Meeting Agenda

CMEP Advisory Council Meeting

February 20, 2024
9:00 a.m. – 3:00 p.m. Central

Meeting Location: Webex

MIDWEST RELIABILITY ORGANIZATION

Public

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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MEETING AGENDA

Agenda Item
1. Call to Order, Determination of Quorum *Terri Pyle, CMEPAC Chair*
2. Standards of Conduct and Antitrust Guidelines *Terri Pyle, CMEPAC Chair*
3. Chair Remarks *Terri Pyle, CMEPAC Chair*
4. Consent Agenda *Terri Pyle, CMEPAC Chair*
5. CMEP Report Discussion *Tasha Ward, MRO Director of Enforcement and External Affairs*
6. CMEPAC Workplan *Terri Pyle, CMEPAC Chair*
7. RRA and Standards Coverage Initiative Update *Terri Pyle, CMEPAC Chair* *Mark Tiemeier, Principal Technical Advisor, MRO*
8. Requirement Specific RFI Initiative Update *Terri Pyle, CMEPAC Chair*
9. Future Enforceable Standards Project Update *Carl Stelly, Compliance Director, Southwest Power Pool, CMEPAC Member*
10. Standing Reports *Erin Cullum Marcussen, NERC CCC Representative* *Troy Brumfield, NERC SC Representative, CMEPAC Member* *Terri Pyle, NERC PMOS Representative, CMEPAC Chair* *Dane Rogers, MRO NSRF Chair* *Mark Buchholz, CMEPAC and RCAG Member* *Larry Heckert, CMEPAC and MCCF Member* *Jon Radloff, NERC FRTF Representative*
LUNCH
11. 2023 Annual Stakeholder Survey Results *Terri Pyle, CMEPAC Chair* *Tiffany Lake, CMEPAC Vice Chair* *Ashley Stringer, Manager NERC Compliance Risk and Controls, Oklahoma Gas and Electric, CMEPAC Member*
12. MRO CMEP Conference Topics Discussion *Terri Pyle, CMEPAC Chair*
13. Other Outreach Topic Ideas *Terri Pyle, CMEPAC Chair*
14. 2024 Team Assignments Review

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Terri Pyle, CMEPAC Chair
15. 2024 Work Plan Project Volunteers   *Terri Pyle, CMEPAC Chair*
16. 2024 Meeting Dates and Other Scheduled Outreach   *Terri Pyle, CMEPAC Chair*
17. Action Item Review   *Anna Martinson, RAM and Enforcement/External Affairs Administrator*
18. Other Business and Adjourn   *Terri Pyle, CMEPAC Chair*

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Call to Order and Determination of Quorum
Terri Pyle, CMEPAC Chair

Name	Role	Company	Term
Terri Pyle	Chair	Oklahoma Gas and Electric	12/31/2026
Tiffany Lake	Chair	Minnkota Power Cooperative	12/31/2026
Alison Archer	Member	MISO	12/31/2025
Ashley Stringer	Member	Oklahoma Gas and Electric	12/31/2026
Bryan Dixon	Member	Xcel Energy	12/31/2024
Carl Stelly	Chair	Southwest Power Pool	12/31/2024
Ellen Watkins	Member	Sunflower Electric Power Corporation	12/31/2025
Eric Ruskamp	Member	Lincoln Electric System	12/31/2026
Kevin Lyons	Member	Central Iowa Power Cooperative	12/31/2024
Larry Heckert	Member	Alliant Energy	12/31/2024
Mark Buchholz	Member	Western Area Power Administration	12/31/2025
Matt Caves	Member	Western Farmers Electric Cooperative	12/31/2025
Nazra Gladu	Member	Manitoba Hydro	12/31/2024
Theresa Allard	Member	Minnkota Power Cooperative	12/31/2026
Troy Brumfield	Member	American Transmission Co.	12/31/2025

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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.

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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.

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"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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Chair's Remarks
Terri Pyle, CMEPAC Chair

Action

Information

Report

The CMEPAC chair will lead this discussion during the meeting. Slides will begin on the next page.

