MIDWEST RELIABILITY ORGANIZATION

Meeting Agenda

Compliance Monitoring Enforcement Program Advisory Council (CMEPAC)

November 10, 2022
9:00 am to 2:00 pm central

Via Webex Only

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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.

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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.

<u>Organizational Group Members should:</u>

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.

CMEPAC Q4 OPEN MEETING AGENDA

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

2 Standards of Conduct and Antitrust Guidelines
Terri Pyle, CMEP Advisory Council Chair

3 2023 Meeting Schedule
Michelle Olson, CMEP Advisory Council Secretary

4 Council Collaboration Brainstorming Activity
Jeff Norman, Director of Compliance Monitoring

5 Annual Survey Status
Theresa Allard, CMEP Advisory Council Member

6 Regional Risk Assessment Status Update
Theresa Allared, CMEP Advisory Council Member
Bryan Dixon, CMEP Advisory Council Member

7 Risk Document Update
Terri Pyle, CMEP Advisory Council
George Brown, NSRF Chair

Break – 10:30 a.m.

8 Work Plan Updates
Terri Pyle, CMEP Advisory Council Chair

  a. 2022 Work Plan Review and Wrap-up

  b. 2023 Work Plan Draft

9 Facility Ratings Themes Report
Bill Steiner, MRO Director of Risk Assessment & Mitigation
Jeff Norman, MRO Director of Compliance Monitoring
Tasha Ward, MRO Director of Enforcement and External Affairs

10 Sub Team Reports
  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

11 Standing Reports
  a. NERC Compliance and Certification Committee (NERC CCC)
    Erin Cullum Marcussen, NERC CCC Member

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

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

  d. SPP Reliability Compliance Advisory Group (RCAG)

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Mark Buchholz, CMEPAC and RCAG Member

e. MidContinent Compliance Forum (MCCF)
Mark Buchholz, CMEPAC and MCCF Member

Lunch 12:00 p.m.

12   Charter Review
Terri Pyle, CMEP Advisory Council Chair

a. CMEPAC

13   Ask CMEPAC
Terri Pyle, CMEP Advisory Council Chair

14   Action Item Review
Michelle Olson, CMEP Advisory Council Secretary

15   Other Business and Adjourn
CMEP Advisory Council Chair

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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.

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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).

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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.

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.

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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.

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2023 Meeting Schedule
Michelle Olson, Compliance Monitoring Administrator and Council Secretary

Action
Review and approve the 2023 proposed meeting dates.

Report
Below are the proposed meeting dates for the CMEPAC for 2023:

PROPOSED MEETING DATES FOR 2023				
	Q1 2023	Q2 2023	Q3 2023	Q4 2023
CMEPAC	2/21	5/3	8/9	10/11

MRO CONFERENCE DATES 2023	
Q3	**CMEP: July 25-26, 2023** **networking reception and conference**

Council Collaboration Brainstorming Activity
Jeff Norman, Director of Compliance Monitoring

Action
Information

Report
Jeff Norman will lead this discussion during the meeting.

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Annual Survey Status
Theresa Allard, CMEP Advisory Council Member

Action
Information

Report
Theresa Allard will lead this discussion during the meeting.

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Regional Risk Assessment Status Update
Theresa Allard, CMEP Advisory Council Member
Bryan Dixon, CMEP Advisory Council Member

Action
Review and Discussion

Report
Theresa Allard and Bryan Dixon will lead this discussion during the meeting.

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Risk Document Update
Terri Pyle, CMEP Advisory Council
George Brown, NSRF Chair

Action
Information

Report
Terri Pyle and George Brown will provide an update during the meeting.

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Work Plan Updates

a. 2022 Work Plan Review and Wrap-up
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.

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Work Plan Updates

b.   2023 Work Plan Draft
Terri Pyle, CMEPAC Chair

Action
Information

Report
Chair Pyle will lead this discussion during the meeting.

