



MIDWEST
RELIABILITY
ORGANIZATION

Meeting Agenda

Compliance Monitoring Enforcement Program Advisory Council (CMEPAC)

August 09, 2023
9:00 am to 3:00 pm central

MRO Corporate Offices, King Conference Center
St. Paul, MN 55102
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.**

Call to Order and Determination of Quorum

a. Standards of Conduct and Anti-Trust Guidelines

Terri Pyle, CMEPAC Chair

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.

MRO CMEP ADVISORY COUNCIL Q3 MEETING AGENDA

Agenda Item

- 1 Call to Order and Determination of Quorum**
Terri Pyle, CMEP Advisory Council Chair
 - a. Determination of Quorum
CMEPAC Meeting Secretary
 - b. Robert's Rules of Order
- 2 Standards of Conduct and Antitrust Guidelines**
Terri Pyle, CMEP Advisory Council Chair
- 3 Advisory Council Work Plans**
 - a. RAC
 - b. SAC
- 4 Consent Agenda**
Terri Pyle, CMEP Advisory Council Chair
 - a. CMEPAC Q2 Open Minutes
 - b. 2024 Meeting Schedule
- 5 Charter Review and Approval**
Terri Pyle, CMEP Advisory Council Chair
 - a. CMEPAC
 - b. NSRF
- 6 Annual CMEP Conference CIP Highlights**
Terri Pyle, CMEP Advisory Council Chair
- 7 Standing Reports**
 - a. Project Management and Oversight Subcommittee (PMOS)
Terri Pyle, CMEP Advisory Council Chair
 - b. Facilities Ratings Task Force (FRTF)
Jon Radloff, FRTF CMEPAC Representative
 - c. NERC Standards Committee (NERC SC)
Troy Brumfield, NERC SC Representative
 - d. NERC Compliance and Certification Committee (NERC CCC)
Erin Cullum Marcussen, NERC CCC Representative
 - e. MRO NERC Standards Review Forum (NSRF)
George Brown, NSRF Chair
 - f. MidContinent Compliance Forum (MCCF)
Mark Buchholz, CMEPAC and MCCF Member
 - g. SPP Reliability Compliance Advisory Group (RCAG)
Mark Buchholz, CMEPAC and RCAG Member

Break – 10:30 a.m.

- 8 Regional Risk Assessment Update**
Mark Tiemeier, MRO Principal Technical Advisor
- 9 Subteam Reports**
 - a. Conference Subteam
Matt Caves, CMEPAC Member
 - b. Monthly Call Subteam
Eric Ruskamp, CMEPAC Member

MEETING AGENDA – Compliance Monitoring Enforcement Program Advisory Council (CMEPAC) – August 09, 2023

c. Webinar Subteam

Bryan Dixon, CMEPAC Member

d. Newsletter Subteam

Theresa Allard, CMEPAC Member

e. Ask CMEPAC

Terri Pyle, CMEPAC Chair

10 RRA and Associated Standards Assessment

Terri Pyle, CMEP Advisory Council Chair

Lunch 12:00 p.m.

11 Work Plan Updates

Terri Pyle, CMEP Advisory Council Chair

12 Annual CMEP Conference O&P Highlights

Terri Pyle, CMEP Advisory Council Chair

13 Action Item Review

Michelle Olson, CMEPAC Meeting 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). |

| | | |
|-------------------|--|--|
| 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. |
|-------------------|--|--|

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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AGENDA

Advisory Council Work Plans

- a.
- b.

Action

Discussion

Report

Members from the AC and will review their work plans during the meeting.



MIDWEST
RELIABILITY
ORGANIZATION

MRO Security Department and Security Advisory Council (SAC)

Steen Fjalstad, Director of Security

Ian Anderson, SAC Chair

CLARITY

ASSURANCE

RESULTS

MRO Security Department

- **Identifies emerging risks, collaborates with entities and others to develop and support mitigation strategies**
- **Supports and collaborates with Security Advisory Council (SAC) and Security Advisory Council Threat Forum (SACTF), including the weekly SACTF threat call**
- **Supports Regional Security Risk Assessment**
- **Coordinates webinars and other outreach**
- **Supports GridEx**



SAC and SACTF 2023 Accomplishments

- **The SAC sponsored a webinar on the topic of Network Exposure on June 28, 2023**
- **The weekly Security Advisory Council Threat Forum Threat Call continues, with an average attendance of 68 attendees from 34 unique companies.**
- **Members of the SAC participated in an online round table working session to expand on the Regional Security Risk Assessment survey and engaged in discussion with representatives of member entities on security threats and priorities.**



Upcoming SAC Events

- **The 10th annual MRO Security Conference will be held September 26-28, 2023 in Oklahoma City**
- **A webinar on the topic of IT/OT Convergence is scheduled for August 29, 2023**
- **Potential additional webinars are under discussion**





Questions



MIDWEST
RELIABILITY
ORGANIZATION

2023 Reliability Advisory Council Work Plan

Bryan Clark, P.E.
Director of Reliability Analysis
August 8, 2023

CLARITY

ASSURANCE

RESULTS

#1 Conduct Outreach and Awareness

- Conduct a minimum of 2 webinars/outreach in 2023 to increase reliability and decrease risk to the reliable and secure operations of the bulk power system.



#2 Provide Reliability Standard Reviews

- Periodically attend NSRF meetings
 - *Energy Reliability Planning*
 - *Generation Unavailability During Extreme Cold Weather*



#3 Review Significant Events or Disturbances on the BES

- Review of an entity event at the Q3 Meeting
 - *Misoperations Due to Human Errors*
 - *Overhead Transmission Line Ratings*



#4 Development of the MRO Regional Risk Assessment

- Quarterly Risk Discussions
- Two resources provided from the RAC to support the Annual Risk Ranking exercise
 - *All MRO Reliability Risks*

#5 Support Regional Representation on NERC Organizational Groups

- Five different NERC groups with a representative
 - System Planning Impacts from Distributed Energy Resources Working Group (SPIDERWG)
 - Inverter Based Resource Performance Subcommittee (IRPS)
 - Energy Reliability Assessment Working Group (ERAWG)
 - Electric Gas Working Group (EGWG)
 - System Protection and Control Working Group (SPCWG)



#6 Review the Summary of Misoperations across the MRO Region

- Accomplished through the Protective Relay Subgroup (PRS)
 - *Misoperations Due to Human Errors*



Questions

Consent Agenda

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

Action

Vote

Report

The minutes will start on the next page.



MIDWEST RELIABILITY ORGANIZATION

CMEP Advisory Council Q2 Meeting

May 31, 2023

9:00 AM to 2:37 PM Central

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

OPEN

MRO Offices, St. Paul, MN / WebEx

May 31, 2023 9:00 AM

Notice for this meeting was electronically posted to the MRO website [here](#) on May 4, 2023. A final agenda, including advanced reading materials, was also posted on May 26, 2023.

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

MRO Compliance Monitoring and Enforcement Program Advisory Council (CMEPAC) Chair Terri Pyle called the meeting to order at 9:00 a.m. Central. Chair Pyle noted the meeting was being recorded, reminded attendees of the MRO Organization Group Guiding Principles, and the adherence to utilizing Robert's Rules of Order. Michelle Olson, CMEPAC staff support and Compliance Monitoring Administrator, 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, Pyle highlighted MRO's Standards of Conduct, Conflict of Interest, and Antitrust Guidelines and noted the video and audio recording and MRO Organizational Group Guiding Principles.

3 RRA Process and Volunteers

Mark Tiemeier, MRO Principal Technical Advisor

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Mark Tiemeier reviewed the RRA survey results presentation provided in the packet and solicited volunteers for the RRA Risk Ranking project. Terri Pyle, CMEPAC Chair, and Theresa Allard, CMEPAC Member, provided their experiences and insight to what volunteering for this project entails. Discussion ensued. Ashley Stringer, Oklahoma Gas & Electric and Troy Brumfield, American Transmission Company, volunteered as the two CMEPAC representatives for the 2024 Regional Risk Assessment process.