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Midwest Reliability Organization

Introduction for New Advisory Council Members

Advisory Council Structure

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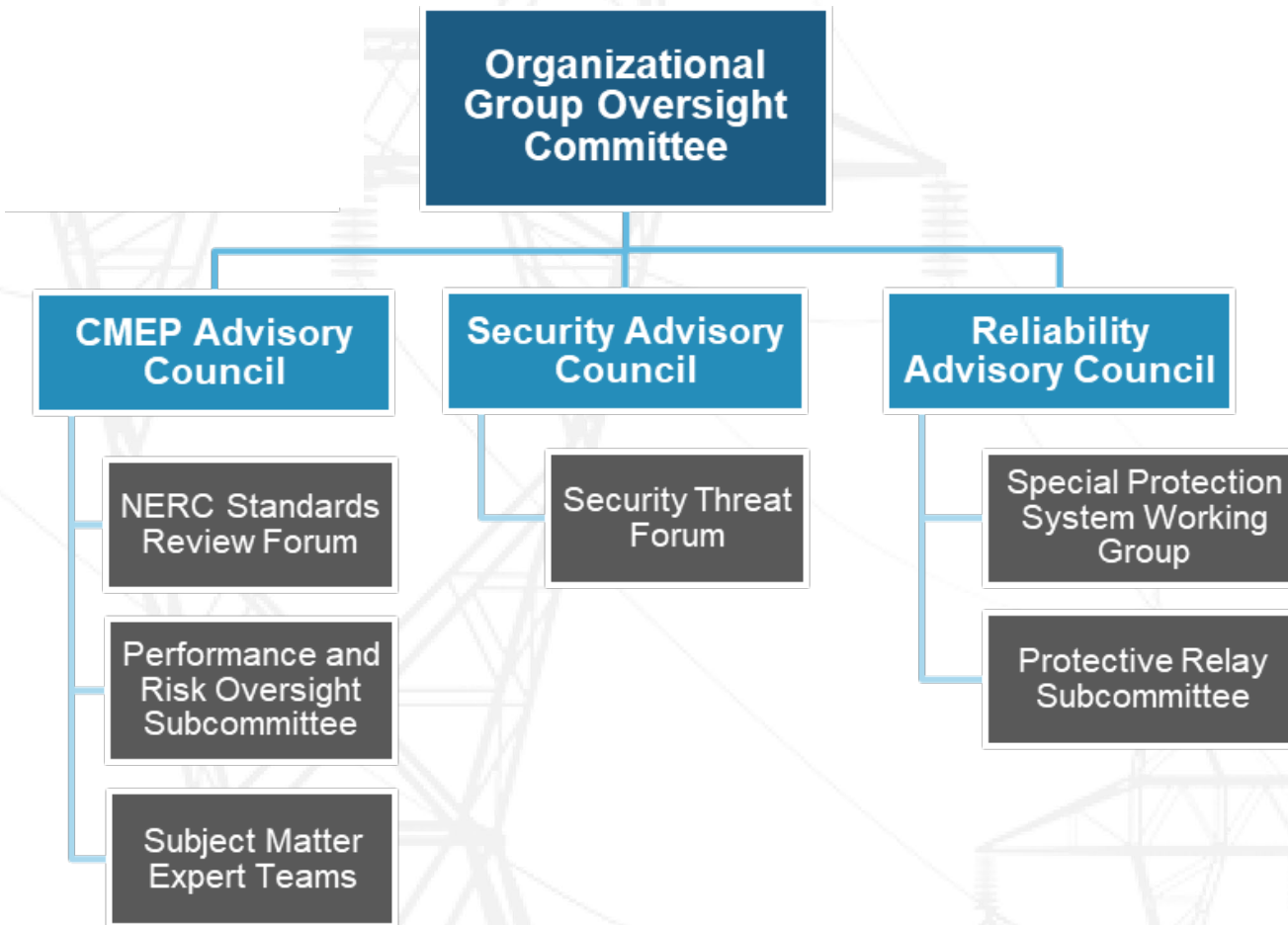
OGOC 2024 Roster

Member	Sector	Company
Ben Porath	COOP	Dairyland Power Cooperative
Darcy Neigum	<IOU	Montana-Dakota Utilities
Daryl Maxwell, **Vice Chair**	CU	Manitoba Hydro
Dehn Stevens	IOU ≥ 3000	MidAmerican Energy Company
Eric Miller	TSO	MISO
Eric Schmitt	Ind.	Independent Director
Iqbal Dhami	CU	Saskatchewan Power Corporation
James (Jim) Nail	Reg. (MU)	City of Independence, MO
Jeanne Tisinger	Ind.	Independent Director
JoAnn Thompson, **Chair**	<IOU	Otter Tail Power Company
Maurice Moss	MU	Kansas City Board of Public Utilities

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Guiding Principles for Council Members

- **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. Regularly attend meetings of the group(s) on which the member serves.