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Facility Ratings Themes Report
Bill Steiner, Director of Risk Assessment & Mitigation
Jeff Norman, Director of Compliance Monitoring
Tasha Ward, Director of Enforcement and External Affairs

Action
Information

Report
Bill Steiner, Jeff Norman, and Tasha Ward will lead a Q&A discussion during the meeting.

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Subteam Reports

a. Conference Subteam
Tiffany Lake, Vice Chair

Action
Information

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

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Subteam Reports
b.   Newsletter Subteam
Mark Buchholz, CMEPAC Member

Action
Information

Report
Mark Buchholz will provide an update during the meeting.

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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

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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

Currently there are 151 registered for the monthly calls.

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Subteam Reports
d.   Webinars Subteam
Terri Pyle, CMEPAC Chair

Action
Information

Report
Chair Pyle will provide an update during the meeting.

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Subteam Reports

e. Subteam assignments
Terri Pyle, CMEPAC Chair

Action
Discussion

Report
Chair Pyle will lead this discussion during the meeting.

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Standing Reports

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

Action
Information

Report
The report will begin on the next page.

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CCC Report

October 13, 2022 | 9:00 a.m. – 2:00 p.m. Eastern

Hybrid Meeting

ReliabilityFirst

The meeting began with remarks from Rob Manning, NERC Board of Trustees, and Jeff Craigo, Vice President Reliability & Risk, ReliabilityFirst.

Lifecycle of a Violation – Discussion led by James McGrane and Kristen Senk

James McGrane discussed that NERC and regions understand there is an issue with aging violations and have proposed some changes recently. James reviewed numbers of noncompliances submitted and those processed and highlighted the amount of coordination required to process a violation. Processing the violation requires engagement with the registered entity to ensure mitigation is effective, and if there is a penalty, that it bears a reasonable relationship to the seriousness of the violation. Finally, ERO has to ensure that it is approved.

Kristen Senk, RF Enforcement, provided an overview of the lifecycle of a violation. She explained that there is no discretion on whether to process a violation or not; they do process everything.
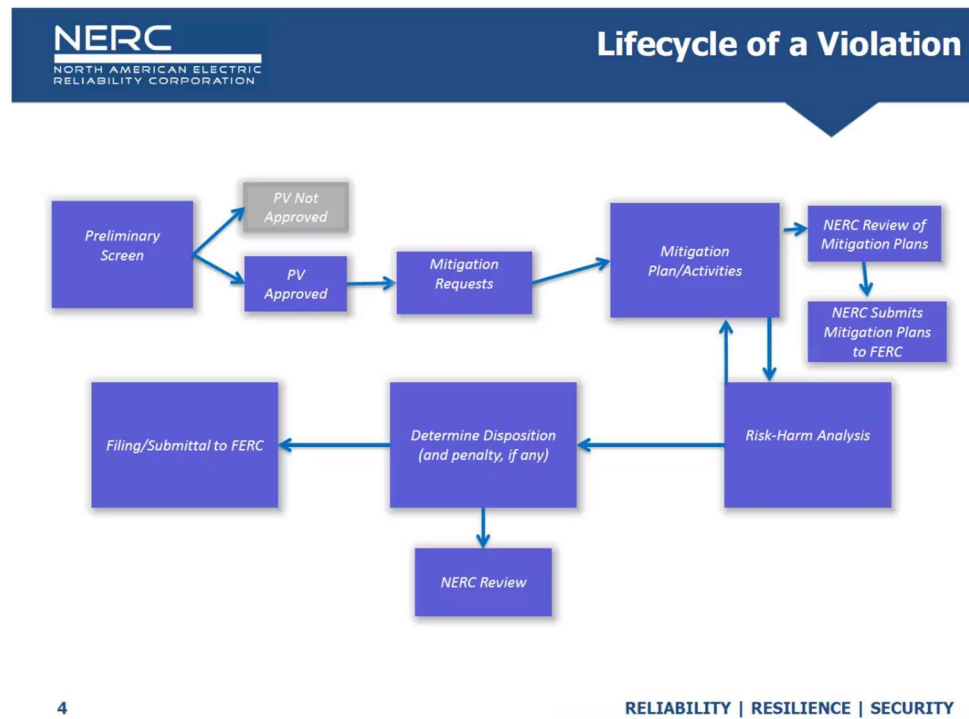
Once a violation is reported, a quick screen follows. Next, it goes through mitigation—every violation has to be mitigated. Violations can be reported in a number of ways, with 85% as self reports or self logs. Ms. Senk explained that they want to understand all of the facts that can reduce risk.