4 Requirement Specific RFI

*Bill Steiner, MRO Director of Risk Assessment and Mitigation
Terri Pyle, CMEPAC Advisory Council Chair*

Bill Steiner provided an overview of the Requirement Specific RFI project. Terri Pyle stated that both MRO and entities could benefit from this project. The template would include pre-determined questions or checklist of information that MRO RAM could use during the risk determination of PNCs, potentially reducing the processing time. Entities could benefit by knowing in advance the information that RAM may request during a PNC review and could even utilize pre-emptively in their compliance programs to strengthen their processes and evidence.. Volunteers for this effort include Council members Ashley Stringer, Oklahoma Gas and Electric, Troy Brumfield, American Transmission Company, Tiffany Lake, Evergy, Larry Heckert Alliant Energy, Kevin Lyons, Central Iowa Power Cooperative, and Terri Pyle, Oklahoma Gas and Electric, as well as non-Council members Angela Wheat, Southwest Power Administration, Paul Mehlhalf, Sunflower Electric Power Corporation, and Andrew Coffelt, Kansas City Board of Public Utilities. An additional solicitation for volunteers will occur during the June CMEPAC monthly call.

5 Charter Review

Terri Pyle, CMEPAC Advisory Council Chair

a. CMEPAC

The CMEPAC reviewed and provided comments for the CMEPAC Charter. There was confusion in the purpose language regarding providing guidance to the MRO Board of Directors. Clarification of this language is desired but a decision was made to retain the language. A link requires an update. Chair Pyle suggested that there be a meeting with the RAC and SAC leadership and liaisons to discuss the work plan tiebacks to the RRA and Strategic Plan and reviews each of the charters more closely. There was also discussion on the requirements of the MRO Regional Risk Process Manual review. MRO staff will confirm the date of the next required review. No vote occurred at this time.

b. NSRF

The CMEPAC reviewed the NSRF Charter. Discussion ensued. No vote occurred at this time.

6 EOP-012 Readiness Assessment Interest

Julie Sikes, MRO Compliance Monitoring Manager, O&P

Julie Sikes provided an overview of the Readiness Assessment process including a short discussion regarding the implementation of the Readiness Assessment for CIP-012 last year. Chair Pyle provided feedback to the Council regarding the value of the initiative to OG&E as a volunteer participant. Ms Sikes proposed another potential opportunity for a Readiness Assessment could be related to the Cold Weather Standard EOP-012. Brief discussion ensued regarding potential version of the Standard to focus on and potential timeline. Discussed the opportunity for Ms Sikes to present the idea at the June CMEPAC monthly call to further gauge interest.

Break – 10:30 a.m.

7 Outreach Content

Terri Pyle, CMEPAC Advisory Council Chair

a. New Enforceable Standards

Terri Pyle provided an overview of this initiative involving identifying standards where Standard Application Guides (SAGs) would be beneficial and requested for volunteers. Paul Mehlhaff, Sunflower Electric, and Alison Archer, Midwest Independent System Operator, volunteered for this opportunity. Carl Stelly, Southwest Power Pool, volunteered to lead the team to determine potential guidance and outreach opportunities, including SAGs. Ken Buruss, Midwest Energy, commented that

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the SAGs be written so that there are multiple ways to demonstrate compliance for the applicable standard. Jeff Norman further clarified that the intent of the SAGs are to provide “a” approach, not “the” approach.

b. Compliance Gaps on RRA

Terri Pyle and Tiffany Lake provided an overview of this effort, including identifying potential gaps in Reliability Standards that do not comprehensively address risk to the bulk electric system (BES), with a focus on risks that have been identified as part of the MRO Regional Risk Assessment. This work would be helpful for the RRA process and also identify potential outreach and guidance opportunities. Council members Ashley Stringer, Oklahoma Gas and Electric, Troy Brumfield, American Transmission Company, Tiffany Lake, Evergy, Larry Heckert Alliant Energy, and Terri Pyle, Oklahoma Gas and Electric, as well as non-Council members Angela Wheat, Southwest Power Administration, Paul Mehlhalf, Sunflower Electric Power Corporation.

8 Subteam Reports

CMEP Advisory Council Chair

a. Newsletter Subteam

Theresa Allard, CMEPAC Member

Theresa Allard provided an update on the upcoming newsletters. The first newsletter was submitted last week and will feature internal controls. She then provided potential topics for the second report

b. Monthly Call Subteam

Eric Ruskamp, CMEPAC Member

Eric Ruskamp, CMEPAC member, provided an oral update on the call information included in the agenda packet.

c. Webinar Subteam

Bryan Dixon, CMEPAC Member

Bryan Dixon, CMEPAC Member, provided an overview of the upcoming webinar on June 12, 2023 on the “Good Catch” program and requested potential topics be sent to him or his sub-team mates

d. Conference Subteam

Matt Caves, CMEPAC Member

Terri Pyle provided an update for the CMEP Conference Agenda and status. Cris Zimmerman asked for clarification on the Conference Topics. Discussion ensued. As this would be a detailed discussion, this discussion will be taken offline with the conference subteam.

e. Ask CMEPAC

Terri Pyle, CMEPAC Chair

Pyle provided an overview of the AskCMEPAC questions that were answered since the previous meeting of the CMEPAC held on February 21, 2023.

Lunch 12:00 p.m.

9 Standing Reports

a. NERC Standards Committee (NERC SC)

Troy Brumfield, NERC SC Member

Troy provided an overview of the NERC Standards Committee report provided in the agenda packet. Discussion ensued.

b. Facilities Ratings Task Force (FRTF)

Jon Radloff, FRTF CMEPAC Representative

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Jon Radloff provided an overview of the FRTF report provided in the agenda packet. Discussion ensued.

- c. NERC SupplyChain Task Force (SCTF)
Mark Zellner, SCTF Representative
There was no report at this time.
- d. Mid-Continent Compliance Forum (MCCF)
Mark Buchholz, CMEPAC and MCCF Member
Mark Buchholz provided an overview of the MCCF report provided in the packet. Discussion ensued.
- e. SPP Reliability Compliance Advisory Group (RCAG)
Mark Buchholz, CMEPAC and RCAG Member
Mark Buchholz provided an overview of the RCAG report provided in the packet. Discussion ensued.
- f. MRO NERC Standards Review Forum (NSRF)
George Brown, NSRF Chair
George Brown provided an overview of the NSRF report provided in the packet. Discussion ensued.
- g. NERC Compliance and Certification Committee (NERC CCC)
Cullum Marcussen, NERC CCC Member
Due to time constraints, this report was moved to later in the meeting. Erin Cullum provided an overview for the NERC CCC report provided in the agenda packet. Discussion ensued. There was discussion on the framework for addressing reliability risks and so https://www.nerc.com/comm/RISC/Related%20Files%20DL/Framework-Address%20Known-Emerging%20Reliability-Security%20Risks_ERRATTA_V1.pdf was provided in the chat.

10 OGOC Meeting Feedback

Tiffany Lake, CMEP Advisory Council Vice Chair

Tiffany Lake attended the Q1 OGOC meeting and provided an overview of the agenda and feedback. Potential topics for the OGOC Q3 risk discussion topic was discussed. Terri Pyle suggested that the topics be brought up to the council members to gather more feedback and comments they can bring to the risk discussion. Discussion ensued.

Break – 1:30 p.m.

11 Work Plan Updates

Terri Pyle, CMEP Advisory Council Chair

The CMEPAC discussed and updated the work plan. Chair Pyle discussed and solicited volunteers for the initiative to Review new/changing standards outreach opportunities including SAGs and Readiness Assessments. Volunteers include Council members Carl Stelly, Southwest Power Pool, and Alison Archer, MISO.

12 Action Item Review

Michelle Olson, CMEPAC Meeting Secretary

Olson reviewed the action items captured during the meeting. Pyle and Lake added a few additional items. These action items are compiled in a separate tab in the work plan for the CMEPAC members to review.

13 Other Business and Adjourn

Mark Buchholz announced that Mahmood Safi has accepted a new position with an entity outside of MRO's footprint and therefore has stepped off the council. The council took a few minutes to express gratitude towards Mahmood for his effort with MRO and the council.

