



MIDWEST  
RELIABILITY  
ORGANIZATION

# Meeting Agenda

## Compliance Monitoring Enforcement Program Advisory Council (CMEPAC)

February 21, 2023  
9:00 am to 3:00 p.m. central

*Via Webex*

## **VIDEO AND AUDIO RECORDING**

Please note that Midwest Reliability Organization (MRO) may make a video and/or an audio recording of this organizational group meeting for the purposes of making this information available to board members, members, stakeholders and the general public who are unable to attend the meeting in person.

By attending this meeting, I grant MRO:

1. Permission to video and/or audio record the meeting including me; and
2. The right to edit, use, and publish the video and/or audio recording.
3. I understand that neither I nor my employer has any right to be compensated in connection with the video and/or audio recording or the granting of this consent.

## **MRO ORGANIZATIONAL GROUP GUIDING PRINCIPLES**

These MRO Organizational Group Guiding Principles complement charters. When the Principles are employed by members, they will support the overall purpose of the organizational groups.

**Organizational Group Members should:**

- 1. Make every attempt to attend all meetings in person or via webinar.**
- 2. Be responsive to requests, action items, and deadlines.**
- 3. Be active and involved in all organizational group meetings by reviewing all pre-meeting materials and being focused and engaged during the meeting.**
- 4. Be self-motivating, focusing on outcomes during meetings and implementing work plans to benefit MRO and MRO's registered entities.**
- 5. Ensure that the organizational group supports MRO strategic initiatives in current and planned tasks.**
- 6. Be supportive of Highly Effective Reliability Organization (HERO®) principles.**
- 7. Be supportive of proactive initiatives that improve effectiveness and efficiency for MRO and MRO's registered entities.**

## **AGENDA 1**

### **Call to Order and Determination of Quorum**

#### **a. Standards of Conduct and Anti-Trust Guidelines**

*Speaker*

#### **Standards of Conduct Reminder:**

Standards of Conduct prohibit MRO staff, committee, subcommittee, and task force members from sharing non-public transmission sensitive information with anyone who is either an affiliate merchant or could be a conduit of information to an affiliate merchant.

#### **Anti-trust Reminder:**

Participants in Midwest Reliability Organization meeting activities must refrain from the following when acting in their capacity as participants in Midwest Reliability Organization activities (i.e. meetings, conference calls, and informal discussions):

- Discussions involving pricing information; and
- Discussions of a participants marketing strategies; and
- Discussions regarding how customers and geographical areas are to be divided among competitors; and
- Discussions concerning the exclusion of competitors from markets; and
- Discussions concerning boycotting or group refusals to deal with competitors, vendors, or suppliers.

## **CMEPAC Q1 2023 MEETING AGENDA**

### **Agenda Item**

- 1 Call to Order and Determination of Quorum**  
*Terri Pyle, CMEP Advisory Council Chair*
  - a. Determination of Quorum  
*Michelle Olson, Compliance Monitoring Administrator and CMEP Advisory Council Secretary*
  - b. Robert's Rules of Order
- 2 Standards of Conduct and Antitrust Guidelines**  
*CMEP Advisory Council Chair*
- 3 Welcome New CMEPAC Members**  
*CMEP Advisory Council Chair*
- 4 Advisory Council Logistics**  
*Michelle Olson, Compliance Monitoring Administrator and CMEP Advisory Council Secretary*
- 5 Consent Agenda**  
*Terri Pyle, CMEP Advisory Council Chair*
  - a. Q2 2022 Open Minutes
- 6 Quarterly Self-Certification Schedule Worksheet Review**  
*Terri Pyle, CMEP Advisory Council Chair*
- 7 CMEP Quarterly Discussion**
  - a. Requirement Specific RFIs  
*Bill Steiner, MRO Director of Risk Assessment & Mitigation*
  - b. Compliance Oversight Plan FAQ  
*Jeff Norman, MRO Director of Compliance Monitoring*
  - c. CMEP Quarterly Report Schedule  
*Tasha Ward, MRO Director of Enforcement and External Affairs*

### **Break – 10:00 a.m.**

- 8 Standing Reports**
  - a. NERC Compliance and Certification Committee (NERC CCC)  
*Erin Cullum Marcussen, NERC CCC Representative*
  - b. NERC Standards Committee (NERC SC)  
*Troy Brumfield, NERC SC Representative*
  - c. NERC RS&T Committee (NERC RSTC)  
*Jeff Norman, MRO Compliance Monitoring Director and CMEP Advisory Council Liaison*
  - d. NERC Standards Review Forum (NSRF)  
*George Brown, NSRF Chair*
  - e. Facilities Ratings Task Force (FRTF)  
*Jon Radloff, FRTF Representative*
  - f. NERC SupplyChain Task Force (SCTF)  
*Mark Zellner, SCTF Representative*
  - g. SPP Reliability Compliance Advisory Group (RCAG)  
*Mark Buchholz, CMEPAC and RCAG Member*
  - h. Mid-Continent Compliance Forum (MCCF)  
*Mark Buchholz, CMEPAC and MCCF Member*

## MEETING AGENDA – Compliance Monitoring Enforcement Program Advisory Council (CMEPAC) – February 21, 2023

### 9 Subteam Updates

*CMEP Advisory Council Chair*

- a. Conference Subteam  
*Tiffany Lake, CMEPAC Vice Chair*
- b. Newsletter Subteam  
*Mark Buchholz, CMEPAC Member*
- c. Monthly Call Subteam  
*Carl Stelly, CMEPAC Member*
- d. Webinar Subteam  
*Terri Pyle, CMEPAC Chair*
- e. Assignments

### 10 Ask CMEPAC

*Terri Pyle, CMEP Advisory Council Chair*

### Lunch 12:00 p.m.

### 11 OGOC Feedback

*Tiffany Lake, CMEP Advisory Council Vice Chair*

### 12 Work Plan Updates

*Terri Pyle, CMEP Advisory Council Chair*

- a. Vote to recommend the 2023 CMEPAC Workplan to the OGOC for approval
- b. Finalize 2023 Workplan

### 13 Action Item Review

*Michelle Olson, Compliance Monitoring Administrator and CMEP Advisory Council Secretary*

### 14 Other Business and Adjourn

*Terri Pyle, CMEP Advisory Council Chair*

## Call to Order and Determination of Quorum

b. Robert's Rules of Order  
Terri Pyle, CMEPAC Chair

**Parliamentary Procedures.** Based on Robert's Rules of Order, Newly Revised, Tenth Edition

**Establishing a Quorum.** In order to make efficient use of time at MRO organizational group meetings, once a quorum is established, the meeting will continue, however, no votes will be taken unless a quorum is present at the time any vote is taken.

**Motions.** Unless noted otherwise, all procedures require a "second" to enable discussion.

When you want to...	Procedure	Debatable	Comments
Raise an issue for discussion	Move	Yes	The main action that begins a debate.
Revise a Motion currently under discussion	Amend	Yes	Takes precedence over discussion of main motion. Motions to amend an amendment are allowed, but not any further. The amendment must be germane to the main motion, and cannot reverse the intent of the main motion.
Reconsider a Motion already resolved	Reconsider	Yes	Allowed only by member who voted on the prevailing side of the original motion. Second by anyone.
End debate	Call for the Question or End Debate	No	If the Chair senses that the committee is ready to vote, he may say "if there are no objections, we will now vote on the Motion." Otherwise, this motion is not debatable and subject to majority approval.
Record each member's vote on a Motion	Request a Roll Call Vote	No	Takes precedence over main motion. No debate allowed, but the members must approve by majority.
Postpone discussion until later in the meeting	Lay on the Table	Yes	Takes precedence over main motion. Used only to postpone discussion until later in the meeting.
Postpone discussion until a future date	Postpone until	Yes	Takes precedence over main motion. Debatable only regarding the date (and time) at which to bring the Motion back for further discussion.

Remove the motion for any further consideration	Postpone indefinitely	Yes	Takes precedence over main motion. Debate can extend to the discussion of the main motion. If approved, it effectively “kills” the motion. Useful for disposing of a badly chosen motion that cannot be adopted or rejected without undesirable consequences.
Request a review of procedure	Point of order	No	Second not required. The Chair or secretary shall review the parliamentary procedure used during the discussion of the Motion.

### Notes on Motions

**Seconds.** A Motion must have a second to ensure that at least two members wish to discuss the issue. The “seconder” is not required to be recorded in the minutes. Neither are motions that do not receive a second.

**Announcement by the Chair.** The chair should announce the Motion before debate begins. This ensures that the wording is understood by the membership. Once the Motion is announced and seconded, the Committee “owns” the motion, and must deal with it according to parliamentary procedure.

### Voting

Voting Method	When Used	How Recorded in Minutes
	When the Chair senses that the Committee is substantially in agreement, and the Motion needed little or no debate. No actual vote is taken.	The minutes show “by unanimous consent.”
Vote by Voice	The standard practice.	The minutes show Approved or Not Approved (or Failed).
Vote by Show of Hands (tally)	To record the number of votes on each side when an issue has engendered substantial debate or appears to be divisive. Also used when a Voice Vote is inconclusive. (The Chair should ask for a Vote by Show of Hands when requested by a member).	The minutes show both vote totals, and then Approved or Not Approved (or Failed).



## Meeting Agenda – CMEP Advisory Council – 2/21/2023

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Vote by Roll Call	To record each member's vote. Each member is called upon by the Secretary, and the member indicates either  "Yes," "No," or "Present" if abstaining.	The minutes will include the list of members, how each voted or abstained, and the vote totals. Those members for which a "Yes," "No," or "Present" is not shown are considered absent for the vote.
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### Notes on Voting.

**Abstentions.** When a member abstains, he/she is not voting on the Motion, and his/her abstention is not counted in determining the results of the vote. The Chair should not ask for a tally of those who abstained.

**Determining the results.** A simple majority of the votes cast is required to approve an organizational group recommendations or decision.

**"Unanimous Approval."** Can only be determined by a Roll Call vote because the other methods do not determine whether every member attending the meeting was actually present when the vote was taken, or whether there were abstentions.

**Electronic Votes** – For an e-mail vote to pass, the requirement is a simple majority of the votes cast during the time-period of the vote as established by the Committee Chair.

**Majorities.** Per Robert's Rules, as well as MRO Policy and Procedure 3, a simple majority (one more than half) is required to pass motions.

## Standards of Conduct and Anti-Trust Guidelines

*Terri Pyle, CMEPAC Chair*

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**Welcome New CMEPAC Members**

*Terri Pyle, CMEPAC Chair*

**Action**

Welcome the new CMEPAC members

**Report**

**Advisory Council Logistics**

*Michelle Olson, Compliance Monitoring Administrator and CMEP Advisory Council Secretary*