The ERO will look at mitigation with new controls, processes, training to prevent noncompliance. They want to see mitigation plans/steps scoped appropriately for the issue and risk. Ms. Senk noted that RF is willing to put entities with other successful entities.

With respect to the Verification of Mitigation, an entity has to give evidence that steps were completed. The CEA SMEs will review and verify. There have been recent efforts to streamline, where lower risk issues are sampled for evidence validation while the higher risk issues each have to be validated.
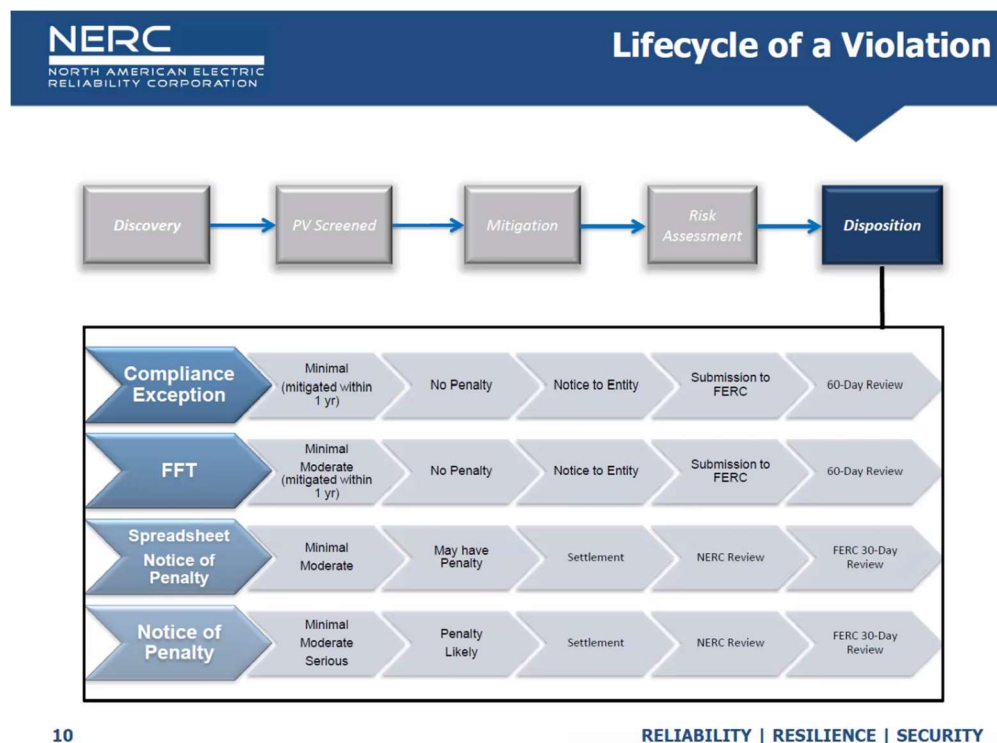
Credit can be given for cooperation and self identification. Aggravating factors are programmatic issues and concealment, which are rare. FERC reviews all dispositions, and prior to FERC reviews each disposition goes through multiple internal reviews at the CEA. These reviews ensure there is a sound basis for the conclusion and consistency among similar violations, NERC reviews for similar treatment across the entire ERO. With respect to the priority of processing, the ERO is looking at the oldest violations because they don't want things to sit longer.