**MEETING AGENDA – Compliance Monitoring Enforcement Program Advisory Council
(CMEPAC) – August 09, 2023**

Prepared by: Michelle Olson, Council Secretary, Compliance Monitoring Administrator
Reviewed and Submitted by: William Steiner, Director of Compliance Monitoring

Exhibit A – Meeting Attendees

| CMEP Advisory Council Members | |
|-------------------------------|--|
| Name | Organization |
| Alison Archer | MISO |
| Ashley Stringer OGE | Oklahoma Gas and Electric |
| Bryan Dixon | Xcel Energy |
| Carl Stelly | Southwest Power Pool |
| Eric Ruskamp | Lincoln Electric System |
| Larry Heckert | Alliant Energy |
| Kevin Lyons | Central Iowa Power Cooperative |
| Nazra Gladu | Manitoba Hydro |
| Terri Pyle | Oklahoma Gas and Electric |
| Theresa Allard | Minnkota Power Cooperative |
| Tiffany Lake | Evergy |
| Troy Brumfield | American Transmission Co. |
| MRO Staff | |
| Name | Title |
| Chris Pecore | Senior Compliance Engineer/Auditor, CIP |
| Cris Zimmerman | Manager of Outreach and Stakeholder Engagement |
| Dan Son | Systems Administrator |

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| Holly Haynes | Compliance Auditor, CIP |
|------------------|--|
| Jeff Norman | Director of Compliance Monitoring |
| Jess Syring | Compliance Monitoring Manager, CIP |
| Julie Sikes | Compliance Monitoring Manager, O&P |
| Kendra Buesgens | Compliance Monitoring Coordinator |
| Larry Johnson | Principal Compliance Engineer/Auditor, CIP |
| Lisa Stellmaker | Executive Administrator and Office Manager |
| Max Vang | IT Support Analyst |
| Michelle Olson | Compliance Monitoring Administrator |
| Sam Zewdie | Principal Compliance Engineer, O&P |
| Sara Smith | Enforcement Attorney |
| Shawn Keller | Outreach Coordinator |
| Steen Fjalstad | Director of Security |
| Tasha Ward | Director of Enforcement and External Affairs |
| William Steiner | Director of Risk Assessment and Mitigation |
| Guests | |
| Name | Organization |
| Alan Kloster | Evergy |
| Allie Gavin | ITC Holdings |
| Andrew Coffelt | Kansas City Board of Public Utilities |
| Angela Wheat | Southwestern Power Administration |
| Ashley Calderon | Board of Public Utilities |
| Blake Huddleston | ENGIE |
| Chris Watkins | Minnesota Department of Commerce |
| Courtney Vetter | Montana Dakota Utilities Company |

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| | |
|------------------|--|
| David Rudolph | Basin Electric Power Cooperative |
| Dillan Vigil | Golden Spread Electric Cooperative |
| Ellen Watkins | Sunflower Electric Power Corporation |
| Erin Cullum | Southwest Power Pool |
| fred meyer | Algonquin Power & Utilities Corp. |
| Gail Elliott | ITC Holdings |
| George Brown | Pattern Energy |
| Hillary Creurer | Minnesota Power |
| Jamison Cawley | Nebraska Public Power District |
| Jon Radloff | American Transmission Company |
| Ken Burruss | Midwest Energy, Inc. |
| Marcus Sabo | ITC Holdings |
| Mark Zellner | Southwest Power Pool |
| Mary Agnes Nimis | Federal Energy Regulatory Commission |
| Maurice Moss | Board of Public Utilities Kansas City KS |
| Mayfield, Ash | Grand River Dam Authority |
| Nikki Dacus | Western Farmers Electric Cooperative |
| Paul Mehlhaff | Sunflower Electric Power Corporation |
| Peg Abbadini | Volkman Consulting |
| Sara Orr | Golden Spread Electric Cooperative |
| Stephen McGie | Kansas City BPU |
| Tina Adams | Western Farmers Electric Cooperative |
| Tracey Stewart | Southwestern Power Administration |

Consent Agenda

b. 2024 CMEPAC Meeting Dates
Terri Pyle, CMEP Advisory Council Chair

Action

Discussion and Vote

Report

| | Q1 2024 | Q2 2024 | Q3 2024 | Q4 2024 |
|--------|----------------------|-----------------|-----------------|------------------|
| CMEPAC | 2/20/2024 Virtual | 5/7/2024 Hybrid | 8/7/2024 Hybrid | 10/9/2024 Hybrid |

MRO CMEP Conference: Hybrid Offsite **July 23-24, 2024 in Kansas City**

Charter Review and Approval

- a. Compliance Monitoring and Enforcement Program Advisory Council
Terri Pyle, CMEP Advisory Council Chair

Action

Review and vote to recommend the CMEPAC charter to the OGOC for approval.

Report

The charter will begin on the next page.



MRO Compliance Monitoring and Enforcement Program Advisory Council Charter

1. Purpose

The MRO Compliance Monitoring and Enforcement Program Advisory Council (MRO CMEPAC) is a MRO Organizational Group that provides advice and counsel to MRO's Board of Directors (board), the board's Organizational Group Oversight Committee (OGOC), 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 CMEPAC increases outreach and awareness in these key areas.

2. Membership

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 Council may be an employee of a single entity or affiliated entities. At least three sectors will be represented on the Council. To the extent practicable, membership will reflect geographic diversity and balanced sector representation. MRO staff will solicit volunteers from MRO Members.

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.

The MRO CMEPAC is comprised of 15 members. All Advisory Council members will have a three year term. Nominations for open positions on the MRO CMEPAC will be submitted to the MRO CMEPAC for review. The MRO CMEPAC, with input from MRO staff, will recommend the candidate(s) best suited for the open position(s) based on experience, expertise and geographic diversity to the board's OGOC, which will appoint the members of the MRO CMEPAC.

The MRO CMEPAC will annually elect its chair and vice chair pursuant to the process and terms outlined in Policy and Procedure 3

3. Key Objectives and Responsibilities

Key objectives and responsibilities of the MRO CMEPAC include:

- Annually develop a work plan in coordination with MRO staff to support the MRO Strategic Plan and Metrics for approval by the OGOC and report performance progress.
- 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.

Approved by the MRO OGOC: September 13, 2023, Effective by January 1, 2024



- 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.
- Recommend the establishment of subgroups to support the CMEPAC work plan as appropriate. Oversee and provide direction to any subgroups.
- 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 feedback to MRO staff on CMEP activities.
- Conduct outreach and awareness to promote compliance:
 - Provide non-binding MRO Standard Application Guides (SAGs) to assist stakeholders in understanding NERC Reliability Standards and approaches to meet requirements.
 - Consider noncompliance data provided by MRO staff to determine if there are opportunities for additional outreach and awareness.
 - Facilitate and lead the design of the Annual MRO CMEP Workshop by identifying topics and speakers. Present at the workshop as appropriate.
 - Support Midwest Reliability Matters by suggesting topics and/or writing articles.
 - Share best practices and other pertinent information.
 - 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.
- Recommend individuals to represent MRO as representatives on NERC organizational groups to the OGOC.
- Provide guidance and communicate expectations to MRO NERC representatives, receive reports from the MRO NERC representatives, and disseminate the information as directed by the OGOC.
- Support the applicable NERC program areas.
- Annually review the charter and propose changes as needed to the OGOC.

4. 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](#).

Approved by the MRO OGOC: September 13, 2023, Effective by January 1, 2024



5. Costs

Meeting costs incurred by MRO CMEPAC members are reimbursable by MRO according to [Policy and Procedure 2–Expense Reimbursement](#).

6. Reporting Requirements

The chair or vice chair of the MRO CMEPAC will provide a report to the OGOC during the fourth quarter meeting of the OGOC reviewing past accomplishments and highlighting work for the coming year. During the other quarterly meetings of the OGOC, the chair, vice chair, or other designee of the MRO CMEPAC will provide a written or oral report to the OGOC.

Approved by the MRO OGOC: September 13, 2023, Effective by January 1, 2024

Charter Review and Approval

b. NERC Standards Review Forum
Terri Pyle, CMEP Advisory Council Chair

Action

Review and vote to recommend the CMEPAC charter to the OGOC for approval.

Report

The charter will begin on the next page.