**Action**

Presentation

**Report**

Michelle Olson will present this information during the meeting

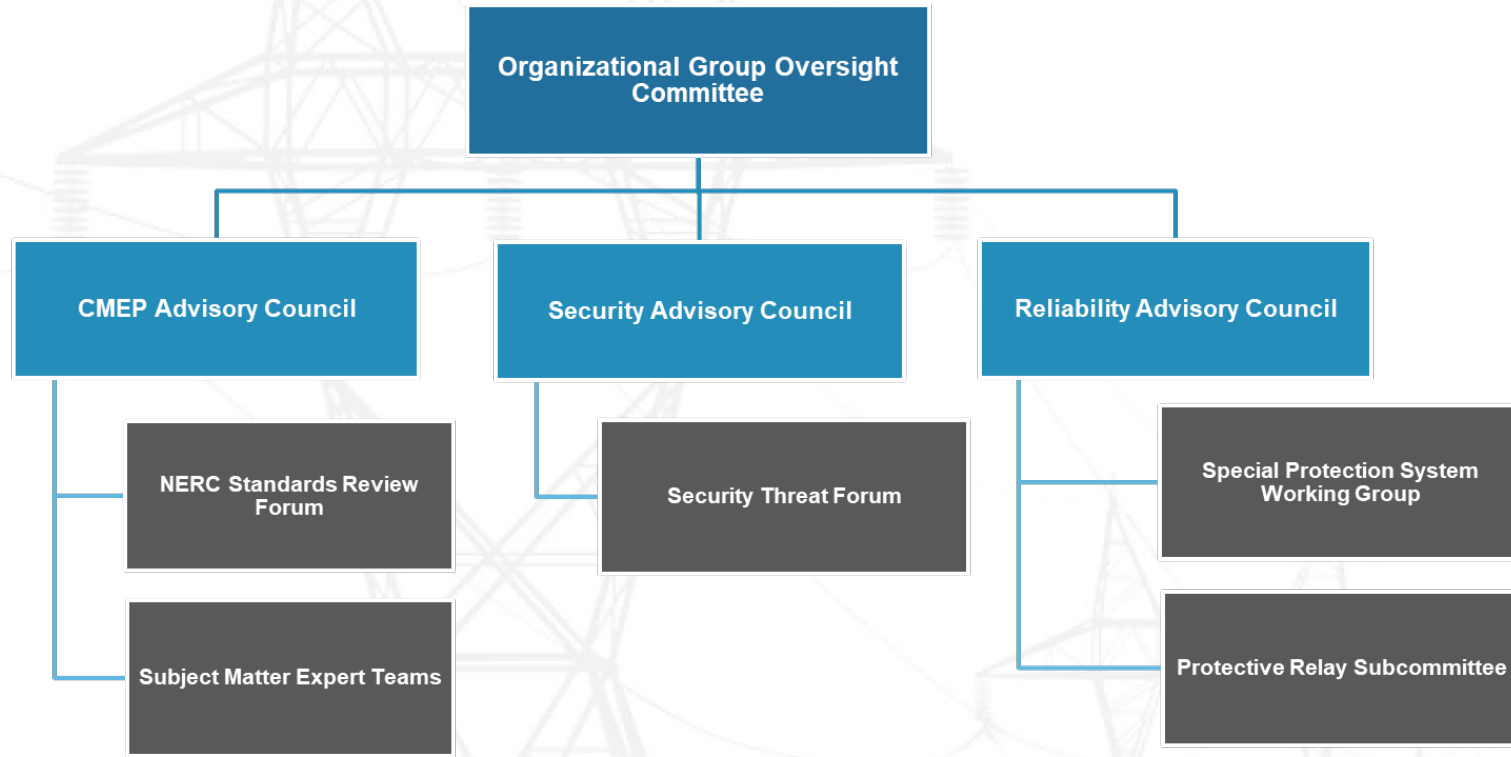


MIDWEST  
RELIABILITY  
ORGANIZATION

# Midwest Reliability Organization

Information for Members of the  
MRO CMEP Advisory Council

# Organizational Group Structure



# Organizational Group Oversight Committee

- **OGOC:**

- Establishes and oversees MRO organizational groups and policies applicable to organizational groups
- Ensures organizational groups are effective and efficient and do not duplicate the work of others
- Designates individuals to represent MRO on NERC organizational groups
- The Organizational Group Oversight Committee Charter is posted on [MRO's public website](#)



# OGOC Roster

NAME	SECTOR	OGOC TERM END
JoAnn Thompson, Chair	Investor Owned Utility	12/31/2023
Daryl Maxwell, Vice Chair	Canadian Utility	12/31/2023
Ben Porath	Cooperative	12/31/2024
Charles Marshall	Transmission System Operator	12/31/2023
Darcy Neigum	Investor Owned Utility	12/31/2023
Dehn Stevens	Investor Owned Utility	12/31/2023
Eric Schmitt	Independent Director	12/31/2024
Iqbal Dhani	Canadian Utility	12/31/2024
Jeanne Tisinger	Independent Director	12/31/2024
Keri Glitch	Transmission System Operator	12/31/2024
Maurice Moss	Municipal Utility	12/31/2023





# Guiding Principles for Council Members

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# Nomination Process

- **MRO will solicit for nominations**
- **Fill out nomination form or nominate an individual**
- **Information will be sent to council members for review**
- **Councils will recommend nominees to OGOC**
- **Subgroups will recommend nominees to councils and the councils will recommend to OGOC**

# Why Diverse Teams are Smarter

- **They focus more on facts**
  - More likely to constantly reexamine facts and remain objective
  - Can lead to improved and more accurate group thinking
- **They process those facts more carefully**
  - Considering the perspective of an outsider can result in improved decision-making and results
- **They are also more innovative**
  - Diversity boosts intellectual potential
  - Conformity discourages innovative thinking

SOURCE: <https://hbr.org/2016/11/why-diverse-teams-are-smarter>



# Types of Diversity

## Inherent Diversity

- Race
- Ethnicity
- Age
- National origin
- Sexual orientation
- Cultural identity
- Assigned sex
- Gender identity

## Acquired Diversity

- Expertise (e.g., engineering, operations, security)
- Experience (e.g., executive, technical)
- Geography (e.g., US, Canada, north, south)
- Company (e.g., no more than two members from the same company per group)



# MRO Council Support Staff

- **Technical Liaison**

- Jeff Norman, Director of Compliance Monitoring
- Work: 651-855-1703
- Cell: 612-501-3871
- [jeff.norman@mro.net](mailto:jeff.norman@mro.net)

- **Technical Support Staff**

- Michelle Olson, Compliance Monitoring Administrator
- Work: 651-855-1709
- [michelle.olson@mro.net](mailto:michelle.olson@mro.net)



# Mailing Lists

- **Council mailing list:**
  - [mrocmepac@mro.net](mailto:mrocmepac@mro.net)
  - [mrocmepac-plus@mro.net](mailto:mrocmepac-plus@mro.net)
  - [askcmepac@mro.net](mailto:askcmepac@mro.net)
- **Please make sure to whitelist these email addresses**

# Important Information for Meetings

- **Virtual:**

- Accept calendar invites

- **In-Person:**

- Register for meetings
- Accept calendar invites
- Please see the lodging and travel information section of the events which will helpful information for each meeting and event



# Important Information for Meetings

- **Meeting Agendas:**

- Short agenda posted one month prior to meeting
- Agenda Packet posted one week prior to meeting

- **Meeting Minutes:**

- Support Staff/Liaison will review up to two weeks after meeting takes place
- Council will review for one week
- Council will vote to approve
  - Votes will need to be one more than half





# Work Plan

- Available on CMEPAC Collaboration Site
- OGOC Approved Work Plan posted on MRO's website
- Items above blue line approved by OGOC
- Items below blue line are how CMEPAC will accomplish above blue line items
- Action items tracked on separate worksheet in Work Plan workbook

# Newsletters

- Bio, photo, employment title and article
- Need submitted to Technical Support Staff 1 week prior to the requested publication date

SECURITY CORNER



## 2020 Virtual Regional Security Risk Assessment

MRO's 2020 Security Conference was followed by the Regional Security Risk Assessment, which was held virtually for the first time. This meeting was attended by MRO SAC Members and regional security partners to discuss security risks within the region. This year's assessment incorporated a series of pre-assessment surveys targeted at operational, physical, and cyber security subject matter experts from across the region.

The meeting began with an update from the E-ISAC on risks to registered entities. Meeting participants then broke out into small group sessions based on entity size to discuss cyber security, physical security, and operational security risks that were identified from the preassessment surveys as most prominent risks within the MRO footprint.

The risk findings from this meeting were used as input to the MRO Regional Risk Assessment and by the MRO SAC to identify topics for future outreach and training deliverables.

To participate in next year's assessment, please reach out to MRO Director of Security Steen Fjalstad at [steen.fjalstad@mro.net](mailto:steen.fjalstad@mro.net).

- Joe Petaski, Manitoba Hydro, MRO SAC Member



CLARITY

ASSURANCE

RESULTS

# Webinars

- **Complete webinar request e-mail (on CMEPAC Collaboration Site)**

- Topic
- Title
- Short paragraph describing event
- Dates/Times for Dry-run and Webinar
- Presenters/Speaker Information
  - Title
  - Company
  - Best contact number
  - Email
- Council Support Member
- MRO Support Staff
- Presentation

<b>Webinar Topic:</b>		
<b>Executive Summary:</b>	<i>Paragraph (at least 3-5 sentences) with a description of who and what this webinar</i>	
<b>Webinar Title:</b>		
<b>Webinar Date/Time:</b> *Date should be at least 6 weeks out for planning unless already agreed upon with MRO Staff	<b>Date (Tues, Wed, Thurs):</b>	<b>Time: (Central/Eastern, etc)</b>
		<b>Length: (30/60/90?)</b>
<b>Dry-Run Webinar Date/Time:</b>	<b>Date (Tues, Wed, Thurs):</b>	
	<b>Time:</b>	
		<b>Length: (30/60/90?)</b>
<b>Can Live Video be Posted to MRO Public Site?</b>	<i>Yes/ No or Yes, but put behind a password</i>	
<b>Webinar Team:</b>	<b>Speaker(s)</b> <ul style="list-style-type: none"> <li>• 1. Name of Speaker               <ul style="list-style-type: none"> <li>a. Company:</li> <li>b. Job Title:</li> <li>c. Email Address:</li> <li>d. Phone Number:</li> </ul> </li> <li>• 2. Name of Speaker               <ul style="list-style-type: none"> <li>a. Company:</li> <li>b. Job Title:</li> <li>c. Email Address:</li> <li>d. Phone Number:</li> </ul> </li> </ul>	
	<i>Moderator (MRO CMEPAC Member/CMEPAC Liaison/CMEPAC Staff S</i>	



# MRO CMEP Advisory Council

- The MRO Compliance Monitoring and Enforcement Program Advisory Council (MRO CMEP Advisory Council) is a MRO Organizational Group that provides advice and counsel to MRO's Board of Directors (board), the board's Organizational Group Oversight Committee, staff, members and registered entities on topics such as the development, retirement, and application of NERC Reliability Standards, risk assessment, compliance monitoring, and the enforcement of applicable standards. The MRO CMEP Advisory Council increases outreach and awareness in these key areas.
- <https://www.mro.net/organizational-groups/cmep-advisory-council/>



# MRO CMEP Advisory Council

## Council Membership

- **MRO's Council consists of 15 members:**
  - Pursuant to [Policy and Procedure 3](#) - Establishment, Responsibilities, and Procedures of Organizational Groups and MRO Sponsored Representative on NERC Organizational Groups, membership on councils is based on experience and expertise.
  - No more than two members of the MRO (Council) may be an employee of a single entity or affiliated entities.
  - At least three sectors will be represented on the MRO (Council). To the extent practicable, membership will reflect geographic diversity and balanced sector representation.
  - Individuals with expertise and experience in the areas of power systems operations or planning, physical security or cybersecurity, NERC Reliability Standards processes, and/or implementation of compliance programs serve on the MRO CMEPAC.



# MRO CMEPAC

## 2023 Roster

NAME	ROLE	COMPANY	TERM END
Terri Pyle	Chair	Oklahoma Gas and Electric	12/31/2023
Tiffany Lake	Vice Chair	Evergy, Inc.	12/31/2023
Alison Archer	Member	MISO	12/31/2025
Ashley Stringer	Member	Oklahoma Gas and Electric	12/31/2023
Bryan Dixon	Member	Xcel Energy	12/31/2024
Carl Stelly	Member	Southwest Power Pool, Inc.	12/31/2024
Eric Ruskamp	Member	Lincoln Electric System	12/31/2023
Kevin Lyons	Member	Central Iowa Power Cooperative	12/31/2024
Larry Heckert	Member	Alliant Energy	12/31/2024
Mahmood Safi	Member	Omaha Public Power District	12/31/2025
Mark Buchholz	Member	Western Area Power Administration	12/31/2025
Matt Caves	Member	Western Farmers Electric Cooperative	12/31/2025
Nazra Gladu	Member	Manitoba Hydro	12/31/2024
Theresa Allard	Member	Minnesota Power Cooperative	12/31/2023
Troy Brumfield	Member	American Transmission Company	12/31/2025



# MRO CMEPAC

## Key Responsibilities

- Annually develop a work plan to support the MRO Strategic Plan and Metrics for approval by the OGOC.
- Serve as subject matter experts for MRO registered entities, members, other organizational groups, staff, as well as the board and its committees. This responsibility includes acting as the stakeholder peer group during a facts and circumstances conference with a registered entity related to contested violation(s), penalty, or Mitigation Plan(s), consistent with NERC Rules of Procedure and the CMEP.
- Maintain awareness of work by industry, NERC, and other Regional Entity organizational groups to avoid or minimize duplicative efforts, and to partner and coordinate where appropriate.
- Propose new, modifications to, or the retirement of, regional or continent-wide Reliability Standards based on risk.
- Maintain the Midwest Reliability Organization Regional Reliability Standards Process Manual, and serve the roles noted for the Compliance and Standards Committees in the manual.
- Review and provide comments on the MRO Annual CMEP Implementation Plan as presented by MRO staff.
- Provide non-binding MRO Standard Application Guides (SAGs) to assist stakeholders in understanding NERC Reliability Standards and approaches to meet requirements.
- Develop a Highly Effective Reliability Organization (HERO) outreach effort to help registered entities assess and improve their own reliability and compliance practices, as well as distill and communicate lessons learned from issues of non-compliance.





