

Compliance and Certification Committee (CCC) Meeting Report

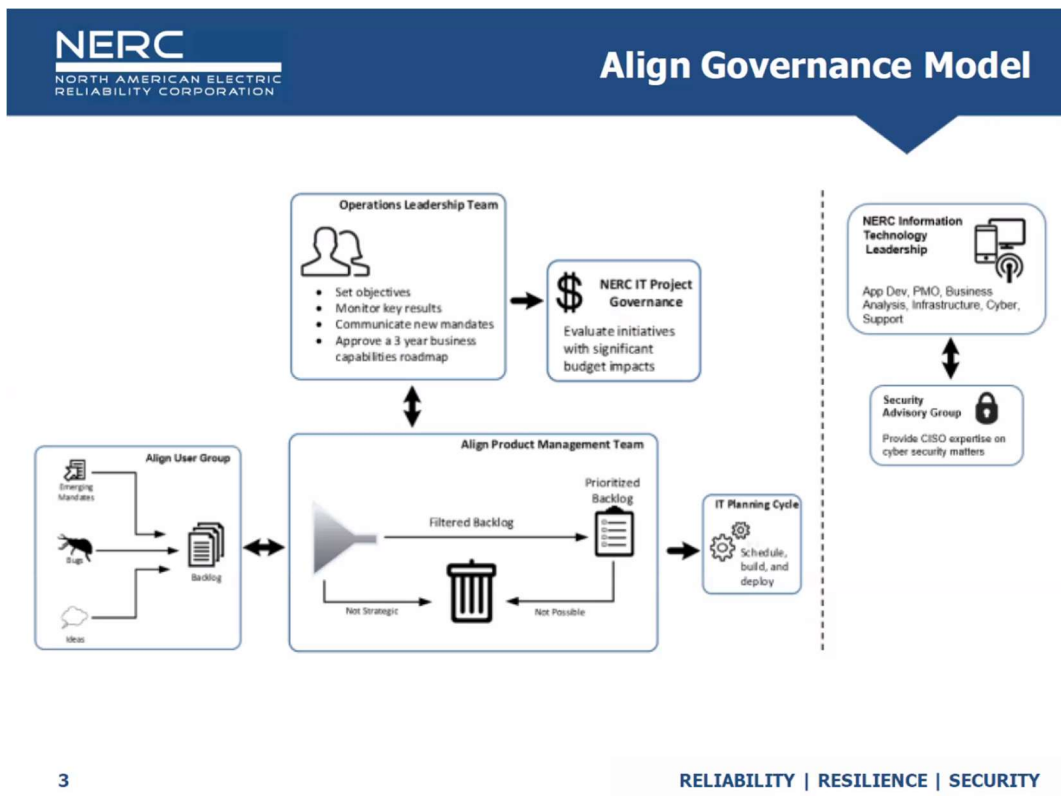
October 11-12, 2023

Hybrid Meeting

APS Offices

Q4 Focused Discussion – Align/Secure Evidence Locker (SEL)

This discussion was a continuation of discussions that were held last year at CCC. Holly Peterson, Justin Lofquist, and Sara Minges led the discussion and provided updated information on Align/SEL. NERC reviewed the Align Governance Model (shown below):





The Align Users Group is made up of representatives from the Industry, who provide feedback to NERC.

NERC noted that it makes information available to the industry through several mechanism. First, they noted that on the NERC website there is a page dedicated to Align/SEL. In addition, NERC also conveys information through the NERC Weekly Bulletin, which includes information like upcoming trainings, outages, and release notes. Information is also sent to the PCC, ACC, and all users of Align. In addition, there is an “Ask Align” email address to which stakeholders are always encouraged to send feedback. However, if there is an immediate problem, do not use this email. Use the hyperlink to open a ticket instead.

NERC noted that the recent/current areas of focus have included: 1) implementation of the Candadian provinces into Align; 2) migration of closed violations into Align; 3) developing and deploying critical enhancements (RFI functionality, audit workpapers (RSAWS), R1 reports for registered entities and CEA); and 4) IRA and COP pilot programs. Of these priorities, NERC indicated that it is working on adding the Canadian entities in WECC. The migration of old violations is complete. Current areas of focus include the pilot programs for IRA and COP.