MRO NERC Standards Review Forum Charter

Style Definition: Heading 2

1. Purpose

Deleted: January 1, 2023

The MRO NERC Standards Review Forum (NSRF) is a MRO Compliance Monitoring and Enforcement Program Advisory Council (CMEPAC) subgroup that provides a venue for reviewing and providing NSRF agreed upon comments to NERC Standards Drafting Teams during the NERC Reliability Standards development process and to NERC on other draft policies or processes as directed by the MRO CMEPAC.

2. Membership

Pursuant to MRO's [Policy and Procedure 3: Establishment, Responsibilities, and Procedures of Organizational Groups and MRO Sponsored Representatives on NERC Organizational Groups](#) (MRO Policy and Procedure 3), the CMEPAC shall recommend NSRF members based upon experience, expertise and geographic diversity to the board's Organizational Group Oversight Committee (OGOC) for approval. There will be up to twenty-one NSRF members with three seats reserved for each sector. Seats may not be filled from outside the sector designated for a given seat. The NSRF will recommend members to the CMEPAC. Each sector shall have one vote regarding standards. For all other voting matters before the NSRF, each NSRF member shall have one vote. Submissions to NERC from the NSRF should represent the best interest for all MRO members.

The NSRF will annually elect its chair and vice chair pursuant to the process and terms listed in Policy and Procedure 3.

3. Key Objectives and Responsibilities

Key objectives and responsibilities of the NSRF include:

- Provide a forum for discussion and regional collaboration of comments to be submitted during the development of NERC Standards including: Standards Authorization Requests (SARs); proposed, new, or modified NERC Reliability Standards; Interpretations of existing NERC Reliability Standards; and other draft policies and procedures, etc.
- Identify a point of contact for each NERC project to leverage their technical knowledge during the commenting period of NERC Reliability Standards under development. To satisfy NSRF forum participants, if the NSRF does not have a consensus concerning a comment, the comment will be written again, or dropped completely. (Please note that any person or group may independently submit a comment form for any NERC Reliability Standard under development.)
- Establish a forum for discussion and collaboration on the development of voting recommendations for NERC ballots.
- Include MRO members with relevant experience in the electric utility industry.
- Hold weekly NSRF calls that are open to all stakeholders regardless of their geographic location.
- Work in conjunction with MRO to solicit volunteers from the stakeholder community to serve as participants on subject matter expert teams.

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Approved by the MRO OGOC: September 13, 2023, Effective by January 1, 2024



4. Meetings

The NSRF will meet weekly or as necessary, typically via conference call or web meeting. Meetings of the NSRF are open to public attendance. One-third of the members of NSRF will constitute a quorum. A quorum is not required for a general discussion amongst NSRF Members and participants during meetings. The chair or vice chair will preside over the NSRF meeting and determine whether there is a consensus among the participants to file comments and ballot recommendation on behalf of the NSRF. Any NSRF member may make a motion to object to filing comments, which shall carry if approved by a simple majority of NSRF sectors. Additional meeting requirements related to the rules of conduct can be located in MRO Policy and Procedure 3.

The chair, vice chair, or meeting secretary of the NSRF will forward draft meeting minutes to the NSRF members and observers, summarizing the conference call highlights, including comment forms and voting recommendations.

5. Reporting Requirements

The NSRF chair or vice chair will provide a written and/or oral report quarterly describing the activities and actions of the NSRF to the CMEPAC. Annually, the NSRF shall perform a review of this charter and recommend any changes to it to the CMEPAC for approval by the OGOC. The CMEPAC shall provide a summary report, including a statement of its conclusions, to the MRO Board of Directors at the annual meeting.

Deleted: 2

Approved by the MRO OGOC: ~~September 13, 2023~~, Effective by January 1, 2024

Annual CMEP Conference CIP Highlights

Terri Pyle, CMEPAC Chair

Action

Discussion

Report

Chair Pyle will lead this discussion during the meeting.

Standing Reports

- a. Project Management and Oversight Subcommittee (PMOS)
Terri Pyle, CMEPAC Chair

Action

Information

Report

This report will begin on the next page.

MEETING AGENDA – Compliance Monitoring Enforcement Program Advisory Council (CMEPAC) – August 09, 2023

NERC SC Project Management and Oversight Subcommittee (PMOS) Update

Terri Pyle

August 1, 2023

Background

- The PMOS is focused on monitoring Standards Development projects and reporting to the NERC Standards Committee (SC).
- This subcommittee assigns at least one PMOS member, as a liaison, to each active [Reliability Standard Under Development](#) project.
- Each PMOS Liaison works cooperatively with the project's NERC standards developer to help ensure schedules are achieved, to identify and assist in any drafting team process issues, and to ensure all drafting team members regularly attend meetings/calls and actively participate.

The number of open projects continues to increase resulting in discussions regarding ability for industry to staff the SDTs and have the bandwidth to be engaged in the Standard Development process.

PMOS Meeting, July 18, 2023

- PMOS Scope document revisions to be discussed with SC Chair and Director of Standards Development
- New PMOS membership review and approve
- Provided status updates for the 22 current open NERC Projects
- Discussion: The number of open projects continues to increase resulting in discussions regarding ability for industry to staff the SDTs and have the bandwidth to be engaged in the Standard Development process. NERC Staff is also aware and discussions are underway regarding a prioritization process.

Project Tracking Spreadsheet

| | | | |
|---|--|-------------------------------------|--------------------------------|
| NERC NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION | | Updated: 7/14/2023 | |
| HOME | | DO NOT SORT (Filtering Ok) | Baseline / Complexity |
| List of Approved Projects (Filter) | | Early/(Late) | Factor / Status |
| | | Days (Filter) | (Filter) |
| 2016-02d - Modifications to CIP Standards | | Address all remaining V5TAG issues: | -869 Working to Initial Ballot |
| 2017-01b - Modifications to BAL-003-1.1 | | BAL-003-3 | SAR / PR / WP |
| 2019-04 - Modifications to PRC-005-6 | | PRC-005 | 1057 SAR / PR / WP |
| 2020-02 - Modifications to PRC-024 (Generator Ride-through) | | PRC-024 | -142 SDT Development |
| 2020-04 - Modifications to CIP-012-1 | | CIP-012-2 | -630 SDT Development |
| 2021-01 - Modifications to MOD-025 and PRC-019 | | PRC-019, MOD-025 | -17 Responding to Comment |
| 2021-02 - Modifications to VAR-002-4.1 | | TBD | 157 SDT Development |
| 2021-03 - CIP-002 Transmission Owner Control Centers (TOCC) | | TBD | -771 SDT Development |
| 2021-04b - Modifications to PRC-002-2 | | PRC-002-5 | -425 Working to Initial Ballot |
| 2021-06 - Modifications to IRO-010 and TOP-003 | | TBD | 27 SDT Development |
| 2021-07b - Extreme Cold Weather Grid Operations, Preparedness, and Coordination | | TBD | 90 SDT Development |
| 2021-08 - Modifications to FAC-008-5 | | FAC-008-6 | SDT Development |
| 2022-01 - Reporting ACE Definition and Associated Terms | | TBD | 55 SDT Development |
| 2022-02 - Modifications to TPL-001-5.1 and MOD-032-1 | | TBD | -172 SDT Development |
| 2022-03 - Energy Assurance with Energy-Constrained Resources | | TBD | 189 Nominations & SAR |
| 2022-04 - EMT Models in NERC MOD, TPL, and FAC Standards | | TBD | 352 Nominations & SAR |
| 2022-05 - Modifications to CIP-008 Reporting Threshold | | CIP-008 | 141 SAR / PR / WP |
| 2023-01 - EOP-004 IBR Event Reporting | | EOP-004-5 | Nominations & SAR |
| 2023-02 - Performance of IBRs Standard Authorization Request | | PRC-004-7 | Nominations & SAR |
| 2023-03 - Internal Network Security Monitoring (INSM) | | TBD | Nominations & SAR |
| 2023-04 - Modifications to CIP-003 | | TBD | Nominations & SAR |
| 2023-05 - Modifications to FAC-001 and FAC-002 | | TBD | Nominations & SAR |

Standing Reports

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

Action

Information

Report

FRTF Roster: <https://www.nerc.com/comm/RSTC/FRTF/FRTF%20Roster.pdf>

The current version of the FRTF has had full team meetings on the following dates:

- July 18, 2022
- September 12, 2022
- February 24, 2023
- April 28, 2023
- July 14, 2023

A **work plan** was developed by select FRTF team members in December 2022. The work plan includes the following items (leads also listed):

- Work Plan Item 1 – Reliability Guideline - Sustaining Accurate Facility Ratings
 - Co-Leads: Robert Reinmueller and Brian Evans-Mongeon
- Work Plan Item 2 - Support Project 2021-08 Modifications to FAC-008 SDT
 - Co-Leads: Dre Pliodzinskas & Jeremy Harris
- Work Plan Item 3 - Whitepaper on Sampling for Facility Rating programs
 - Co-Leads: Jennifer Flandermeyer & John Stephens

Sub-teams have been meeting since the 2/24/2023 full team meeting to work on the 2023 work plan items.