Approximately 80-90% of dispositions are CE, 5% are FFT, and the rest are SNOP or NOP. An FFT is intended to bring a higher level of awareness. Both CE and FFT are streamlined and don't penalize the entity. There are a number of factors that are considered with respect to a penalty including: duration, risk factors, credits, aggravating factors, admission, settlement. These factors may not be as obvious in the descriptions. It was noted that cooperation credit is 20%. Efforts are made to remain consistent with the FERC penalty guidelines.

Of note, entities were cautioned about not overcomplicating the response to violations. Training is appropriate for lower risk where process is otherwise sound. For a higher risk issue they want a more holistic approach to look at prevention.

A question was asked about the preliminary screening and what the path is to communicate with the registered entity. It was explained that at RF the screening happens 10 days from entering into align, and that other regions may have slightly different time periods for communication. RF tries to send RFIs out within 2 months.

Credit is not necessarily given for "good" mitigation, but the more they know about the controls and mitigation definitely factors into the risk. Highlighting controls and existence of controls impacts the risk decision. The better you tell the story makes a difference as the noncompliance moves through the process and to FERC.

It was noted that it would be difficult for an entity to prove the burden that they don't have the ability to pay.

Focused Discussion – Align/SEL – Discussion panel led by Lonnie Ratliff

Align Release 3 for audits went live about 5 months ago. There are future enhancements and releases planned. The SEL is separate from Align and benefits were noted including: data protection, common platform, and focused approach on making progress and enhancements.

NERC explained that the Align releases are following an iterative approach. While deploying one version, NERC is testing and developing others. Release 4.5 is coming soon (December 2022) and will include the addition of Inherent Risk Assessments (IRA) and Compliance Oversight Plans (COP). NERC will be soliciting industry feedback, and noted that moving into these new tools will promote commonality across the ERO. NERC stated that it is continuously doing testing to ensure that the new patches do not impact other parts of the tool.

The Align User Group is tasked with reviewing the enhancement list and prioritizing the backlog of issues. New enhancement requests or issues should be submitted to askalign@nerc.net. Each region is represented on the Align User group and they appreciate any feedback. NERC acknowledged that there are issues with roles in the tool, printing capability, export of standards. They are trying to address issues and start getting additional releases out to address issues and update training.

During the pilot engagement, the ERO found efficiencies and increase in quality and consistency. They are looking at issues related to issues such as duplicate files because evidence had be submitted at a granular level and could not be filed to associate to multiple issues.

Two Registered Entities were on the call to provide information on their experiences:

SMUD was the first entity that WECC audited using Align. SMUD noted that the experience was better than expected. Audit was primarily remote with some site visits. SMUD found that Align was intuitive and easy to use. It was easy to navigate. RFIs weren't always easy to see in one view, but were always available in the "my tasks" screen. They found that they needed to frequently refresh Align. There is no time listed for the due date, but that information was available on the actual RFI itself. SMUD managed that by creating an internal spreadsheet. There were some issues with Align not retaining formatting, which created some challenges. Once information was pasted into Align, it had to be reformatted to

create tables, add any bolding or underlining, etc... SMUD realized that there weren't automatic notifications to the audit team when items were uploaded, so they just sent WECC email notifications when something was uploaded. The CIP team did not use RSAWs but included detailed information in the ERT responses. Feedback was provided to WECC and that was included in what is being considered by the Align users group.