# Meetings

- The MRO CMEPAC will meet quarterly or as necessary, in person or via conference call and/or web meeting.
- All MRO council chairs and vice chairs will meet with the OGOC the day before the fourth quarter regularly scheduled board meeting to review the council's accomplishments during the past year and to develop work plans for the following year
- Meetings of the MRO CMEPAC are open to public attendance; however, the meeting may be called into closed session by the chair or vice chair. Additional meeting requirements related to agendas and minutes, voting and proxy, and rules of conduct are outlined in MRO Policy and Procedure 3 - Establishment, Responsibilities, and Procedures of Organizational Groups and MRO Representation on NERC Organizational Groups
- Meeting costs incurred by MRO CMEPAC members are reimbursable by MRO according to [MRO Policy and Procedure 2 – Expense Reimbursement](#)





# Future Meeting/Event Dates

- Upcoming CMEPAC Meeting/Event Dates

Meeting/Event	Date
Quarter 1	February 21, 2023
Quarter 2	May 31, 2023
Quarter 3	August 9, 2023
Quarter 4	October 19, 2023
CMEP Conference	July 26, 2023

# Self-Certification Worksheet Reviews

- **Quarterly review self-certification worksheets**
  - Worksheets will be loaded to collaboration site
  - Given specific time for review
  - Provide proposed changes/comments in worksheet with track changes turned on



# MRO CMEPAC Subgroups

- NERC Standards Review Forum
  - <https://www.mro.net/organizational-groups/cmep-advisory-council/nsrf/>
  - Virtual meetings every Wednesday
  - Meetings open to the public
- Subject Matter Expert Teams
  - Utilized to draft Standard Application Guides, when requested
  - No current active Subject Matter Expert Teams



# Important links

- Council SharePoint: <https://midwestreliabilityorg.sharepoint.com/SitePages/Home.aspx>
- Monthly Call Registration: <https://www.surveymonkey.com/r/MROCMEPACMONTHLYCALLREGISTRATION>
- MRO CMEPAC Public Site: <https://www.mro.net/organizational-groups/cmep-advisory-council/>
- MRO NSRF Public Site: <https://www.mro.net/organizational-groups/cmep-advisory-council/nsrf/>
- Expense Reimbursement: [MRO Policy and Procedure 2 – Expense Reimbursement](#)
- Member Responsibilities: [MRO Policy and Procedure 3- Establishment, Responsibilities](#)
- Confidentiality Policy: [MRO Policy and Procedure 5 \(Confidentiality Policy\)](#), then sign and return the annual Statement of Confidentiality
- Council mailing list:
  - Council: [mrocmepac@mro.net](mailto:mrocmepac@mro.net)
  - Extended Council mailing list: [mrocmepac-plus@mro.net](mailto:mrocmepac-plus@mro.net)
  - Subgroup: [mronsrf@mro.net](mailto:mronsrf@mro.net)



# General MRO Contact Information

- **Website**

- <http://www.mro.net>

- **Contact**

Address: 380 St. Peter Street, Suite 800, Saint Paul, MN 55102

Phone: (651) 855-1760

Fax: (651) 855-1712



**Consent Agenda**

- a. Q2 2022 Open Minutes  
*Terri Pyle, CMEP Advisory Council Chair*

**Action**

Vote

**Report**

The Q2 2022 Open CMEP Advisory Council minutes will begin on the next page.



# MIDWEST RELIABILITY ORGANIZATION

## MRO CMEPAC Q2 Meeting

June 07, 2022

9:00 AM to 2:27 PM Central

### Minutes of the Compliance Monitoring Enforcement Program Advisory Council (CMEPAC) Meeting

**OPEN**

**Webex**

June 07, 2022 9:00 AM

Notice for this meeting was electronically posted to the MRO website [here](#) on May 10, 2022. A final agenda, including advanced reading materials, was also posted on May 30, 2022.

#### Agenda Item

##### **1 Call to Order and Determination of Quorum**

*Terri Pyle, CMEP Advisory Council Chair*

- a. Determination of Quorum  
*Michelle Olson, CMEPAC Meeting Secretary*
- b. Robert's Rules of Order

Compliance Monitoring and Enforcement Program Advisory Council (CMEPAC) Chair Terri Pyle called the meeting to order at 9:00 a.m. Central. CMEP Advisory Council Staff Support and Compliance Monitoring Administrator Michelle Olson advised the chair that a quorum of the CMEPAC was present. A complete list of attendees is included as Exhibit A.

##### **2 Standards of Conduct and Antitrust Guidelines**

*Terri Pyle, CMEP Advisory Council Chair*

Pursuant to Policy and Procedure 4, Chair Pyle highlighted MRO's Standards of Conduct, Conflict of Interest, and Antitrust Guidelines. Carl Stelly called members' attention to the Robert's Rules of Order summary included in the agenda packet.

##### **3 New CMEP Advisory Council Welcome**

*Terri Pyle, CMEP Advisory Council Chair*

Pyle and the CMEPAC members welcomed the new members.

#### 4 Self-Certification Insight Survey

*Jeff Norman, MRO Director of Compliance Monitoring and Staff Liaison*

Jeff Norman, MRO Director of Compliance Monitoring and Staff Liaison, presented an opportunity for feedback to the CMEPAC regarding how MRO administers Self-Certifications from an entity's perspective. The MRO compliance department will use this information to improve their self-certification process.

#### 5 MRO Regional Risk Assessment CMEPAC Volunteers

*Terri Pyle, CMEP Advisory Council Chair*

##### a. MRO Regional Risk Assessment Volunteering Q&A

*Lee Felter, MRO Principal Risk Assessment & Mitigation Engineer*

Lee Felter provided a high level overview of the Regional Risk Assessment (RRA), what volunteering entails, and the value of the insight MRO gains from the volunteers. Pyle and Tiffany Lake also contributed to this discussion as the RRA volunteers from last year. Discussion ensued.

##### b. MRO Regional Risk Assessment CMEPAC Volunteer Solicitations

*Jeff Norman, MRO Director of Compliance Monitoring and Staff Liaison*

After the Q&A session, Jeff Norman solicited for two volunteers for the RRA. Three individuals offered to volunteer and a vote occurred offline to select two RRA volunteers.

This report was provided in the meeting materials. Discussion ensued.

#### 6 CMEPAC Subteam Updates

##### a. Monthly Call

*Carl Stelly, CMEPAC Member*

Carl Stelly provided an overview of the monthly call logistics. Norman provided an update that the OGOC had approved the proposal to make the CMEP Monthly Calls public. This included that the call agendas will be posted prior to each call.

##### b. Newsletter

*Mark Buchholz, CMEPAC Member*

Mark Buchholz provided an update on the recent and upcoming newsletters.

##### c. Webinar

*Terri Pyle, CMEPAC Chair*

Pyle provided an update on the recent and upcoming webinars and solicited topics from the CMEPAC members and guests for future topics. Discussion ensued and topics were requested to be send via email.

##### d. Conference

*Tiffany Lake, CMEPAC Vice Chair*



Lake provided an update on the CMEP conference progress and presented the proposed agenda for review and feedback. Discussion ensued. No changes were made to the agenda.

## 7 CIP-012 Pilot program Report Review

*Jess Syring, MRO Compliance Monitoring Manager, CIP*

Jess Syring was unable to attend this meeting. Jeff Norman presented on the CIP-012 pilot program report to be presented to the OGOC and opened up the floor for review and feedback.

## 8 Standing Reports

- a. NERC Compliance and Certification Committee (NERC CCC)

*Erin Cullum Marcussen, NERC CCC Member*

This report was provided in the meeting materials. Discussion ensued.

- b. Standards Committee (SC)

*Troy Brumfield, NERC SC Member*

This report was provided in the meeting materials. Discussion ensued.

- c. NERC Standards Review Forum (NSRF)

*George Brown, NSRF Chair*

This report was provided in the meeting materials. Discussion ensued.

- d. MidContinent Compliance Forum (MCCF)

*Mark Buchholz, CMEPAC and MCCF Member*

This report was provided in the meeting materials. Discussion ensued.

- e. SPP Reliability Compliance Advisory Group (RCAG)

*Mark Buchholz, CMEPAC and RCAG Member*

This report was provided in the meeting materials. Discussion ensued.

**Break – 9:30 a.m.**

## 9 Annual Charter Review

*Terri Pyle, CMEP Advisory Council Chair*

- a. CMEPAC

The CMEPAC reviewed the redlined charter. After a motion duly made and seconded, Pyle opened the floor for discussion. Discussion ensued.

*Upon a motion duly made and seconded, the CMEPAC approved the updates to the CMEPAC charter as presented to recommend to the OGOC for approval.*

- b. NSRF

The CMEPAC reviewed the NSRF charter. After a motion duly made and seconded, Pyle opened the floor for discussion. Discussion ensued.

*Upon a motion duly made and seconded, the CMEPAC approved the updates to the NSRF charter as presented to recommend to the OGOC for approval.*

## **10 Work Plan Updates**

*Terri Pyle, CMEP Advisory Council Chair*

Due to time constraints, this agenda item was postponed. Pyle and Norman met offline to discuss the details of the work plan.

## **11 Q3 Joint OGOC Discussion**

*Terri Pyle, CMEP Advisory Council Chair*

The CMEPAC discussed topics to bring for the joint discussion with the OGOC in Q3. A few members expressed some concern of the value of these types of meetings. The concerns included the restriction of the meeting date, which includes the lack of the option to reschedule, and that the members are unable to attend the open OGOC meeting since the CMEPAC meeting is occurring simultaneously. Norman added that the directors are also discussing these concerns and will propose a change to the OGOC. This proposal will include that the OGOC and the advisory councils will no longer have joint meetings and that each advisory council will select a representative to speak at the OGOC meeting. Discussion ensued.

## **12 CMEPAC Monthly Call**

*Terri Pyle, CMEP Advisory Council Chair or Carl Stelly, CMEPAC Member*

This agenda item was discussed as part of the Monthly Call subteam report.

## **13 Compliance Severity Index Review**

*Jeff Norman, MRO Director of Compliance Monitoring and Staff Liaison*

Norman presented on the Compliance Severity Index (CSI). He provided a high level overview of what the CSI is its relationship with the RRA. Norman explained that the presentation was intended to provide the CMEPAC insight regarding the standards and requirements for which to create Standard Application Guides (SAGs). Discussion ensued. The slides for this presentation is in the agenda packet.

**Lunch 12:45 p.m.**

## **14 Advisory Council New Member Process Discussion**

*Julie Peterson, MRO Assistant Corporate Secretary and Senior Counsel*

Julie Peterson provided a high level summary of the new member nomination process and where to find the nomination links.

## **15 CMEP Quarterly Discussion**

*Bill Steiner, MRO Director of Risk Assessment & Mitigation*

*Jeff Norman, MRO Director of Compliance Monitoring*

*Tasha Ward, MRO Director of Enforcement and External Affairs*

The CMEP directors, Norman, Bill Steiner, Director of Risk Assessment and Mitigation, and Tasha Ward, Director of Enforcement and External Affairs, provided an overview of the most recent public CMEP update and opened the floor for questions. Discussion ensued. A decision was made that Olson will include this report at part of the future agenda packets for the CMEPAC to review prior to the meeting. This report can be found on MRO's public site.