Discussion with the CCC:

It was noted that lot of the enhancements are still on the list are not finished and it was asked how NERC is prioritizing enhancements and business requirements? NERC explained there are a number of input methods and they all go into one backlog and are prioritized from there. NERC explained that there was a lot of focus this year on getting the Canadian entities integrated and that took priority over some of the other items, but they will be shifting back towards the backlog of feedback. Prioritization is

always the challenge when making decisions, and they recognize the frustrations. They will next be looking at what are the must haves vs. nice to haves.

Further, there was a comment that NERC has a small team working on this and the question was raised as to whether NERC is adequately staffed? NERC is continually looking at resources and recognizes there is a lot on the backlog. It was also noted that there may be some differences between what the ERO thinks is a need versus what the industry thinks as a need.

A question was raised on the Ask Align email and the spreadsheet of enhancements, and whether it is going to be made available. NERC responded that they were not sure what the spreadsheet was that the person referenced. It was then asked if the backlog could be made available. NERC responded that they would take back the idea of publishing some sort of backlog. They noted that it may be difficult because of both the technical and security aspects. This theme continued to be raised. One concern is that NERC may not fully understand the importance of issues from the registered entity side and that something that seems “nice to have” to NERC may actually be very impactful to the registered entity.

A question was then asked if there is there a way for there to be additional visibility into what items are next to being addressed and if there are any that will never be addressed. This would go a long way towards communication. It would also help people understand if something is falling in a particular place on the priority list and maybe there needs to be additional communication about what the priority should be or why it is significant.

It was asked about the ability to export from Align. NERC responded that they think that would be a capability issue with the platform, but can look into it.

It was noted that there were frustrations that have been shared and not addressed. NERC was receptive to this feedback. There were additional comments heard on many of the frustrations that are commonly raised about Align/SEL, including hours of unavailability of the SEL (and whether that actually is a security enhancing feature), the individual fields that have to be populated in Align and the additional time that it takes, and the limitations on file size.

Subcommittee and Task Force Reports

Subcommittee reports were heard from the Nominating Subcommittee, the ORCS, and EROMS. There was a voting item from EROMS on CCCPP-012-2 – Monitoring CCC Participation in NERC's Audits of CMEP Programs, which was approved. Updates were also heard from the CCC Executive Committee and on the Consistency Reporting Tool Task Force. Consistency Reporting has been a focused discussion in past quarters and a Task Force was developed to further consider issues related to reporting and the NERC tool. It was noted that the tool is working as intended, the issue is more related to use.

Residual Risk – CCC Role and Next Steps

This continues to be an area of focus for the ERO and the CCC continued its discussion from the last meeting on its role and next steps. The CCC discussed the meaning of residual risk, noting that residual

risk is really just what is left after risk reducing factors are considered. Concerns were raised that a certain risk was assigned when the standard was approved and this feels like this could deviate.

A noteworthy part of the discussion centered around the important distinction between accepting noncompliance and accepting risk, and the need to clarify that accepting residual risk is not an indication of accepting noncompliance. Compliance is always required. The point was made that there should be a separation between compliance and additional risk.

The discussion of this issue continues to raise many uncertainties. There were a number of questions raised on how the residual risk is measured, and the concern as to how can we be successful if we don't know what we are measuring. There were also concerns that focusing on the residual risk does not focus on the big risks that you have when you focus on inherent risk.

The consensus of the CCC was that it was not ready to take action at this point.

Additional Updates

Brief updates were received on the NERC Standing Committee Coordination Group (SCCG), the NERC Board of Trustees (Board) and Members Representatives Committee (MRC); Enterprise-wide Risk Committee (EWRC); and the Reliability Issues Steering Committee (RISC).

The next CCC meeting is scheduled for January 23-25, 2024 and is virtual. Additional 2024 meetings are scheduled for April 30 – May 2, 2024 (Little Rock, AR – SPP); July 23 – 25, 2024 (Folsom, CA – CAISO) and October 15 – 17, 2024 (Atlanta, GA – NERC Offices).