ITC was a pilot audit for the RF region. ITC addressed the differences between Align and SEL. ITC suggested allowing entities to upload completed RSAWs to the SEL to save on the administrative burden of entering them into Align and taking the time to address the formatting clean up. ITC shared its experiences with RFIs. An entity does receive a notification that there is a new RFI and is provided a location to upload the requested information to the SEL. The entity also has to go into Align and respond that it has completed the request, which is an extra adminitstrative step. There are challenges with visibility once the information is uploaded. The registered entity loses sight of the uploaded material within Align once it is submitted. ITC also realized there were not itemized locations and everything was going into one area. To compensate, ITC made sure that file names were very specific. ITC highlighted the improvements they have seen with the self reporting features of Align.

Industry feedback from the CCC was shared with NERC. This included issues about access, as well as the NERC and support ticketing process. Lonnie Ratliff instructed that if a response is not received from NERC that the entity should reach back out to their Regional Entity point of contact. That POC can escalate it with NERC. With respect to visibility of uploaded documentation, Lonnie said that entities should be able to get a manifest showing a list of evidence that has been successfully uploaded. If you do not receive a manifest, please put a ticket in with NERC.

Feedback was also provided that size limits on files are an issue, along with difficulty submitting multiple documents at once. With audit evidence and thousands of pages of evidence, this can become a more significant issue. The usage window of the tool is an issue with the time zones, especially for entities in the western part of the country. NERC has made changes to enlarge the time frame to upload information into the tool, but also explained that there is a window of usage because of security issues.

NERC is prioritizing functionality fixes first. They are also focusing on training.

Subcommittee Voting Items

Nominating Subcommittee – Jennifer Flandermeyer

An email vote will be coming following this discussion to consider nominating procedural changes and the qualifications of CCC Members. A CCC member can be a registered entity, NERC Member or someone sponsored by someone who meets the qualifications, and Board approval is no longer required to approve out of cycle nominations. Jennifer noted that CCC membership is assigned to an individual (in other words if someone leaves a company, that company is not guaranteed a replacement spot). Validation of ability to serve will be handled on a case by case basis by the nomination subcommittee. A draft of the changes will be circulated by email for a vote.

EROMS – Leigh Mulholland

Leigh Mulholland provided an update on CCCPP-004, NERC Compliance and Certification Committee Hearing Procedures, CCCPP-005, NERC Compliance and Certification Committee Hearing Procedures for

use in Appeals of Certification Matters, and CCCPP-006, NERC Compliance and Certification Committee Mediation Procedures. CCCPP-008, Program for Monitoring Stakeholder's Perceptions was reviewed with the CCC and recommended for approval by EROMS. CCCPP-008 was approved by the CCC.

ORCS – Greg Campoli

Update provided on ORCS and certification activities. No action items.

The next CCC Meeting is February 1-2, 2023 in Pineville, LA (CLECO).

Standing Reports
b.   NERC Standards Committee (SC)
Troy Brumfield, NERC SC Member

Action
Information

Report
- The SC met on via a hybrid meeting on September 21, 2022.
- The committee reviewed the NERC Project Tracking spreadsheet and shared the status of Reliability Standards Projects under Development.
- NERC projects that were approved and will progress to the next phase of the Standards development process:

Project 2021-03 CIP-002 Transmission Owner Control Center
Request by NERC staff to appoint supplemental SDT members. After some discussion about additional members being added to this team, whether they should be organized as a SAR Drafting Team instead of a Standards Drafting Team and an explanation of the efficiencies this request would provide; the committee approved the motion to appoint the additional members.

Project 2020-02 Modifications to PRC-024 Generator Ride-through
Discussion for this project centered around the lack of representation by RCs and why one of the individuals nominated for the SDT was not recommended by NERC staff, even though their appointment would have given the team additional RC presence. The committee approved a motion to appoint supplemental members and vice chair to the Drafting Team (DT), as recommended by NERC staff, with the addition of candidate #3

Project 2021-02 Modifications to VAR-002-4.1
Motion approved to appoint additional candidates for Project 2021-02.

Project 2022-03 Energy Assurance with Energy-Constrained Resources
Appoint members, chair, and vice chair to the Standard Authorization Request (SAR) drafting team, with the addition of candidate #3 "since this individual has extensive experience and would bring perspective".