The **February 24, 2023** full team meeting was focused on rolling out the 2023 work plan to the full team with discussion of each item. Highlights:

- Work Plan Item 1 – Reliability Guideline - Sustaining Accurate Facility Ratings
 - Provide clarity on NERC concerns:
 - Lack of awareness
 - Inadequate asset and data management
 - Inadequate change management
 - Inconsistent development and application of facility ratings methodologies
 - To be a helpful guide, not “how to be compliant”
- Work Plan Item 2 - Support Project 2021-08 Modifications to FAC-008 SDT
 - Help provide clarification, including definitions/terminology, for FAC-008 and the SDT
 - An update from the SDT was provided
- Work Plan Item 3 - Whitepaper on Sampling for Facility Rating programs
 - Focus is on developing an efficient and effective risk-based approach to verifying ratings through sampling, as part of a sound ratings program

Highlights from the **April 28, 2023** full team meeting:

- FRTF full team meetings will be June-August-October-December
- 2023 work plan updates:
 - Work Plan Item 1 – Reliability Guideline - Sustaining Accurate Facility Ratings
 - Progress includes agreement on implementation guideline, practical examples, requirements as described today, assignments and drafting based on MRO Application Guide
 - Structure of document to include “why” and “what not to do”
 - Document ideally will contain “what” and “how” and known potential errors or shortcomings
 - OK for this sub-team to give input on ERO practice guide
 - Work Plan Item 2 - Support Project 2021-08 Modifications to FAC-008 SDT
 - Discussed key terms: Facility, Element, Equipment Rating, Facility Rating
 - Shared diagrams to help illustrate the following: Line Facility, Transformer Facility, Generator Interconnect / Jointly Owned Facility
 - Work Plan Item 3 - Whitepaper on Sampling for Facility Rating programs
 - Draft white paper outline: intro, purpose, types of sampling and why, parameters which impact ratings / risk factors, how to assess risk – methods, range of reasonableness / robustness for your program

Highlights from the **July 14, 2023** full team meeting:

- 2023 work plan updates (reminder: Q1 2024 deadline for all sub-teams):
 - Work Plan Item 1 – Reliability Guideline - Sustaining Accurate Facility Ratings
 - Compiling a document based on MRO best practices document; includes filling gaps, highlighting new items, clarifications, addressing old/irrelevant items
 - Slightly behind schedule - first draft not done yet
 - Work Plan Item 2 - Support Project 2021-08 Modifications to FAC-008 SDT
 - Terminology document to be provided to FAC-008 SDT (clarification on key terms like facility, equipment, element, SOL, etc.)
 - Discussing scope of SAR and the right regulatory tool to incorporate terminology clarifications (e.g. reliability guideline, technical reference document, etc.)
 - Also discussing concepts like capitalizing words like Facility and Equipment (and what that means) and where facilities begin and end.
 - Work Plan Item 3 - Whitepaper on Sampling for Facility Rating programs
 - Reminder: This is for TO QC to help ensure accurate ratings, not for auditor sampling
 - On track for end August rough draft
 - 5 sections of document are being worked on separately (Intro, Parameters which impact facility ratings, Assessing risk, Methods for verifying ratings, and Creating a FR program inclusive of verification activities)
- Future full team meetings:
 - September 15, 2023 | 1:00 - 3:00 p.m. Eastern
 - November 17, 2023 | 1:00 - 3:00 p.m. Eastern

Standing Reports

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

Action

Information

Report

Terri Pyle will lead this discussion during the meeting.

Standing Reports

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

Action

Information

Report

This report will begin on the next page.

CCC Meeting Report

The CCC met on July 20, 2023 at the MRO offices in St. Paul, MN.

Richard Burt reviewed the ERO Reliability Risk Matrix. He noted that the Risk Matrix was developed by MRO and refined with ERO feedback. The Risk Matrix aligns with the Risk Prioritization step of the ERO Risk Framework. It is intended to assess operational and security risks similarly.

The Consistency Reporting Tool Task Force Scope was presented and was approved. This issue was previously discussed during the 2023 Q1 focused discussion session at CCC and the scope was presented in Q2.

Subcommittee Reports

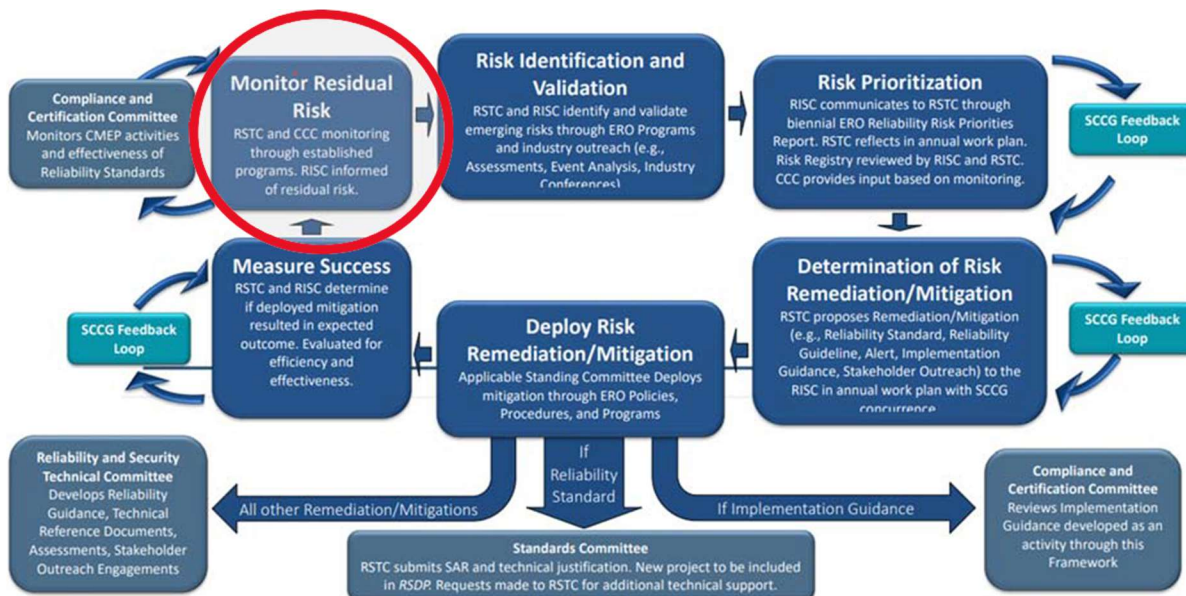
The Nominating Subcommittee met on Tuesday ahead of the CCC meeting. This is a slate year, which means that the nominating subcommittee will be developing a slate for leadership. In addition, there were 21 nominations for the most recent opening of 10 open CCC Sector Representative seats. The selections will be put forward at the December NERC Board meeting for approval. It was also noted that clarifications will be made around the nomination form for the Sector 12 form for governmental entities. Updates are needed to onboarding and training materials as well as to the public forward facing website

Brief reports were provided from all subcommittees. There were no voting items.

Q3 Focused Discussions

1. Measuring Residual Risk

The Q3 2023 discussion was intended to sharpen the CCC's focus on the specific area of the Framework to Address Known and Emerging Reliability and Security Risks that the CCC has been asked to develop further, measuring residual risk (circled below).