## 16 Ask CMEPAC

*Terri Pyle, CMEP Advisory Council Chair*

Pyle provided an overview and background of the purpose of the AskCMEPAC email and reminded members and guests of the address and process.

## 17 Action Item Review

*Michelle Olson, CMEPAC Meeting Secretary*

Olson reviewed the action items captured during the meeting. These action items are compiled in a separate tab in the work plan for the CMEPAC members to review.

## 18 Other Business and Adjourn

*Terri Pyle, CMEP Advisory Council Chair*

Having no further business to discuss, the meeting adjourned at 2:27 p.m. Central.

**Prepared by:** Michelle Olson, Council Secretary

**Reviewed and Submitted by:** Jeff Norman, Director of Compliance, CMEPAC Liaison

### Exhibit A – Meeting Attendees

CMEP Advisory Council Members	
Name	Organization
Tiffany Lake	Evergy, Inc.
Carl Stelly	Southwest Power Pool, Inc.
Matt Caves	Western Farmers Electric Cooperative
Terri Pyle	Oklahoma Gas and Electric
Theresa Allard	Minnkota Power Cooperative
Larry Heckert	Alliant Energy
Eric Ruskamp	Lincoln Electric System
Mahmood Safi	Omaha Public Power District
Trevor Stiles	American Transmission Company
Mark Buchholz	Western Area Power Administration

Kevin Lyons	Central Iowa Power Cooperative
Paul Mehlhaff	Sunflower Electric Power Cooperative
Bryan Dixon	Xcel Energy
Fred Meyer	Algonquin Power & Utilities Corp
Troy Brumfield	American Transmission Company
<b>MRO Staff</b>	
<b>Name</b>	<b>Title</b>
Kendra Buesgens	Risk Assessment and Mitigation Administrator
Jeff Norman	Director of Compliance Monitoring
Michelle Olson	Compliance Monitoring Administrator
William Steiner	Director of Risk Assessment and Mitigation
Cris Zimmerman	Manager of Outreach and Stakeholder Engagement
Ryan McNamara	CIP Risk Assessment and Mitigation Engineer
Lee Felter	Principal Risk Assessment & Mitigation Engineer, CIP
Steen Fjalstad	Director of Security
Jess Syring	Compliance Monitoring Manager, CIP
Tasha Ward	Director of Enforcement and External Affairs
Bryan Clark	Director, Reliability Analysis
Julie Peterson	Assistant Corporate Secretary and Senior Counsel
<b>Guests</b>	
<b>Name</b>	<b>Organization</b>
Ronald Bauer	Madison Gas and Electric Company
Joseph DePoorter	Madison Gas and Electric Company
Ken Burruss	Midwest Energy
Tina Adams	Western Farmers Electric Cooperative
Fred Meyer	Algonquin Power Co.
Mary Agnes Nimis	Federal Energy Regulatory Commission

Karen Demos	NextEra Energy Resources, LLC
Larry Brusseau	Corn Belt Power Cooperative
Nikki Dacus	Western Farmers Electric Cooperative
George Brown	Acconia Energy
Angela Wheat	Southwestern Power Administration
Kelly Heims	Central Iowa Power Cooperative
Mark Hardaway	Western Farmers Electric Cooperative
Terry Volkmann	Glencoe Power & Light
Michael Brytowski	Great River Energy
Lori Frisk	Minnesota Power Company
Erin Cullum Marcussen	Southwest Power Pool
Duan <u>e</u> Gavel	City Utilities of Springfield, MO
David Heins	Omaha Public Power District
Derek Cherneski	Saskatchewan Power Corporation
Jenifer Holmes	Alliant Energy
Terry Harbour	MidAmerican Electric Company

**Quarterly Self-Certification Schedule Worksheet Review**

*Terri Pyle, CMEP Advisory Council Chair*

**Action**

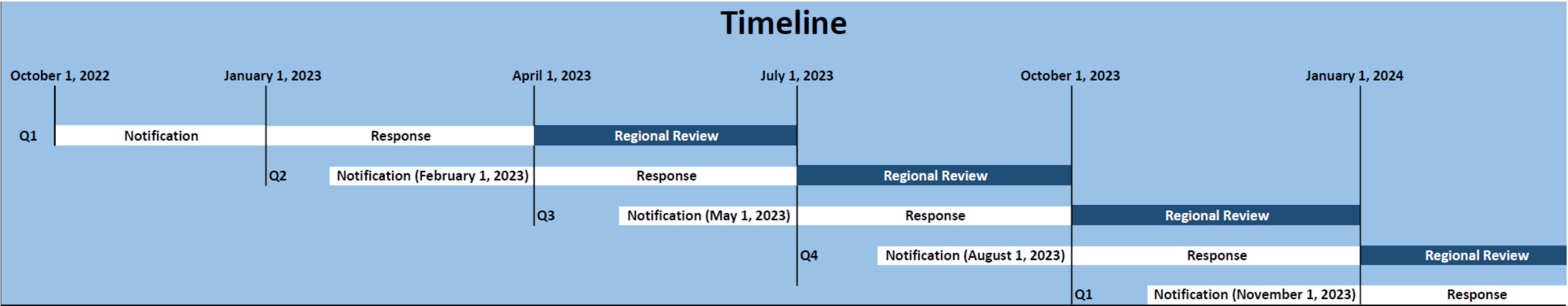
Review and Discussion

**Report**

Terri Pyle will lead this discussion. The schedule will begin on the next page.

MRO SELF-CERTIFICATION SCHEDULE AND TIMELINE Q1 2023-Q1 2024

Quarter	Standard	Requirements
1 2023	CIP-009-6	R1, R2
1 2023	VAR-002-4.1	R1, R3
3	CIP-008-6	R1, R2
3	FAC-008-5	R3
4	PRC-024-3	R1 ,R2
1 2024	FAC-008-5	R1, R2



**CMEP Quarterly Discussion**

a. Requirement Specific RFIs

*Bill Steiner, MRO Director of Risk Assessment & Mitigation*

**Action**

Information

**Report**

Bill Steiner will lead this discussion during the meeting.





MIDWEST  
RELIABILITY  
ORGANIZATION

# Requirement Specific RFI project

**Bill Steiner, Director of Risk Assessment and Mitigation**

CLARITY

ASSURANCE

RESULTS

# Requirement Specific RFI

- **What is it?**
- **Why are we doing it?**
- **Who is developing it?**
- **How will this help?**
- **Do I need a non-compliance to take advantage of this tool?**



# Requirement Specific RFI

- **What is it**
  - A canned Requirement Specific Request for Information (RFI) to provide typical data request that RAM will need to determine root cause, extent of condition, and risk for a discovered non-compliance.
  - The project will help develop the RFI in a manner that will request information consistent with the risk and discovery method (Internal controls important here)



# Requirement Specific RFI

- **Why are we doing it – Many Goals:**
  - To provide foresight to entities into the type of information we will be asking for in the event of a non-compliance.
  - Allow effective means to communicate internal controls – which will also be an input to COPS.
  - Help streamline processing of non-compliances by RAM by having the information needed to process the non-compliance without numerous individual RFI's.



# Requirement Specific RFI

- **Who is developing it:**
  - The CMEP Advisor Council will be leading this effort with the support of RAM.
  - The pilot will address two requirements:  
FAC-008 –R6 (David Gadberry)  
CIP-007 – R2 (Udhay Ganesan)



# Requirement Specific RFI

- **How will it help:**
  - Assist your compliance programs by having advanced information on the type of data that may be requested.
  - Provided a consistent description of internal controls that were used to detect or reduce the impact of the non-compliance. This can be documented in advance.
  - Improved processing efficiency of non-compliances.



# Requirement Specific RFI

- **Do I need a non-compliance to take advantage of this tool?**
  - No – At the successful completion of the pilot – the RFI's for each competed requirement will be available on the MRO website.
  - Entities will be encouraged to submit their documented internal controls independent of an existing non-compliance.



**CMEP Quarterly Discussion**

b. Compliance Oversight Plan FAQs

*Jeff Norman, MRO Director of Compliance Monitoring*

**Action**

Information

**Report**

Jeff Norman will lead this discussion during the meeting.





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ORGANIZATION

# COP FAQ Update

Jeff Norman

Director of Compliance Monitoring

CLARITY

ASSURANCE

RESULTS

# COP FAQ Location

- <https://www.nerc.com/pa/comp/Pages/CAOneStopShop.aspx>

- Click on “Compliance”
  - Click on “Risk” subsection

## One-Stop-Shop (CMEP, Compliance, and Enforcement) - Active

### Documents

#### Compliance (37)

CIP ERT & User Guide (3)

CIP FAQs (1)

Compliance (10)

Coordinated Oversight (4)

Guidance (3)

Hotline (1)

Implementation Plan (4)

Internal Controls (1)

Investigations (1)

NIST (3)

Program Alignment (1)

Risk (3)

Compliance Oversight Plan (COP) FAQs

Compliance Oversight Plan (COP) Report Template

ERO Enterprise Compliance Oversight Plan Presentation Slides

Technical Feasibility Exception (2)



CLARITY

ASSURANCE

RESULTS

# COP vs IRA

## IRA

- **What an Entity Owns and Operates**
- **Can not be modified by performance**

## COP

- **Factors in Performance Information**
  - Compliance History
  - Culture of Compliance
  - System event History
  - Internal Controls



# FAQ

- **Purpose**
  - Needed for Risk Based Monitoring
  - Transparent to assist industry
- **COP ≠ Audit Scope**
- **Risk Elements (CMEP IP), Risk Factors (IRA), vs Risk Categories (COP)**
- **Demonstrated Positive Performance**
  - High Bar
  - Impact



# Timing

- **Initial COP**

- MRO has completed all BA, RC, and TOP
- Developing schedule for the rest
  - Trying to coordinate schedule with Align COP release date

- **Updates**

- Monitoring Activities
- Change in IRA
- Has become too dated



**CMEP Quarterly Discussion**

c. CMEP Quarterly Report Schedule

*Tasha Ward, MRO Director of Enforcement and External Affairs*

**Action**

Information

**Report**

Tasha Ward will lead this discussion during the meeting.



# Quarterly CMEP Summary Report

## Midwest Reliability Organization

### December 31, 2022

This document was prepared to provide a quarterly summary of areas addressing key issues, trends, and significant events in the MRO region related to its delegated authorities set forth in the Compliance Monitoring and Enforcement Program (CMEP). Starting in 2023, the publishing schedule will be changing from quarterly to bi-annual (after Quarter 2 and Quarter 4).

### Key Issues in Compliance, Risk Assessment and Mitigation, and Enforcement

#### *Compliance Oversight Plans (COPs)*

A Compliance Oversight Plan (COP) is an entity-specific oversight strategy that begins with an assessment of the entity's inherent risk, existing controls, and prior performance. This process includes a detailed review of the entity's registration, compliance history, system performance and event history, and other risk factors. The resulting COP identifies what reliability standards are the focus for future compliance monitoring activities based on the entity's risk. The COP also identifies the appropriate interval for MRO's monitoring activities and the type of tools that should be expected during oversight. MRO has completed 12 of the 15 COPs scheduled to be developed in 2022. MRO continues to innovate the COP process and is working on a streamlined process for low-inherent risk entities and is also developing tools for analyzing COPs across multiple organizations to identify trends and develop outreach opportunities, which will be utilized annually.

#### *2022 Compliance Audit Status*

MRO completes periodic Compliance Audits to assess registered entities' compliance with the NERC Reliability Standards. MRO staff completed 13 of the 13 scheduled Compliance Audits for 2022. MRO has provided resources for four coordinated oversight audits led by another region and will provide resources for an additional one coordinated oversight audits. MRO also participated in two coordinated oversight Spot-Check led by another region. Coordinated oversight is a joint engagement with other regions for ERO approved multi-regional registered entities. Coordinated oversight Compliance Audits allow for more efficient monitoring activities for the affected registered entities. MRO also leverages these engagements to identify and share best practices with the other Regional Entities.

