
RShu@NPCC.org

[NPCC 2022 Corporate Goals](#)

[DER Guidance Document](#)



Who's Who of NPCC CMEP Staff

Michael Bilheimer
Senior CIP Analyst

NPCC 2022 Spring Compliance and Reliability Webinar



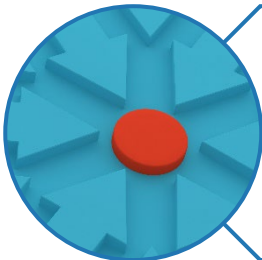
Presentation Goals



Go over staff updates.



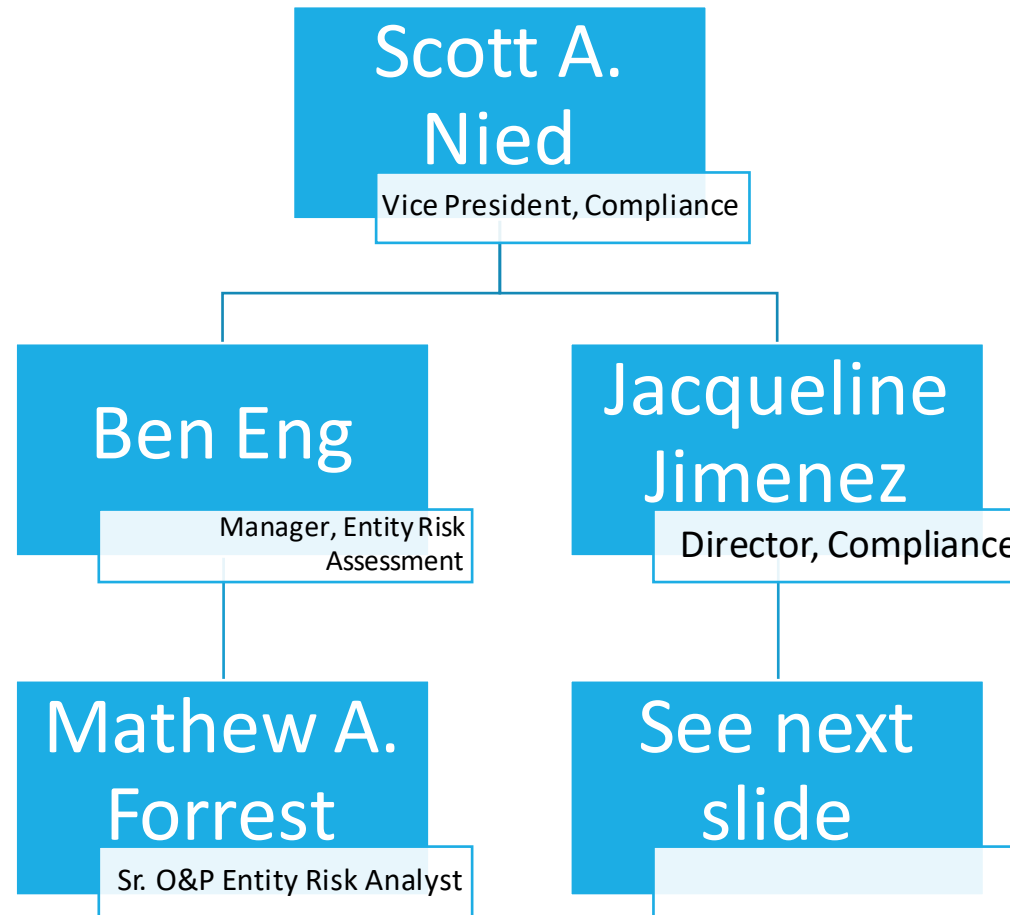
Inform Entities of who they can contact and talk to.



Focused on Compliance Monitoring and Enforcement Program (CMEP) Departments



Compliance Monitoring





Compliance Monitoring

Jacqueline Jimenez – *Director, Compliance*

O&P Auditors

- Daniel Kidney – *Senior Compliance Engineer*
- Duong Le – *Senior Compliance Engineer*
- George Dong – *Senior Compliance Engineer*
- Kimberly Griffith – *Senior Compliance Engineer*
- Mujahid Mian – *Senior Compliance Engineer*