This topic was a continuation from the second quarter CCC meeting. Discussion was held and each sector was called upon to provide feedback. Representatives from the various sectors shared comments. There were many common themes during the discussion including the desire to understand what the implementation will look like in COPs and audits, as well as a desire for transparency in implementation. It was also noted that since not all entities carry the same inherent risk that measuring the residual risk may look different based on the entity's size or registration.

2. Self-Logging

James McGrane (NERC) and Tasha Ward (MRO) led a discussion on self-logging and discussion was held. Comments from representatives were received. It was noted that the intended benefits from the self-logging program have not fully been realized. With Align is in place, NERC is interested in entity feedback on benefits. One individual said that it has been more burdensome in Align to make self reports and believes there would be a lot of value in self-logging. Another comment was that the feedback received from peers has been split—some felt like there was a decrease in benefit and some felt like it was the same amount of work as a traditional self-report. It was noted by one representative that based on feedback from their sector that there appear to be regional differences between the REs, with some promoting the program more than others. There is overall interest from participants in continuing self-logging, and belief there can be benefits. There were also some positives noted. One entity explained that being able to self-log and then having issues disposed of as self-logged items is helpful in communicating to senior leadership about the strength of that entity's program and internal assessment of risk.

The next CCC meeting is October 10-12, 2023 in Phoenix, AZ at APS.

Standing Reports

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

Action

Information

Report

This report will be provided orally and inserted at a later date.

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

I. General

- NSRF Membership: 17/21
 - Cooperative: 3/3
 - Canadian Utility: 2/3
 - Federal Power Marketing Agency: 2/3
 - Generator and Power Marketer: 2/3
 - Investor Owned Utility: 2/3
 - Municipal Utility: 3/3
 - Transmission System Operator: 3/3

➤ **Year to Date:**

- NSRF Meeting Held: 28/29 possible.
- NSRF Member & Guest Meeting Attendance, average per week: 87
- NSRF Member Attendance, average per week: 71%

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.

➤ **Year to Date:**

- NERC Standard Projects, SARs, NOPRs, et cetera Reviewed, on average per week: 3
- Total NSRF Comments Submitted: 25
- Total NSRF Voting Recommendations Made: 80

➤ **Activity Since Last Report:**

- Standard Processes Manual Revisions to Address SPSEG Recommendations – Draft 2
Comments Submitted & Ballot Recommendation Provided
- Project 2017-01 - Modifications to BAL-003 Phase II | Draft 2
Comments Submitted & Ballot Recommendation Provided

- Project 2021-01 Modifications to MOD-025 and PRC-019 | Draft 2
Comments Submitted & Ballot Recommendation Provided
- Project 2021-06 – Modifications to IRO-010 and TOP-003 | Draft 2
Comments Submitted & Ballot Recommendation Provided
- Project 2021-02 – Modifications to VAR-002-4.1 | Draft 2
Comments Submitted & Ballot Recommendation Provided
- Project 2022-02 Modifications to TPL-001 and MOD-032 | Draft 1
Comments Submitted & Ballot Recommendation Provided
- Project 2021-03 CIP-002 Project 2021-03 CIP-002 informal comments
requested on Transmission Owner Control Centers
Comments Submitted
- SAR EOP-004 | Reporting of Aggregate loss of DER during Grid Disturbances
Comments Submitted
- SAR EOP-005 | Inclusion of DER in Blackstart Plans
Comments Submitted
- Project 2021-07 – Extreme Cold Weather Grid Operations, Preparedness, and
Coordination - Phase 2 | Draft 1 - EOP-012-2
Comments Submitted & Ballot Recommendation Provided
- Project 2020-06 Verifications of Models and Data for Generators | Draft 3 –
MOD-026-2
Comments Submitted & Ballot Recommendation Provided
- Project 2019-04 Modifications to PRC-005-6 | Draft 1
Comments Submitted & Ballot Recommendation Provided

III. Emerging Challenges, Risks & Opportunities

- None

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

- None

V. Other

- None

Standing Reports

- f. 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 July 19, 2023, via WebEx. Meeting centered around finalization of numerous items for the MCCF Summer Workshop scheduled for July 27, 2023, at the St. Paul Hotel and future opportunities for collaboration between the MCCF and the MRO CMEPAC.

The next MCCF Board of Director's Meeting is tentatively scheduled for August 16, 2023, via WebEx.

Standing Reports

- g. 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 June 12, 2023, via WebEx. Meeting minutes are available on the SPP.org website. Topics from RCAG meetings since the last report included: FERC Order 881 Compliance Filing; Zonal Planning Criteria, Multi-Day Reliability Assessments; Congestion Management; High Priority Study Modifications; RFIs to SPP Members – Compliance Contacts Update; NERC Open Projects updates for BAL-003, IRO-010, TOP-003, EOP-011, and EOP-012.

Regional Risk Assessment Update
Mark Tiemeier, MRO Principal Technical Advisor

Action

Mark Tiemeier will present and lead this discussion during the meeting. The slides will begin on the next page.

Report

The presentation will begin on the next page.



MIDWEST
RELIABILITY
ORGANIZATION

MRO 2024 Regional Risk Assessment

Mark Tiemeier

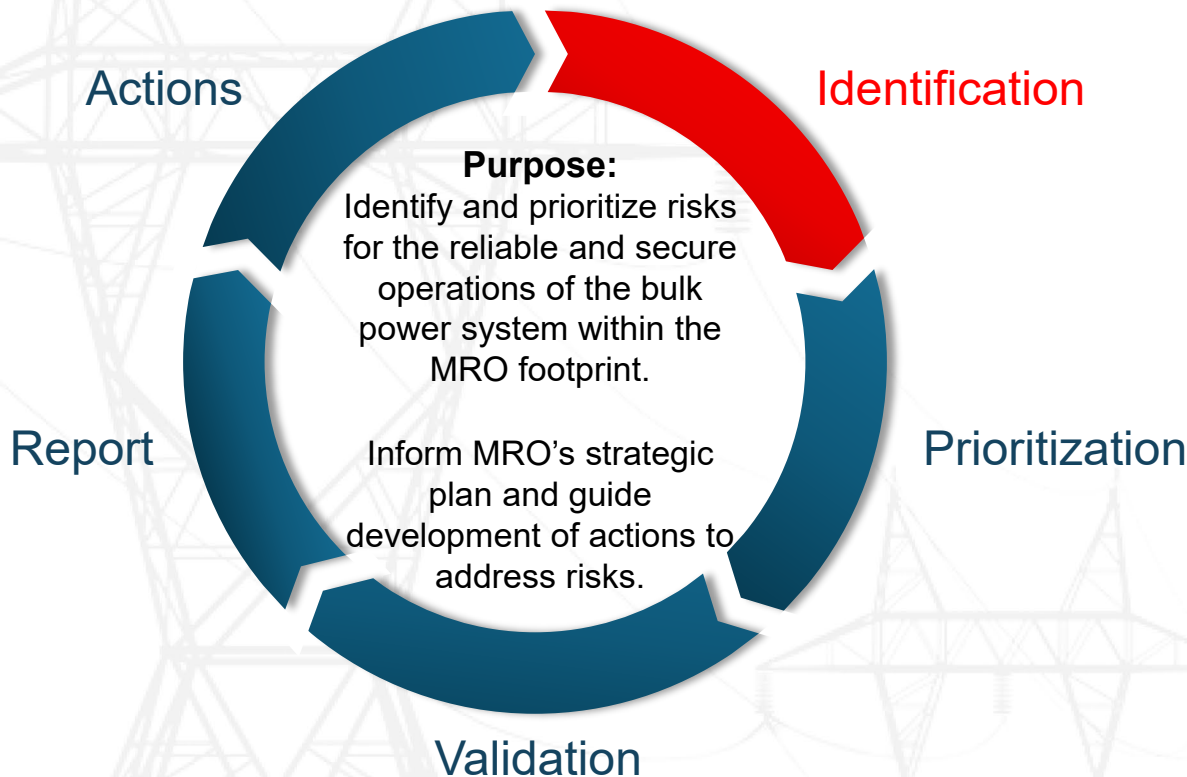
Principal Technical Advisor

CLARITY

ASSURANCE

RESULTS

Regional Risk Assessment Process



CLARITY

ASSURANCE

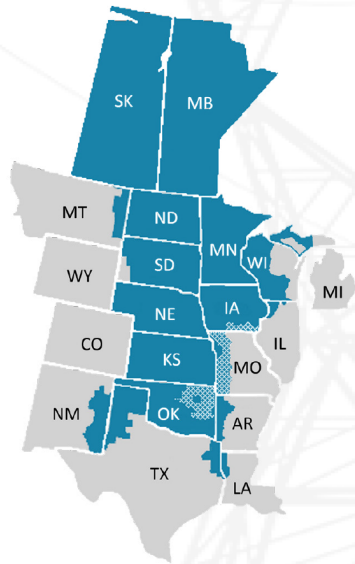
RESULTS



MRO 2023 Regional Risk Assessment

Top risks to the reliable and secure operation of the North American bulk power system in MRO's regional footprint.