Project 2022-02 Modifications to TPL-001-5.1 and MOD-032-1
Accepted the Project 2022-02 Modifications to TPL-001 and MOD-032 Standard Authorization Requests (SARs); authorized drafting revisions to the Reliability Standards identified in the SARs; and appointed the Project 2022-02 SARs Drafting Team (DT) as the Project 2022-02 Standard Drafting Team (SDT).

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CIP-008 Reporting Threshold

SC Committee members encouraged coordination with EPRI and IEEE as related to the definition of "attempt to compromise." Accepted the CIP-008 Reporting Threshold Standard Authorization Request (SAR); authorized posting of the SAR for a 30-day informal comment period; and authorized solicitation of the SAR drafting team (DT) members

Project 2021-08 Modifications to FAC-008

Accepted Project 2021-08 Modifications to FAC-008 Standard Authorization Request (SAR); authorized drafting revisions to the Reliability Standard identified in the SAR; and appointed the Project 2021-08 SAR Drafting Team (DT) as the Project 2021-08 Standard Drafting Team

Project 2021-01 Modifications to MOD-025 and PRC-019

Committee discussed the possibility of moving MOD-025 into MOD-026 and retiring MOD-025. Authorized initial posting of proposed Reliability Standards MOD-025-3 and PRC-019-3, and the associated Implementation Plans for a 45-day formal comment period, with ballot pool formed in the first 30 days, and parallel initial ballot and non-binding polls for the Violation Risk Factors and Violation Severity Levels, conducted during the last 10 days of the comment period

Project 2021-05 Modifications to PRC-023

The committee authorized the initial posting of proposed Reliability Standard PRC-023-6 and the associated Implementation Plan for a 45-day formal comment period, with ballot pool formed in the first 30 days, and parallel initial ballots and non-binding polls on the

2023-2025 Reliability Standards Development Plan

A draft RSDP was circulated, then posted for informal industry comment from July 26 to August 24, 2022. The RSDP will be presented to the NERC Board of Trustees in November 2022 and subsequently submitted to the applicable governmental authorities for information.

Revisions to the NERC Rules of Procedure Regarding Reliability Standards

On Thursday, August 25, 2022, FERC issued an order approving proposed changes to the NERC Rules of Procedure (ROP) regarding Reliability Standards. The specific sections and attachments revised include:

• Section 300, Reliability Standards Development

• Appendix 3B, Procedure for Election of Members of the Standards Committee

• Appendix 3D, Development of the Registered Ballot Body

Project posting schedule and Project tracking spreadsheet

NERC agreed with committee members that the number of projects being posted has increased slightly and will significantly increase through the late summer months.

NERC Project Tracking Spreadsheet

NERC Project Posting Schedule

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- Legal updates and Review of filings
- There was some continued discussion about the increasing number of projects out for comment/allot and the upcoming projects. I believe there was a comment stating there are close 2000 hours of work to be done in the standards development area and the need for registered entity involvement is crucial.
- Adjournment

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Standing Reports

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

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The report will begin on the next page.

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Fourth Quarter 2022 Report
George E. Brown, Chair
Matt Harward, Vice Chair

I. General

- NSRF Membership: 17/21
  - ο Cooperative: 3/3
  - ο Canadian Utility: 1/3
  - ο Federal Power Marketing Agency: 2/3
  - ο Generator and Power Marketer: 2/3
  - ο Investor Owned Utility: 3/3
  - ο Municipal Utility: 3/3
  - ο Transmission System Operator: 3/3

➢ **Year to Date:**

- NSRF Meeting Held: 40/44 possible.

- NSRF Member & Guest Meeting Attendance, average per week: 84

- 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.