CIP Auditors

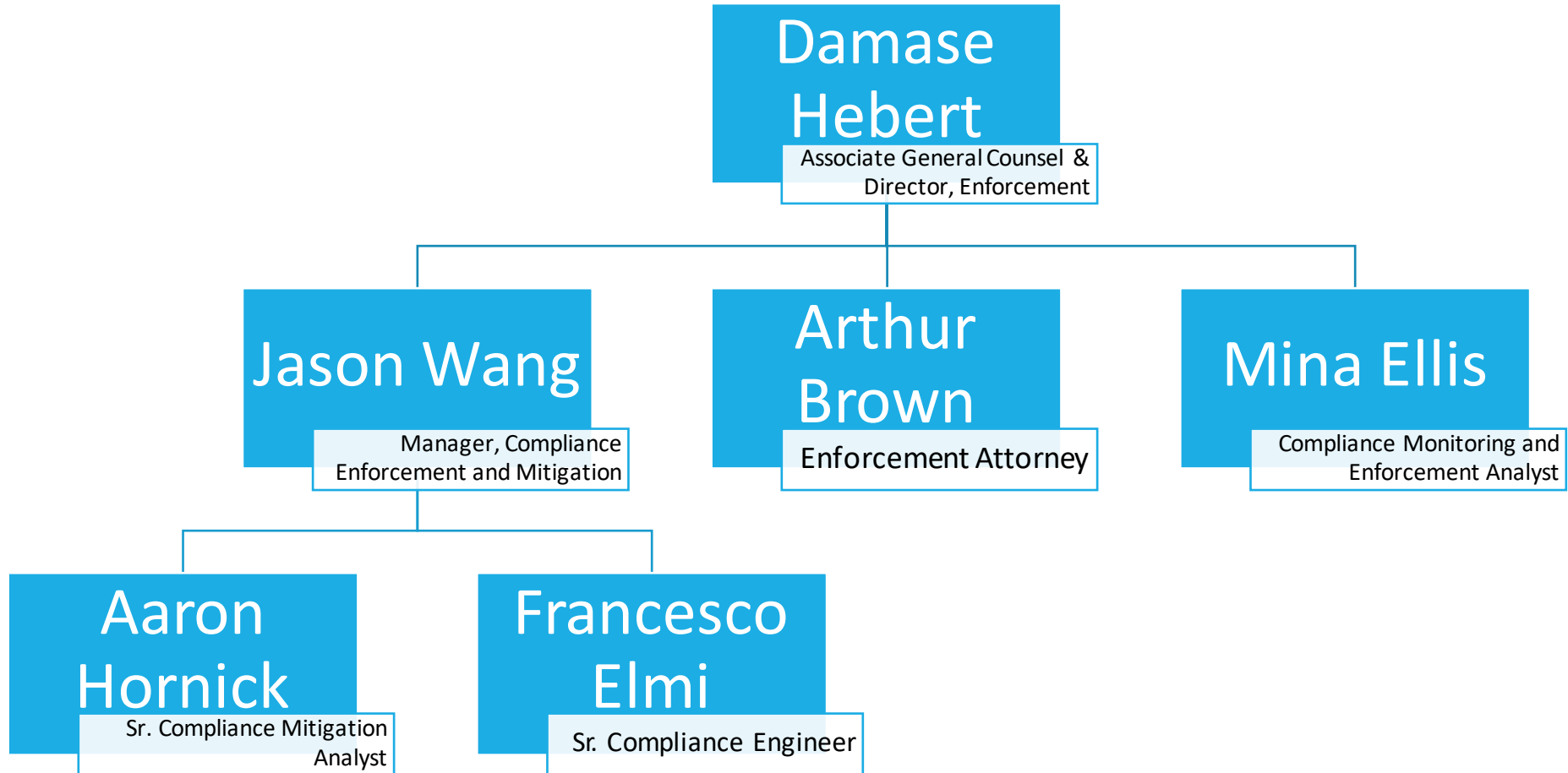
- Catherine Nakor-Tetteh – *Compliance Auditor*
- Cecil Elie – *Senior CIP Analyst*
- Emily Stuetzle – *Senior CIP Analyst*
- Michael Bilheimer – *Senior CIP Analyst*

CIP and O&P Auditors

- Patrick Palompo – *Senior Compliance Engineer*
- Travis Tate – *Senior Compliance Engineer*



Enforcement





CMEP Management Contacts

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Ben Eng

Manager, Entity Risk Assessment

- beng@npcc.org

Jason Wang

Manager, Compliance Enforcement and Mitigation

- jwang@npcc.org



NPCC Contacts

General Email Contacts:

- **Compliance:**
compliance-support@npcc.org
- **Bulk Electric System (BES):**
registration@npcc.org

General Phone Numbers:

- 212-840-1070
- 212-921-1040

Website:

- [NPCC Home Page](http://www.npcc.org)
- <https://www.npcc.org/about/contact-us>