#### *Self-Certifications*

In between scheduled Compliance Audits, registered entities complete Self-Certifications of NERC Reliability Standards. MRO has revised the Self-Certification scoping process and implemented a guided Self-Certification process. The risks identified in the MRO Regional Risk Assessment and the ERO Enterprise CMEP Implementation Plan are the two primary considerations for guided Self-Certification scoping. The advantage of using Self-Certifications is that it allows MRO to address continent-wide risks and region-wide risks throughout MRO's footprint through a single process at a faster interval than Compliance Audits. MRO's Self-Certification schedule is available on its [website](#).

### *Highly Effective Reliability Organizations® (HEROs) Update*

The MRO Risk Assessment and Mitigation (RAM) department continues to monitor and respond to questions submitted to [Heros@mro.net](mailto:Heros@mro.net). This feedback tool is widely used by MRO registered entities and serves as a great mechanism for fielding compliance related questions. This email address has received more than 400 questions since implementation in November of 2016. Over the last quarter, MRO has received 9 HEROs questions with an average response time of 19 days. This average is significantly better than the 30-day response goal.

### *WebCDMS Transition to ALIGN*

The transition to ALIGN from webCDMS as our primary CMEP tracking/communication tool continues to be a significant effort in 2022. The final migration of open cases and integration of Canadian entities into the ALIGN system is scheduled to be completed in the 2<sup>nd</sup> quarter of 2023.

### *Risk Determinations Associated with Self-Logged Issues of Noncompliance (Figure 1 and Figure 2)*

Figure 1: Total Registered Entities Self-Logging by Regional Entity, shows that as of December 31, 2022, there are 31 MRO entities participating in the Self-Logging program which accounts for 30 percent of all ERO Self-Logging participants. Self-Logged instances of noncompliance submitted by these participants are monitored separately as the program is designed to quickly resolve minimal risk issues that are self-identified by entities. These issues are presumed minimal risk Compliance Exceptions (CE), however, MRO has the discretion to elevate the disposition based on the RAM risk determination analysis. MRO is continually evaluating its process and outreach to improve processing efficiencies and validation of minimal risk noncompliance.

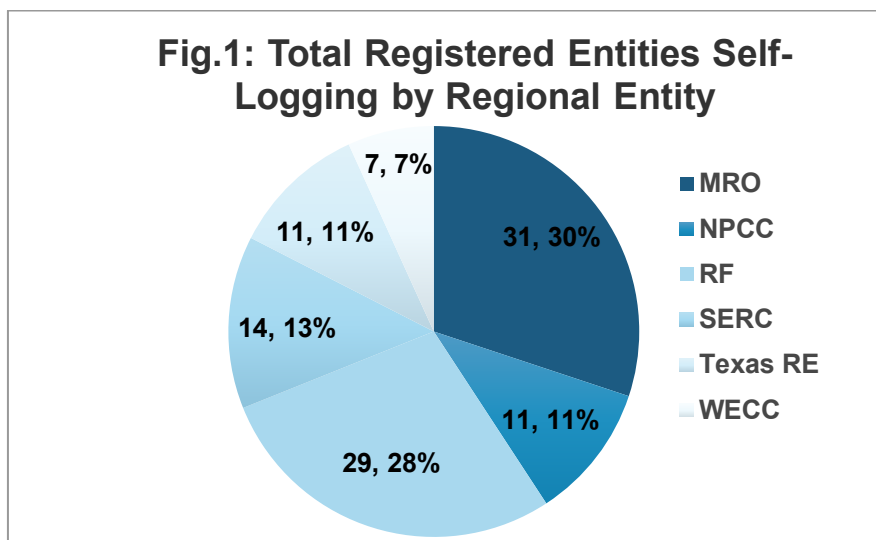
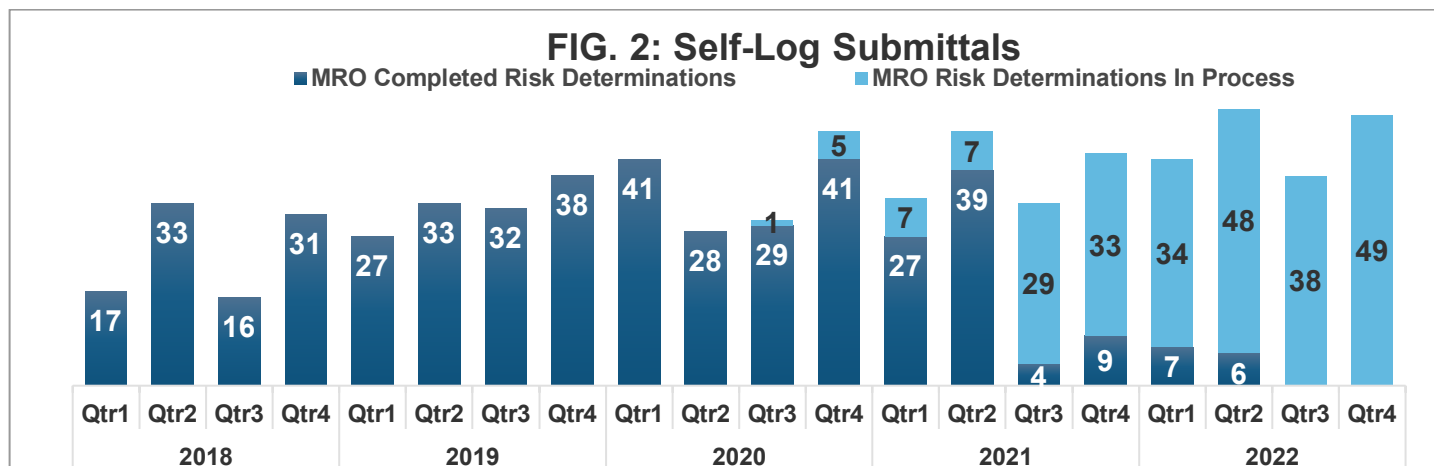


Figure 2: Self-Log Submittals, illustrates Self-Logged instances of noncompliance by submittal dates. Please note submittal dates are not the start of potential noncompliance or when MRO completed its risk determination analysis.



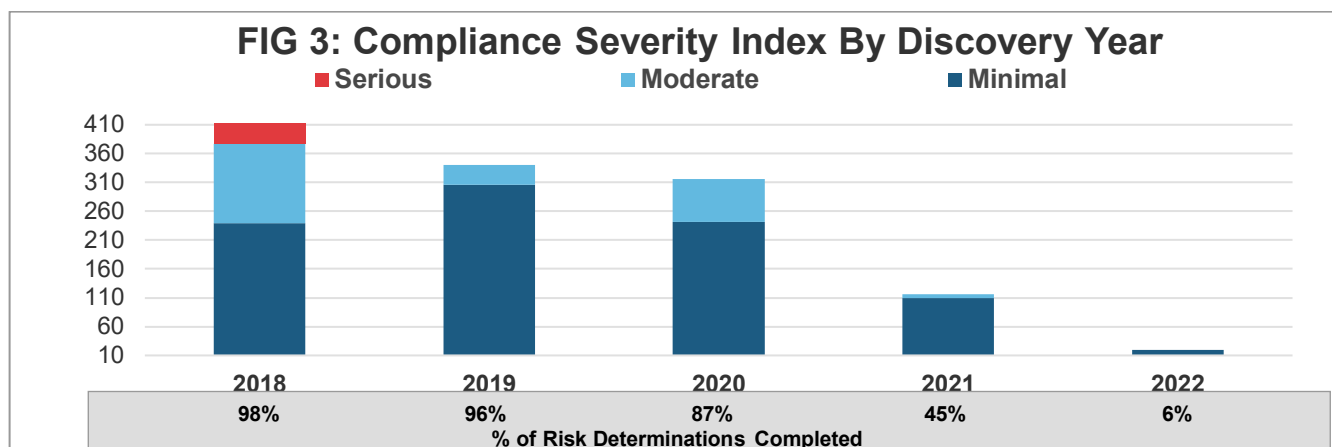


## Risk Assessment and Mitigation Trends

In the following charts and statistics, the numbers reflect all historic issues of noncompliance in the expanded MRO region.

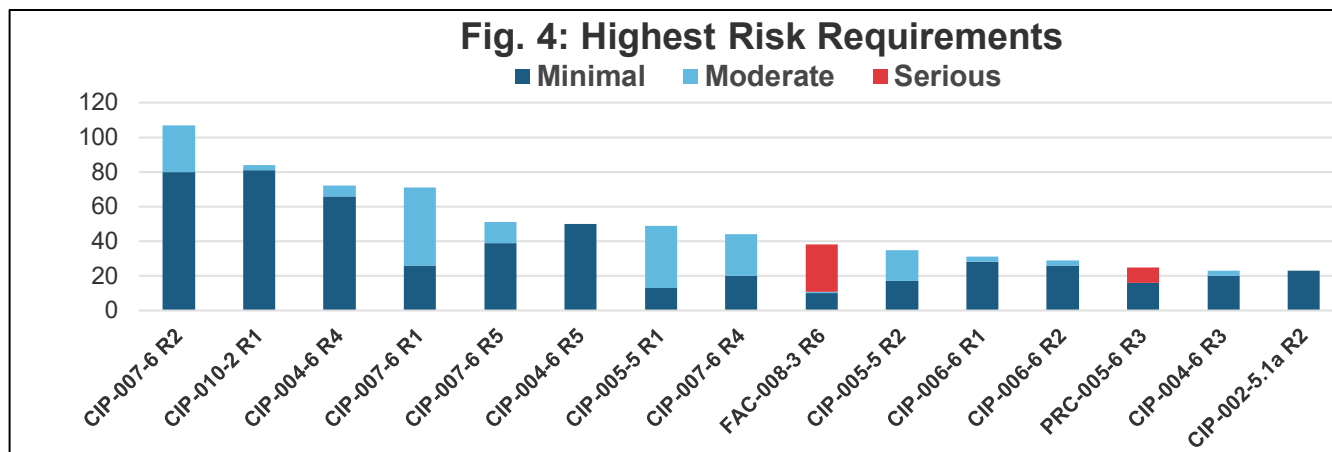
### Compliance Severity Index (Figure 3)

MRO staff use the Compliance Severity Index (CSI), shown in Figure 3, to evaluate progress toward a key reliability goal of less severe violations. The CSI represents the total risk that instances of noncompliance bring to the reliability or security of the bulk power system in the MRO region. The CSI is calculated using the risk determination and Discovery Method for each noncompliance. MRO has seen a notable decrease in the risk of issues of noncompliance over the past decade due to an overall improvement in the culture of compliance. Registered entities are self-identifying issues of noncompliance in a timely manner prior to issues presenting a greater risk to reliability.



### Highest Risk Issues of Noncompliance (Figure 4)

Figure 4 provides the 15 highest risk requirements, from January 1, 2018 to December 31, 2022, that have a history of issues of noncompliance, based on the CSI. Higher risk violations are associated with cyber and physical security standards, accurate facility ratings, and timely maintenance of protection systems.