➢ **Year to Date:**

- NERC Standard Projects, SARs, NOPRs, et cetera Reviewed, on average per week: 3

- Total NSRF Comments Submitted: 16

- Total NSRF Voting Recommendations Made: 66

➢ **Activity Since Last Report:**

- Project 2016-02 – Modifications to CIP Standards | Virtualization - Draft 4: 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.

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

- Discuss the timeframe to ratify NSRF candidates after a special election and the possibility of shortening this timeframe through use of process that is outside of the various committees regularly scheduled meetings.
    - o Example: NSRF Voted on 02-02-2022, CMEPAC to vote on 02-15-2021 and OGOC to vote & ratify on 04-06-2022. A total of 63 days.

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

- The CMEPAC understood the concern in regards to the timeframe to ratify NSRF candidates and requested that this is discussed as a part of the aforementioned small group meeting.

- Update, on October 27, 2022, the NSRF charter was discussed. A recommendation to the meeting attendees to be made by November 30, 2022.

V. Other

- None

Standing Reports
d.   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 October 19, 2022, via WebEx. Topics from MCCF meetings since the last report included: Planning for the next MCCF Forum (virtual) tentatively scheduled for January 18, 2023, from 1:00 to 4:30 pm. Discussion also included 2023 MCCF BOD Officer Elections; an upcoming call with the MRO Director of Outreach and Engagement; and coordinating future meetings with MRO CMEPAC Meetings or other MRO events to utilize travel opportunities more efficiently for participants.

The next MCCF Board of Director's Meeting is scheduled for November 16, 2022, via WebEx.

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Standing Reports

e. 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 October 10, 2022, via WebEx. Meeting minutes are available on the SPP.org website. Topics from RCAG meetings since the last report included: a SPP Revision Request regarding Remedial Action Schemes; the SPP Breach Playbook; SPP Customer Relations Management Tool; a SPP Revision Request regarding Behind the Meter Generation reporting; a SPP Revision Request regarding modifications to Generation Interconnection Process; and an updated on SPP's work associated with NERC Project 2021-07 Extreme Cold Weather Operations. No stakeholder meetings will be scheduled on-site for the foreseeable future.

The next SPP RCAG Meeting is scheduled for November 14, 2022, via WebEx.

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CMEPAC Charter Review
Terri Pyle, CMEPAC Chair

Action
Review CMEPAC Charter and vote to recommend any proposed changes to the OGOC for approval.

Report
The charter for the CMEPAC will start on the next page.

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MIDWEST RELIABILITY ORGANIZATION

MRO Compliance Monitoring and Enforcement Program Advisory Council Charter

January 1, 2022

I. 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.

II. 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.

III. 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: 2021

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- 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.

IV. Meetings

The MRO CMEPAC will meet quarterly or as necessary, in person or via conference call and/or web meeting. ~~Once a year t~~Each quarter, the MRO CMEPAC Chair, Vice Chair, or CMEPAC member delegate will meet with the OGOC the day before a regularly scheduled board meeting.

> **Commented [JP1]:** Delete entire sentence to be consistent with revisions made by the RAC and SAC.

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,

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**MIDWEST
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Responsibilities, and Procedures of Organizational Groups and MRO Representation on NERC Organizational Groups.

V. Costs

Meeting costs incurred by MRO CMEPAC members are reimbursable by MRO according to Policy and Procedure 2–Expense Reimbursement.

VI. Reporting Requirements

~~The chair or vice chair of the MRO CMEPAC will provide an oral report to the OGOC regarding the Council's work as well as any emerging issues during the annual scheduled meeting.~~ ~~Q~~~~During the other quarterly~~ ~~meetings~~, the chair or vice chair of the MRO CMEPAC will provide a written report to the OGOC. 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 RAC will provide a written or oral report to the OGOC.

> **Commented [JP2]:** Delete entire sentence to be consistent with RAC and SAC.

> **Commented [JP3]:** Add this sentence here to be consistent with the RAC and SAC.

Approved by the MRO OGOC: 2021

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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.

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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.

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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

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