Territory



About Us

As part of the [ERO Enterprise](#), MRO is committed to a shared mission to identify, prioritize and assure effective and efficient mitigation of risks to the reliability and security of the North American bulk power system in its regional footprint.

Read more at www.MRO.net.

MRO Reliability Risk Matrix: Risk Rankings

| Consequence / Impact (C) | | Likelihood (L) | | | | |
|--------------------------|------------|----------------|----------|----------------|----------|----------------|
| | | L1 | L2 | L3 | L4 | L5 |
| | | Very Unlikely | Unlikely | Possible | Likely | Almost Certain |
| C5 | Severe | | | | | |
| C4 | Major | | | | 4,5,6,16 | |
| C3 | Moderate | | 2 | 9,12,13 | 1 | |
| C2 | Minor | | | 3,7,8,10,14,17 | 15 | |
| C1 | Negligible | | | 11 | | |

Top risks are reflected in orange above and described below. A full list of risks assessed can be found in the final report.

Assessment Overview

- Extreme weather, consumer demand, and changes in technology and generation resources continue to present a rapidly increasing number of challenges to grid planners and operators. Physical and cyber security risks also continue to evolve at an unprecedented pace.
- MRO's annual *Regional Risk Assessment* considers continent-wide risks to reliability and security of the North American bulk power system and determines which are more likely to occur and would have a higher impact in MRO's region.
- This report is focused on risk identification, prioritization and mitigation and highlights for industry the priorities needed to collaboratively address these challenges. It also serves to inform key decision makers of challenges the industry faces and the policies and regulations that will help define a variety of proposed solutions.
- READ MRO'S [2023 REGIONAL RISK ASSESSMENT](#)

Key Findings: Top Reliability and Security Risks in MRO's Territory

| Model Assumptions | Planning Reserves | Energy Reliability | Generation Unavailability | Transmission Line Ratings | Insider Threats | Malware/Ransomware | Supply Chain Compromise |
|--|--|---|--|--|--|--|--|
| | | | | | | | |
| RISK 1. Assumptions used in bulk power models to plan and operate the grid have not accounted for the rapid increase in inverter-based and distributed energy resources, challenging industry's ability to accurately assess current and future system characteristics. | RISK 4. Traditional methods to calculate Planning Reserve Margin are inadequate to properly plan for the generation capacity needed to meet increasingly uncertain system operations, especially during extreme weather events. | RISK 5. Increased uncertainty from changing energy supply and customer demand challenge the grid's ability to meet load for all hours of the year. There is no comprehensive planning that assesses assurance of available energy and fuel sources over all time periods to maintain grid reliability. | RISK 6. Generation availability assumed during cold weather, particularly in the southern U.S., has been shown to be unrealistically high due to a lack of generation winterization and natural gas curtailments. | RISK 12. Use of constant overhead transmission line ratings year-round (non-seasonal) limits available transmission capacity and leads to inefficient real-time decisions when system conditions deviate from assumptions that drive rating calculations, such as cooler temperatures or during emergency operations. | RISK 9. Employees or contractors using their knowledge and authorized access of critical systems to do harm to the bulk power system is a continued, substantial threat to organizations and the reliability of the grid. | RISK 13. Phishing attacks can introduce malware or ransomware to corporate IT systems, which can impact critical systems necessary for reliable bulk power system operations through direct or in-direct connections those systems have to IT networks. | RISK 16. A cyber security event carried out through the vendor supply chain can broadly impact bulk power system reliability, especially where the vendor is a market leader providing systems used for system operation. |



CLARITY

ASSURANCE

RESULTS

2024 RRA Risk Ranking Meetings

- **Risk Information Sessions**

- *Tuesday, 10/17 2-4:30pm (Ops/Planning risks)*
- *Wednesday, 10/18 2-4:30pm (Security risks)*
- Open to all council members

- **Risk Ranking Workshop**

- *Monday, 10/23 8:30am-3:30pm*
- Only council risk ranking volunteers



MRO 2024 RRA Draft Risk Identification

- **Insufficient Bulk Power System Modeling**
 - Models used to operate and plan the bulk power system do not sufficiently represent growing levels of inverter-based resources and distributed energy resources to accurately assess the impact of system reliability from these resources
- **Inadequate Energy Availability**
 - Combines *Conservative Practices to Calculate PRM and Energy Reliability Planning* risks from 2023
 - Lack of dispatchable resources and variable resources to meet load obligations resulting in load shed



MRO 2024 RRA Draft Risk Identification

- **Generation Unavailability During Extreme Cold Weather**
 - Widespread cold weather, especially in the Southern MRO footprint, leading to significant generator outages
- **Use of Inaccurate Transmission Line Ratings**
 - System operators using inaccurate line ratings (incorrect equipment parameters or not appropriate for weather conditions) leading to decisions that hurt bulk power system reliability
 - Broader coverage than 2023 which focused only on lack of use of seasonal/emergency ratings



MRO 2024 RRA Draft Risk Identification

● Changing Sources of Reactive Power

- Retirement of large, centralized power plants being replaced by smaller, more distributed plants changes the location and capability to produce reactive power and the system needs for reactive power. If replacement sources of reactive power are not properly planned for, the bulk power system could have a deficiency affecting operational reliability.

● Inadequate IBR Ride-Through Capability

- Electrical fault causes a significant number of IBRs in an area to come offline and no longer be available to generate in to the system



MRO 2024 RRA Draft Risk Identification

- **Material and Equipment Availability**
 - Challenges in the supply chain coupled with widespread damage from a severe weather event challenge the transmission grid leading to controlled load shed
- **Misoperations Due to Human Errors**
 - Protection misoperation of transmission facilities due to human error leading to a significant outage within an area



MRO 2024 RRA Draft Risk Identification

- **Tight Supply of Expert Labor**
 - Insufficient number of trained staff to maintain reliable operation of the bulk power system and adapt to the rapidly evolving changes in the system



MRO 2024 RRA Draft Risk Identification

- **MRO SAC conducts an annual Regional Security Risk Assessment (RSRA) to identify security risks**
 - MRO's RSRA is an input to MRO's Regional Risk Assessment (RRA)
- **Security risks from the RSRA with an impact to bulk power system reliability will be included in the RRA**



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Questions

Subteam Reports

- a. Conference Subteam
Matt Caves, CMEPAC Member

Action

Information

Report

The annual MRO CMEP Conference took place on Wednesday, July 26, 2023. Recordings have been posted on MRO's public website on the [event page](#).

Subteam Reports

b. Monthly Calls Subteam
Eric Ruskamp, CMEPAC Member

Action

Information

Report

The CMEP AC continues to host their monthly compliance calls on the second Tuesday of the month 3:00 - 4:00 PM. The one-hour call typically includes around 60 participants. Topics from the previous quarter included a MRO presentation focusing on general updates to Align, Self-Logging and the MRO Preliminary Review Worksheets; a NERC presentation on the CIP-014 report; and a SPP and MISO joint presentation on FERC Order 881. The next monthly call will be held on August 8th, its topic is a review and discussion of the topics discussed at the July 26th MRO CMEP Conference. Facilitators for the four remaining months of the year have been arranged, however topics have not yet been finalized.