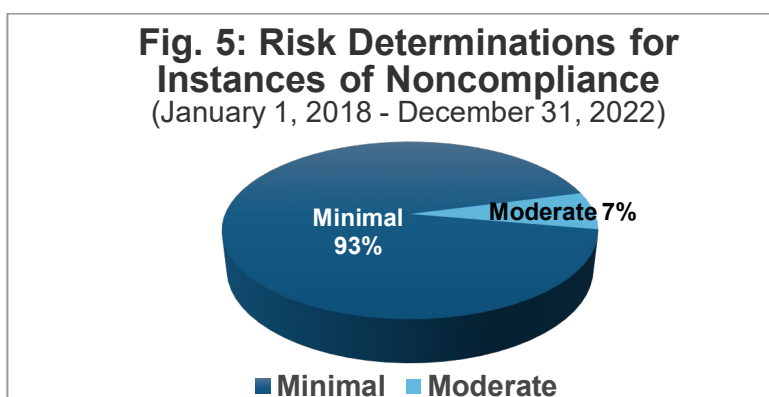


*Description of the Top Five Highest Risk Requirements (Figure 4)*

- CIP-007-6 R2: Requires a patch management process for tracking, evaluating, and installing cyber security patches for applicable Cyber Assets. A high volume monthly requirement in which even the most mature security programs will have an occasional non-compliance.
- CIP-010-2 R1: Requires current baseline configurations for applicable Cyber Assets.
- CIP-004-6 R4: Implement access management programs which authorize access to applicable BES Cyber Systems.
- CIP-007-6 R1: Intended to minimize the attack surface of BES Cyber Systems through disabling or limiting access to unnecessary network accessible logical ports and services and physical I/O ports.
- CIP-007-6 R5: Has a method(s) to enforce authentication of interactive user access to applicable Cyber Assets

*Risk Determinations for Issues of Noncompliance (Figure 5)*

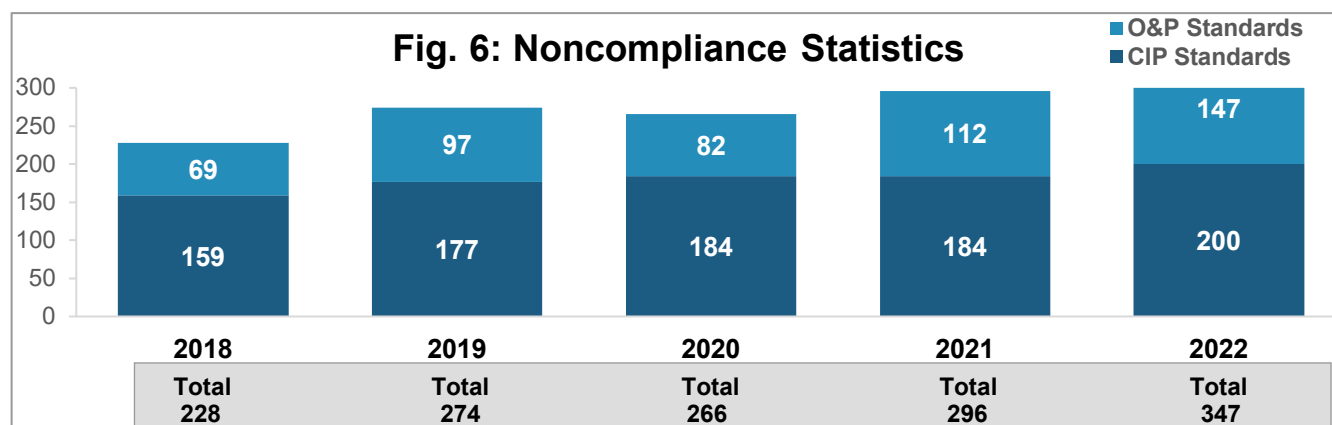
Ninety percent of all instances of noncompliance from January 1, 2018 to December 31, 2022, were determined to be minimal risk. There is a correlation between the increasing percentage of issues of noncompliance being minimal risk (Figure 5) and the increasing percentage of self-reported issues of noncompliance (Figure 7). Entities are identifying noncompliance earlier before the issues become more impactful to the reliability and security of the bulk power system.



## Noncompliance Trends and Statistics

### *Breakdown of Critical Infrastructure Protection (CIP) vs. Non-CIP Possible Issues of Noncompliance (Figure 6)*

The noncompliance statistics and trends in Figure 6 are annually discovered and reported to NERC from January 1, 2018 to December 31, 2022.



### *Registered Entity Responsibility (Figures 7 and 8)*

MRO staff analyzes how often registered entities self-identify and accept responsibility for noncompliance. These trends are indicators of the commitment among registered entities in the region to perform self-assessments of their compliance with the reliability standards. The high percentages, reflected in Figure 7 and Figure 8, demonstrate a strong governance and compliance culture of registered entities in the MRO region, as well as registered entities' willingness to accept, and learn from, discovered issues of noncompliance in order to prevent future noncompliance with NERC Reliability Standards.

Figure 7 reflects issues of self-identified noncompliance that MRO processed from January 1, 2018 to December 31, 2022.

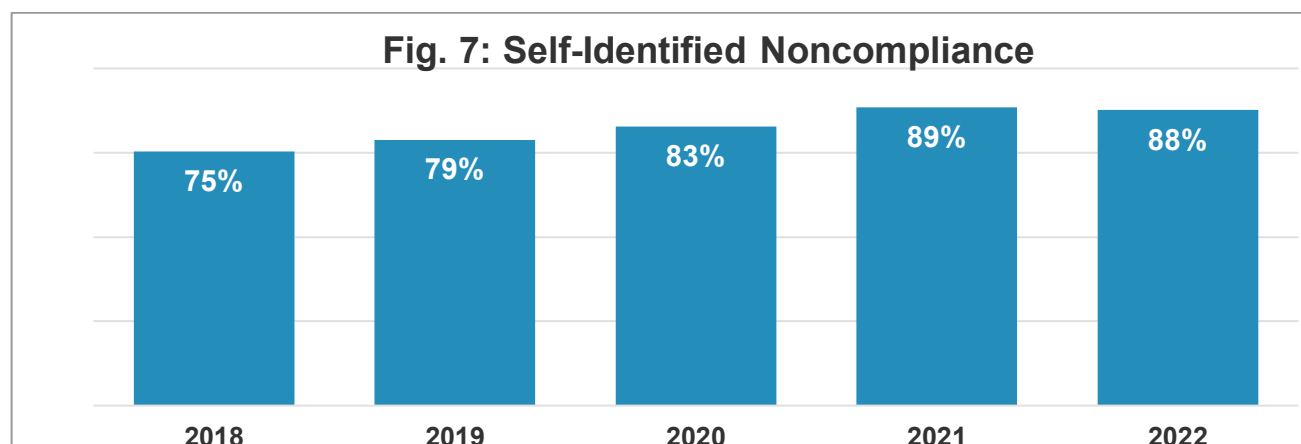
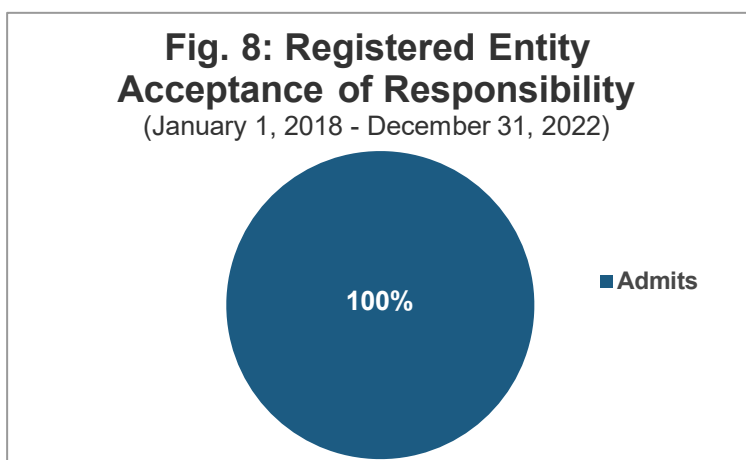




Figure 8 shows the percentage of time that registered entities have accepted responsibility for noncompliance submitted to NERC or other applicable Regulatory Authority from January 1, 2018 through December 31, 2022.



Discovery Method Detail (January 1, 2018 through December 31, 2022) (Figure 9)

In Figure 9, the numbers reflect all noncompliances in the MRO region that were reported to NERC or other applicable Regulatory Authority.

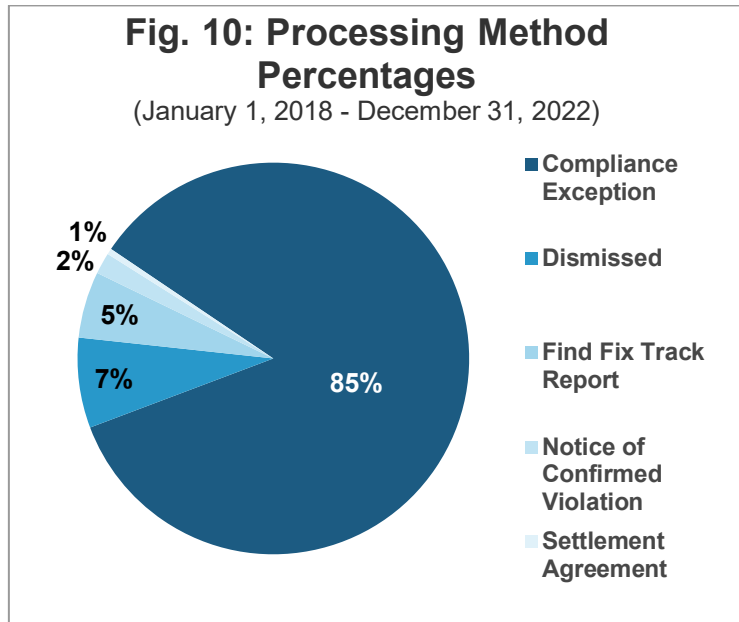
Figure 9: Discovery Method								
Discovery Method Detail	2018	2019	2020	2021	2022	Sub Total	(-less) Dismissed	Total
Compliance Audit	33	47	40	18	18	156	19	137
Compliance Investigation	0	0	0	0	0	0	0	0
Data Submittal	0	0	0	0	0	0	0	0
Self-Certification	23	11	6	16	24	80	11	69
Self-Log	97	130	145	155	182	709	7	702
Self-Report	75	86	75	107	123	466	26	440
Spot Check	0	0	0	0	0	0	0	0
Totals	228	274	266	296	347	1411	63	1348

*Noncompliance Processing (Figure 10)*

MRO staff analyzes trends in the status of noncompliance processing by compiling all available processing methods, the average age of open noncompliances, and the closure percentage of noncompliances for each year. This analysis indicates progress towards simpler, more expedited processing due to the increased use of CEs to process minimal risk noncompliance.



Figure 10 includes issues of noncompliance for entities that were registered in the MRO region during the specified time period.



*Noncompliance Processing Time (Figures 11 and 12)*

Figure 11 illustrates the trend of the average age for open noncompliances in MRO's inventory. The average processing for these open noncompliances is calculated by using the date reported to MRO until the last day of the noted quarter or specific date indicated and taking the average of the calculated days.

**Fig. 11: Quarterly Aging Average for Noncompliance Reported to NERC and Currently in Process**

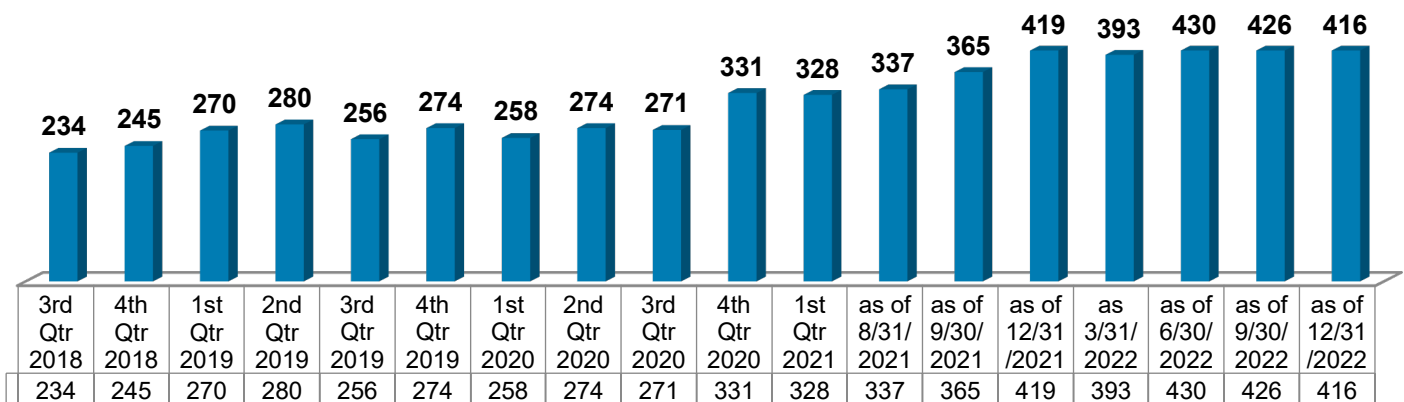
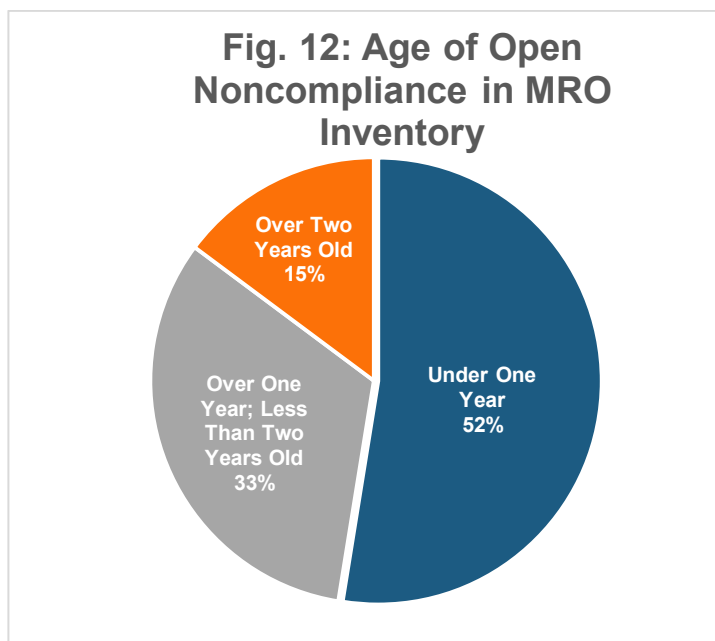


Figure 12 illustrates the aging time for all open instances of noncompliance reported to MRO and applicable government authority.



**For questions on this report, please contact the following individuals:**

**Compliance Monitoring:** Jeff Norman at 651-855-1703 or [jeff.norman@mro.net](mailto:jeff.norman@mro.net)

**Risk Assessment and Mitigation:** William Steiner at 651-855-1718 or [william.steiner@mro.net](mailto:william.steiner@mro.net)

**Enforcement:** Tasha Ward at 651-256-5188 or [tasha.ward@mro.net](mailto:tasha.ward@mro.net)

**Standing Reports**

- a. NERC Compliance and Certification Committee (NERC CCC)  
*Erin Cullum Marcussen, NERC CCC Member*

**Action**

Information

**Report**

This report will be start on the next page

## CCC Report

February 1-2, 2023

Hybrid Meeting

CLECO Offices

The meeting began with remarks from Robbie Laborde, Jr. Chief Operations and Sustainability Officer, CLECO.

### 2023 ERO Enterprise CMEP Implementation Plan (CMEP IP)

Kiel Lyons, NERC, provided an overview of the CMEP IP.

The CMEP IP is a living document and can be updated throughout the year. Risk elements are developed using both data (compliance monitoring and enforcement data and risk report, state of reliability report, long term reliability assessment) and the expert judgement of ERO staff. The intended use by CMEP staff is to focus on compliance monitoring and to message to industry on the areas of emphasis for CMEP activities. The intended use by a Registered Entity is for the CMEP IP to be used in conjunction with entity specific COPs, considered in compliance operations focus, and in the enhancement of internal controls. For 2023, the focus is a continued emphasis on focus and usability. The risk elements reflect a combined ERO Enterprise view—focus to increase relevance to impacted registered entities, reflects high level priorities for CMEP, and relevance based on registered entity's facts and circumstances. The 2023 risk elements are:

Table 2: 2023 Risk Elements
Remote Connectivity
Supply Chain
Incident Response
Stability Studies
Inverter-Based Resources
Facility Ratings
Cold Weather Response

The CMEP IP is posted on the NERC One Stop Shop. Kiel explained that they make sure that the risk elements are tied to enforceable standards. It was suggested that NERC gather feedback from owners and operators to consider the risk profile from those perspectives. Kiel explained that is why the attempt to rely so heavily on the various reports and data cited above.

### Align User Group

Scott Tomashefsky provided a brief update on the Align User Group. There is potential for having additional CCC members participate in the user group based on expertise. Communication is really



important. NERC remarked on the quality information previously provided and NERC is considering how to use it as it..

### Standards Process Improvement Overview and Next Steps

Marisa Hecht provided background on Standards Process Improvement activities and the following recommendations:

- (1) The SCCG should work to expend participation in the RS Quality Review process, with an emphasis on adding expertise in Compliance;
  - This would allow time to review and make sure wording doesn't cause compliance issues. Would allow for about a week's timeframe to review.
- (2) SCCG should review the Standards Authorization Request (SAR) form and recommend revisions to enhance the role of this important tool in this standards process
- (3) SCCG should perform a regular review of new standards projects to aid in effective project prioritization
  - Do this on a quarterly basis, and make sure that feedback loops are maintained.

Concerns were raised about removing the final ballot, as it is the final check by industry to review and raise any issues. NERC indicated that it is important for entities to be engaged all the way through. NERC clarified that there are no changes that occur between the last ballot and the "final" ballot. It was also clarified that there may be confusion in the industry that if changes are made that it doesn't go to final ballot, it goes to another successive ballot. There are no substantive changes made to a final ballot.

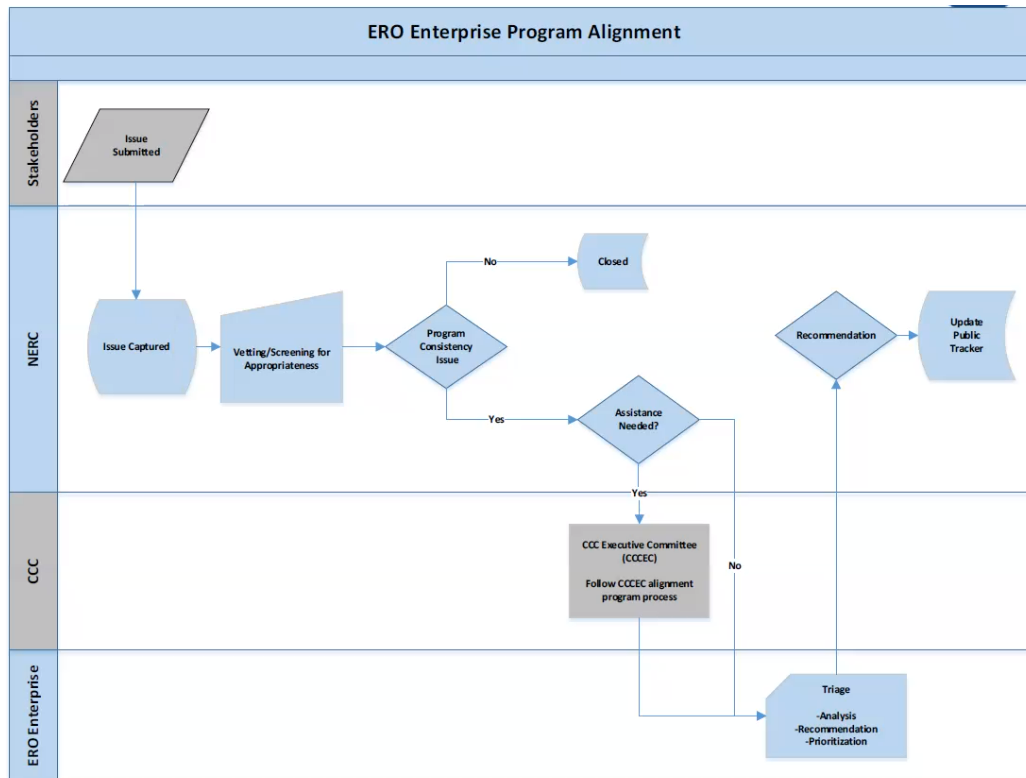
The expectation around what happens after industry comments. For ROP, it would go to the Board and FERC. For standards processes manual, that is balloted, goes to NERC Board, and then FERC.

Other recommendations that are not to ROP, are being implemented throughout this year.

### Q1 Focused Discussion: ERO Enterprise Program Alignment Process and Consistency Efforts

NERC maintains a consistency tool for entities to report alignment concerns; however, there has not been much industry use of the consistency tool. There are likely a number of contributing factors to this issue. And while concerns have been raised that nothing is done when it is used, this is unlikely to be the sole reason for lack of use. This may also be a function of communication rather than inaction, as it seems that there is not a high degree of understanding that the tool exists or when/how to use it. It would be a fallacy to assume that there are no consistency issues because no one is using the tool. Therefore the broader question on consistency issues remains, and it is important to revisit this tool, its usage, and industry understanding of the tool.

The NERC website page and flowchart was reviewed. Once an issue is submitted (anonymously or not, it is easier to communicate if not anonymous). It then goes to NERC for screening. If it is a program consistency issue then it may go to CCC for the alignment program process if assistance is needed, then back to ERO for triage, and then back to NERC for a recommendation. If assistance is not needed, it goes straight to the ERO. Flowchart is below:



A question was raised about how many times CCCEC was engaged. The last “alignment” issue was in 2020, but CCCEC was not engaged. The Practice guides are sent to CCCEC, however. Question on how the Regional Entities are engaged, specifically if an issue is raised from a specific RE is that RE engaged? NERC explained they would have to look at the specific issue and determine who needs to be involved.

Concerns were raised about how aware industry outside of CCC is of the alignment process. Feedback provided was that people either weren’t aware of the tool or that people were aware of it but weren’t exactly sure how or when to use it. Additional messaging and communication is needed. Perhaps some communication about a success story would help. In addition, it was noted that it is both buried so far down in the website that it is difficult to find and that the name of the page doesn’t really make it clear what it is. Another issue is that the tool seems intimidating and formal. Many people are more inclined to pick up the phone and reach out to someone they know at NERC or at an RE. Any re-rollout of this tool will be important to help address that feeling of formality and share examples of people using it, so that others feel more comfortable. One person shared a feeling of retaliation for raising an issue, and another person shared that some entities do not want to share the inconsistency for fear that other regions will pick up the approach. Another point raised was that people do not feel like the submission will help them, or it will not help them quickly enough. A suggestion was made that the flowchart contain a timeframe for a response, because people get antsy when its unclear what the timing looks like.

We don’t want consistency to drive changes in the wrong direction. WECC had to stop posting info that was helpful because it was an outlier compared to the other regions.

Complaints were raised regarding regional entities auditing to newsletter articles and are even writing violations based on those articles. The commenter indicated that these articles do not align with the standard language. NERC responded that they would be very concerned if this is happening and asked that if there are examples of audits being conducted based on practice guides or articles, NERC would want to know. Those are meant to drive questions or discussion but should not be the basis for a violation.

One person explained that the complaints seem to be less about the consistency as they are about what we are supposed to comply with. If there are gaps in the standards we should be pushing to close the gaps in the standards following those processes.

This will be continued in Q2 and a working group will be established to work with NERC and ERO staff on the reporting tool and outreach.

The next meeting of the CCC is April 25-27, 2023 in Austin, TX at the ERCOT offices.

## Standing Reports

- b. NERC Standards Committee (SC)  
*Troy Brumfield, NERC SC Member*

### Action

Information

### Report

- The SC met via hybrid meeting on December 13, 2022.
- **General items of note from the SC chair included:**
  - There is a joint standards grading task force with the CCC that is being formed and looking for volunteers from SC members to participate.
  - The SC was informed that Troy Brumfield is a new member to the SCPS as well as the new Vice Chair while Matt Harward is the new SCPS chair.
- The committee reviewed the NERC Project Tracking spreadsheet and shared the status of Reliability Standards Projects under Development.
- NERC projects/initiatives approved and will progress to the next phase of the Standards development process:

#### Standards Committee 2023-2025 Strategic Work Plan

The SC chair reviewed the 2023-2025 Strategic Work Plan and noted there are new focus areas. The SC will work on enhancing processes; SC and CCC members will review the processes in lieu of standards grading and look at project prioritization

#### SDT Project Updates

Project updates were provided for:

- **Project 2016-02 Modifications to CIP Standards** - SDT is reviewing comments received from draft 4 ballot and will work to modify CIP-005 and CIP-010 early 2023 following with a draft 5 comment and ballot period in March 2023.
- **Project 2019-04 Modifications of PRC-005-6** – Technical rationale and FAQ, now complete. The team is making final edits to standard and supporting document prior to going to Quality Review.
- **Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination** - The team has started phase 2 drafting work. An Initial ballot for phase 2 is expected in January/February of 2023.
- **Project 2017-01 Modifications to BAL-003-1.1** - The SDT is working to move the project to an additional formal 45-day comment period with 10-day ballot

#### Project 2022-04 EMT Modelling- Appoint chair, vice chair, and members to SAR-DT

SC members commented on the lack of experience the SAR-DT nominees have and asked NERC to solicit industry for individuals that possess the experience necessary to move this project forward successfully. The motion to appoint chair, vice chair, and members to the SAR-DT as recommended by NERC staff was approved.