CMEPAC Monthly Call Metrics

| Month | Attendees | Average Duration of Attendees |
|---------------|-----------|-------------------------------|
| January 2023 | 66 | 56 Minutes |
| February 2023 | 56 | 38 Minutes |
| March 2023 | 61 | 61 Minutes |
| April 2023 | 52 | 36 Minutes |
| May 2023 | 62 | 48 Minutes |
| June | 68 | 60 Minutes |
| July | 66 | 60 Minutes |
| August | 65 | 40 Minutes |

Currently there are 177 registered for the monthly calls.

Subteam Reports

c. Webinars Subteam

Bryan Dixon, CMEPAC Member

Action

Information

Report

The Q2 CMEPAC Good Catch Webinar was hosted on June 12th and received positive feedback from the industry, thank you for the participation. Mark your calendars for the upcoming CEMPAC Webinar on August 15! The event, organized by the CEMPAC Webinar team, will cover the upcoming EOP-012-1 Readiness Assessment.

Subteam Reports

d. Newsletter Subteam

Theresa Allard, CMEPAC Member

Action

Information

Report

Article 1: One Entity's Internal Controls Program - Published June 8, 2023

Article 2: Manitoba Hydro's Compliance Oversight Review Initiative Contributes to Reliability Excellence – submitted to the MRO on 7/5/23.

The CMEPAC Newsletter Subteam meets quarterly via Teams and via email as needed. We are currently preparing to prepare and submit our 3rd newsletter article.

Subteam Reports

e. Ask CMEPAC

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.

RRA and Associated Standards Assessment

Bill Steiner, MRO Director of Risk Assessment and Mitigation

Terri Pyle, CMEPAC Chair

Action

Information

Report

Bill Steiner and Terri Pyle will present this information during the meeting. The reports will begin on the next page.

2023 MRO CMEP AC Initiative

Requirement Specific RFIs (CIP-007 R2, FAC-008 R6)

Purpose: Develop requirement specific RFIs for use by RAM and industry to streamline the RAM review process and provide insight to industry of documentation needed to demonstrate compliance.

Proposed Plan:

1. Kick-off Discussion and Overview of Purpose
2. Break up into two separate groups. Develop checklist/RFI individually for CIP-007 R2 and FAC-008 R6
Considerations (build this out):
 - a. Consider review of RSAW Compliance Assessment Approach as initial guideline? Do not need to duplicate this.
 - b. Consider scope of noncompliance – Circumstances? How was it identified?
 - c. Any existing controls?
3. Review draft RFIs with larger Project Team
4. Develop Overarching process (including approval/formalization) and guidelines for how it is used (and not used)
5. Full group review

**MEETING AGENDA – Compliance Monitoring Enforcement Program Advisory Council
(CMEPAC) – August 09, 2023**

Project Team

| Name | Company | RFI |
|-----------------|----------------|-------------------------|
| David Gladberry | MRO | MRO Support; FAC-008 R6 |
| Ashley Stringer | OG&E | FAC-008 R6 |
| Troy Brumfield | ATC | FAC-008 R6 |
| Larry Heckert | Alliant | FAC-008 R6 |
| Kevin Lyons | CIPCO | FAC-008 R6 |
| Terry Harbour | MidAmerican | FAC-008 R6 |
| Matt Ohrberg | WAPA | FAC-008 R6 |
| Chris Colson | WAPA | FAC-008 R6 |
| Don Hargrove | OG&E | FAC-008 R6 |
| Terry Harbour | MidAmerican | FAC-008 R6 |
| Paul Mehlhaff | Sunflower | FAC-008 R6 |
| Andrew Coffelt | BPU | FAC-008 R6 |
| Ken Burruss | MWEnergy | CIP-007 R2, FAC-008 R6 |
| Angela Wheat | SWPA | CIP-007 R2, FAC-008 R6 |
| Tiffany Lake | Evergy | CIP-007 R2, FAC-008 R6 |
| Terri Pyle | OG&E | CIP-007 R2, FAC-008 R6 |
| Uhdoy Ganason | MRO | MRO Support; CIP-007 R2 |
| Kim Koster | MidAmerican | CIP-007 R2 |
| Carrie Reimers | MidAmerican | CIP-007 R2 |
| Kirsten Rowley | MISO | CIP-007 R2 |
| Ron Bender | NPPD | CIP-007 R2 |
| Patrick Wells | OG&E | CIP-007 R2 |
| Ken Burruss | MWEnergy | CIP-007 R2, FAC-008 R6 |
| Angela Wheat | SWPA | CIP-007 R2, FAC-008 R6 |
| Tiffany Lake | Evergy | CIP-007 R2, FAC-008 R6 |
| Terri Pyle | OG&E | CIP-007 R2, FAC-008 R6 |
| Michelle Olson | MRO | MRO Support |
| Bill Steiner | MRO | MRO Support |
| Mark Flanary | MRO | MRO Support |
| Tasha Ward | MRO | MRO Support |

Meetings

7/21/2023

Attendance: Ashley Stringer (OGE), Troy Brumfield (ATC), Larry Heckert (Alliant), Kevin Lyons (CIPCO), Angela Wheat (SWPA), Paul Mehlhaff (Sunflower), Andrew Coffelt (BPU), Kirsten Rowley (MISO), Ken Burruss (MWEnergy), Kim Koster (MidAmerican), Terry Harbour (MidAmerican), Bill Steiner (MRO), Michelle Olson (MRO), Mark Flanary (MRO), David Gadberry (MRO), Udhay Ganesan (MRO), Tasha Ward (MRO),

1. Bill provided overview of the initiative (presentation)
2. Overarching process discussion (governance)
3. Considerations for the template development
 - a. Self-logging/self-reports users guide
 - b. Consider risk and controls
 - c. Existing list of questions from RAM (David and Udhay)
4. Standard Requirement Team volunteers

| CIP-007 R2 Participants | FAC-008 R6 Participants |
|--------------------------------|--------------------------------|
| Udhay | David |
| Mark | Mark |
| Ken | Ken |
| Angela | Troy |
| Kirsten | Ashley |
| Kim | Larry |
| Carrie | Angela |
| Terri | Paul |
| Ron | Andrew |
| Tiffany | Terry |
| | Kevin |
| | Tiffany |
| | Terri |

5. Schedule Requirement Specific Project Team Meetings

Next Meeting Date TBD

2023 MRO CMEP AC Initiative

MRO Regional Risk Assessment (RRA) and Reliability Standard Coverage

Purpose: Identify, develop, deliver outreach for risks identified in the RRA that are not adequately covered by currently enforceable NERC Reliability Standards

Proposed Plan:

1. Review the risks identified in the RRA and assess coverage of associated currently enforceable Reliability Standards
2. Review Open NERC Projects for potential coverage
3. Identify if there are outreach opportunities associated with any gaps in coverage

Project Team:

| Name | Company | Risks Reviewed |
|-----------------|----------------|-----------------------|
| Ashley Stringer | OG&E | |
| Troy Brumfield | ATC | |
| Larry Heckert | Alliant | |
| Angela Wheat | SWPA | |
| Paul Mehlhaff | Sunflower | |
| Tiffany Lake | Evergy | |
| Terri Pyle | OG&E | |
| Bill Steiner | MRO | |
| Michelle Olson | MRO | |
| Tasha Ward | MRO | |
| Mark Flanary | MRO | |

Meetings

7/21/2023

Attendees: Ashley Stringer (OGE), Troy Brumfield (ATC), Larry Heckert (Alliant), Angela Wheat (SWPA), Paul Mehlhaff (Sunflower), Bill Steiner (MRO), Michelle Olson (MRO), Tasha Ward (MRO), Mark Flanary (MRO)

1. Overview of the project (see above)
2. Next Steps
 - a. Doodle poll for next meeting – target mid-August
 - b. Assignments
 - i. Review [2023 RRA](#) and [Infographic](#) in detail
 - ii. Identify risks to volunteer for
 - iii. Provide to Terri prior to next meeting (mid-August)

8/8/2023

Attendees:

Draft Agenda:

1. Review volunteer selections
2. Create teams, or individuals if preferred, and make assignments
3. Discuss processes
4. Determine expected deliverables
5. Establish due dates

Work Plan Updates

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.

Annual CMEP Conference O&P Highlights
Terri Pyle, CMEPAC Chair

Action

Discussion

Report

Chair Pyle will lead this discussion during the meeting.

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