### Project 2020- 04 Modifications to CIP-012- Supplemental Nominations

NERC provided an overview of the project. The committee approved a motion to appoint supplemental members to the Drafting Team (DT).

### Standards Process Stakeholder Engagement Group Recommendations

NERC BOT directed NERC staff to examine the Standards Development rules and, considering stakeholder feedback, recommend changes that the SC should implement to the development process:

- Improve NERC’s ability to address urgent reliability needs.
- Maintain appropriate agility,
- Allow for continued Standards Development Process effectiveness and public/industry feedback.

Comments were made re: to the BOT previous comments about the role of the SC and how the committee could fulfill the request while not providing technical guidance.

It was mentioned that the SC should provide guidance on how to write a SAR to be open for possibility and scoping in the drafting phase; possibly by revising the SAR form. The goal of the SAR is to address reliability issues, solutions are to be recommended and approved by the SDT and industry in later phases of the development process.

### 2023 Standards Committee Executive Committee Nominations

NERC informed the committee that the SCEC election will occur at the January 2023 SC meeting. Anyone interested in participating on the SCEC should submit a biography to the chair, vice chair, and secretary by January 9, 2023

### Project posting schedule and Project tracking spreadsheet

[NERC Project Tracking Spreadsheet](#)

[NERC Project Posting Schedule](#)

- Legal updates and Review of filings were provided.
  - Adjournment

**Standing Reports**

c. NERC RS&T Committee (NERC RSTC)

*Jeff Norman, MRO Compliance Monitoring Director and CMEP Advisory Council Liaison*

**Action**

Information

**Report**

Jeff will lead this discussion during the meeting

**Standing Reports**

- d. MRO NERC Standards Review Forum (NSRF)  
*George Brown, NSRF Chair*

**Action**

Information

**Report**

This report will begin on the next page.

**First Quarter 2023 Report**  
**George E. Brown, Chair**  
**Matt Harward, Vice Chair**

## **I. General**

- NSRF Membership: 18/21
  - Cooperative: 3/3
  - Canadian Utility: 2/3
  - Federal Power Marketing Agency: 2/3
  - Generator and Power Marketer: 2/3
  - Investor Owned Utility: 3/3
  - Municipal Utility: 3/3
  - Transmission System Operator: 3/3

### ➤ **2022 Review:**

- NSRF Meeting Held: 47/52 possible.
- NSRF Member & Guest Meeting Attendance, average per week: 84
- NSRF Member Attendance, average per week: 75%

### ➤ **Year to Date:**

- NSRF Meeting Held: 5/6 possible.
- NSRF Member & Guest Meeting Attendance, average per week: 87
- NSRF Member Attendance, average per week: 76%

## **II. Activity**

The NSRF continues to focus on reviewing, developing recommendations and providing feedback on potential NERC Reliability Standard requirements, including any associated supporting documentation.

### ➤ **2022 Review:**

- NERC Standard Projects, SARs, NOPRs, et cetera Reviewed, on average per week: 3
- Total NSRF Comments Submitted: 22
- Total NSRF Voting Recommendations Made: 84

### ➤ **Year to Date:**



- NERC Standard Projects, SARs, NOPRs, et cetera Reviewed, on average per week: 1
- Total NSRF Comments Submitted: 2
- Total NSRF Voting Recommendations Made: 6

➤ **Activity Since Last Report:**

- Project 2021-04 – Modifications to PRC-002 | Draft 2:  
Comments Submitted & Ballot Recommendation Provided
- Project 2021-01 – Modifications to MOD-025 and PRC-019 | Draft 1:  
Comments Submitted & Ballot Recommendation Provided
- Project 2020-04 – Modifications to CIP-012 | Draft 3  
Comments Submitted & Ballot Recommendation Provided
- Project 2021-05 – Modifications to PRC-023 | Draft 1  
No Comments Submitted & a Ballot Recommendation Provided
- Project 2022-05 Modifications to CIP-008 Reporting Threshold | SAR  
Comments Submitted
- Project 2021-06 – Modifications to IRO-010 and TOP-003 | Draft 1  
Comments Submitted & Ballot Recommendation Provided
- Project 2021-03 CIP-002 Transmission Owner Control Centers | SAR  
Comments Submitted
- Project 2021-02 Modifications to VAR-002-4.1 | Draft 1  
Comments Submitted & Ballot Recommendation Provided
- Project 2020-06 – Verifications of Models and Data for Generators | Draft 2  
Comments Submitted & Ballot Recommendation Provided

### **III. Emerging Challenges, Risks & Opportunities**

The NSRF is a volunteer Forum that is comprised of industry professionals who understand that all NERC Reliability Standards must mitigate either a current risk or emerging risk to the BPS. The NSRF is building on the foundation that the CMEPAC and MRO Staff has set for our current and future state of reliability. Our challenge is to continually have a single voice that represents the entire MRO membership.

- Ensuring the NSRF membership is without open seats.

- o Consideration of any open NSRF membership seats become 'At-Large Seats' that are open to any industry sector, have a term of no greater than one year and no voting rights.

➤ **Open Actions from 1Q2022 CMEPAC Meeting:**

- The CMEPAC was not opposed to having 'At-Large Seats' on the NSRF. A small group meeting will be held to discuss this topic further and outline requirements/restrictions associated with having 'At-Large Seats' to further vet the possibility. Small group meeting pending.
- Update, on October 27, 2022, the NSRF charter was discussed. A recommendation to the meeting attendees to be made by November 30, 2022.
- GE Brown & M Harward to discuss next steps.

**IV. Questions for the MRO Compliance Monitoring and Enforcement Program Advisory Council**

- None

**V. Other**

- None

**Standing Reports**

- e. Facilities Ratings Task Force (FRTF)  
*Jon Radloff, FRTF Representative*

**Action**

Information

**Report**

There is no report for the FRTF. The next meeting is on 2/24/2023.

**Standing Reports**

- f. NERC Supply Chain Task Force (NERC SCTF)  
*Mark Zellner, SCTF Representative*

**Action**

Information

**Report**

There is no report for the NERC SCTF at this time.

### Standing Reports

- g. Mid-Continent Compliance Forum (MCCF)  
*Mark Buchholz, CMEPAC and MCCF Member*

### Action

Information

### Report

The Mid-Continent Compliance Forum (MCCF) provides Registered Entities in the MRO footprint of the Eastern Interconnection a venue to share knowledge, lessons learned and best practices regarding compliance matters. The MCCF Board of Directors has been established to coordinate MCCF meetings, develop meetings agendas, and communicate on compliance matters and actions by MCCF members. The Board of Directors meet monthly via conference call or WebEx.

The MCCF Board of Directors last met on January 18, 2023, via WebEx. The MCCF Winter Meeting was re-scheduled from January 18, 2023, to February 15, 2023, from 1:00 to 4:30 pm due to technical issues. This meeting was held virtually.

Topics from MCCF meetings since the last report included: 2023 MCCF BOD Officer Elections and finalization of the agenda and presenters for the MCCF Winter Meeting.

The next MCCF Board of Director's Meeting is scheduled for February 22, 2023, via WebEx.

### Standing Reports

- h. SPP Reliability Compliance Advisory Group (RCAG)  
*Mark Buchholz, CMEPAC and RCAG Member*

### Action

Information

### Report

The SPP Reliability Compliance Advisory Group (RCAG) provides guidance on policy issues to the SPP RTO on reliability compliance activities of federal or regional regulators, or committees. It also provides expertise to other SPP Working Groups on membership issues related to regional compliance matters specific to execution, interpretation, or implementation of federal or regional regulatory requirements. The RCWG provides a stakeholder forum to encourage membership discussion of regional compliance issues and provide a means to communicate collectively membership concerns or issues with SPP RTO Compliance staff on matters of NERC Reliability Standard Compliance.

The SPP RCAG last met on February 13, 2023, via WebEx. Meeting minutes are available on the SPP.org website. Topics from RCAG meetings since the last report included: review of the SPP Incident Reporting Process; an update for SPP efforts associated with NERC Project 2019-06 - Cold Weather Data Specification requirements; an overview of NERC Project 2021-07 - Cold Weather; an update on SPP activities associated with FERC Order 881; and SPP Revision Requests for Transmission Reconfiguration, Emergency Limit Treatment, Joint Targeted Impact Queue, and Balancing Authority/Balancing Authority Area Language Clean Up in the SPP Tariff. No stakeholder meetings will be scheduled on-site for the foreseeable future.

The next SPP RCAG Meeting is scheduled for April 2023, date TBD, via WebEx.

**Subteam Reports**

- a. Conference Subteam  
*Tiffany Lake, Vice Chair*

**Action**

Information

**Report**

Vice Chair Tiffany Lake will provide an update during the meeting.

**Subteam Reports**

b. Newsletter Subteam  
*Mark Buchholz, CMEPAC Member*

**Action**

Information

**Report**

Mark Buchholz will provide an update during the meeting.



**Subteam Reports**

c. Calls Subteam  
*Carl Stelly, CMEPAC Member*

**Action**  
Information

**Report**

CMEPAC Monthly Call Metrics

Month	Attendees	Average Duration of Attendees
October 2020	54	47 Minutes
November 2020	57	56 Minutes
December 2020	47	48 Minutes
January 2021	74	65 Minutes
February 2021	78	54 Minutes
March 2021	75	47 Minutes
April 2021	65	46 Minutes
May 2021	70	54 Minutes
June 2021	63	68 Minutes
July 2021	72	67 Minutes
August 2021	70	53 Minutes
September 2021	73	48 Minutes
October 2021	59	72 Minutes
November 2021	54	59 Minutes
December 2021	54	56 Minutes
January 2022	71	57 Minutes
February 2022	52	61 Minutes

## Meeting Agenda – CMEP Advisory Council – 2/21/2023

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March 2022	57	67 Minutes
April 2022	66	61 Minutes
May 2022	58	59 Minutes
June 2022	51	61 Minutes
July 2022	64	37 Minutes
August 2022	53	27 Minutes
September 2022	63	55 Minutes
October 2022	52	41 Minutes
November 2022	55	45 minutes
December 2022	48	30 Minutes
January 2023	66	56 Minutes
February 2023	56	38 Minutes

Currently there are 159 registered for the monthly calls.

**Subteam Reports**

d. Webinars Subteam

*Terri Pyle, CMEPAC Chair*

**Action**

Information

**Report**

Chair Pyle will provide an update during the meeting.

**Subteam Reports**

- e. Subteam assignments  
*Terri Pyle, CMEPAC Chair*

**Action**

Discussion

**Report**

Chair Pyle will lead this discussion during the meeting.

**AskCMEPAC**

*Terri Pyle, CMEPAC Chair*

**Action**

Discussion

**Report**

Chair Pyle will lead this discussion during the meeting. The AskCMEPAC tracker is available on the collaboration site.

**OGOC Feedback**

*Tiffany Lake, CMEP Advisory Council Vice Chair*

**Action**

Information

**Report**

Tiffany Lake will lead this discussion during the meeting.

**Work Plan Updates**

- a. Finalize 2023 Workplan  
*Terri Pyle, CMEPAC Chair*

**Action**

Information

**Report**

The work plan is available on the CMEPAC Collaboration site. It will also be presented during the meeting. Please come prepared to discuss any updates or additions to the work plan.

**Work Plan Updates**

- b. Vote to recommend the 2023 CMEPAC Workplan to the OGOC for approval  
*Terri Pyle, CMEPAC Chair*

**Action**

Vote

**Report**

Vote to recommend the 2023 CMEPAC Workplan to the OGOC for approval



**Action Item Review**  
*Michelle Olson, CMEPAC Meeting Secretary*

**Action**

Discussion

**Report**

Michelle Olson will review all open action items and will discuss all action items logged from this meeting.

**Other Business and Adjourn**

*Terri Pyle, CMEPAC Chair*

**Action**

Discussion

**Report**

Chair Pyle will call for any other business and once all business handled the meeting will adjourn