  2. Competently prepare for, and be an active participant in, the meetings for the group(s) on which the member serves.

  3. Collaborate with other organizational group members in support of the mission, vision, and strategic initiatives of MRO.

  4. Support the Highly Effective Reliability Organization (HERO^{TM}) principles.

Consent Agenda
Terri Pyle, CMEP Advisory Council Chair

Action
Vote to approve the consent agenda including:
- Q3 2023 MRO CMEPAC minutes
- Q4 2023 MRO CMEPAC minutes
- CMEPAC Call Guidelines

Report
The consent agenda materials will start on the next page.

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Final Minutes of the Compliance Monitoring Enforcement Program Advisory Council (CMEPAC) Meeting
OPEN
MRO Offices, St. Paul, MN / WebEx
August 09, 2023 9:00 AM

Notice for this meeting was electronically posted to the MRO website here on July 10, 2023. A final agenda, including advanced reading materials, was also posted on August 4, 2023.

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

MRO Compliance Monitoring and Enforcement Program Advisory Council (CMEPAC) Chair Terri Pyle called the meeting to order at 9:01 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.

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3 **Advisory Council Work Plans**

4 **Consent Agenda**
   Terri Pyle, CMEP Advisory Council Chair

   a. CMEPAC Q2 Open Minutes
       The minutes from the CMEPAC second quarter meeting was presented in the packet and during the meeting. Chair Pyle opened the floor for questions and comments. There was no discussion.
       Upon a motion duly made and seconded, the CMEPAC voted to approve the MRO CMEPAC 2023 Quarter 2 Open Meeting Minutes as presented from the May 31, 2023 meeting.

   b. 2024 Meeting Schedule
       Shawn Keller presented the schedule. Chair Pyle opened the floor for discussion. Steen presented several alternative options. For collaboration week, he recommended a two day event where there is a four hour collaboration session on the first day and the councils would have their own separate meeting on the second day. Carl Stelly recommended to have the Q2 meeting fully virtual to help focus the travel weeks for council members. Matt Caves suggested to alternate the the virtual and hybrid meetings. Fjalstad offered a satellite option. Theresa Allard provided a verbiage recommendation for meetings that are preferred to be in person. Q3 will be recommended in person. There was also a suggestion to align the Q3 CMEPAC meeting with MRO's CMEP Conference. Difficulties were presented with this. Fjalstad offered a suggestion of fully replacing the Q3 meeting with the CMEP conference. However, this would conflict with the charter and a verbiage change may need to be made. Cris recommended the CMEPAC Q3 meeting to be the day before the conference. No vote was made at this time on the meeting dates and it was taken off the consent agenda.

Upon a motion duly made and seconded, the CMEPAC voted to approve the consent agenda as adjusted during the meeting.

5 **Charter Review and Approval**
   Terri Pyle, CMEP Advisory Council Chair

   a. CMEPAC
       The CMEPAC charter was presented during the meeting and provided in the packet. Discussion ensued.
       Upon a motion duly made and seconded, the CMEPAC voted to approve the updates to the CMEPAC charter as presented to recommend to the OGOC for approval.

   b. NSRF
       The NSRF charter was presented during the meeting and provided in the packet.
       Upon a motion duly made and seconded, the CMEPAC voted to approve the updates to the NSRF charter as presented to recommend to the OGOC for approval.

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6 Annual CMEP Conference CIP Highlights
Terri Pyle, CMEP Advisory Council Chair

Caves provided an overview of the CIP and security topics that were presented in the annual MRO CMEP Conference. Slides and recording are posted on MRO's public website.

7 Standing Reports

    a. Project Management and Oversight Subcommittee (PMOS)
       Terri Pyle, CMEP Advisory Council Chair
       Terri Pyle provided an overview of the NERC PMOS report provided in the agenda packet. Discussion ensued.

    b. Facilities Ratings Task Force (FRTF)
       Jon Radloff, FRTF CMEPAC Representative
       Jon Radloff provided an overview of the FRTF report provided in the agenda packet. Discussion ensued.

    c. NERC Standards Committee (NERC SC)
       Troy Brumfield, NERC SC Representative
       Troy Brumfield provided an overview of the NERC Standards Committee report provided in the agenda packet. Discussion ensued.

    d. NERC Compliance and Certification Committee (NERC CCC)
       Erin Cullum Marcussen, NERC CCC Representative
       Due to time constraints, this report was moved to later in the meeting. Erin Cullum provided and overview for the NERC CCC report presented during the meeting. Discussion ensued.

    e. 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.

    f. MidContinent Compliance Forum (MCCF)
       Mark Buchholz, CMEPAC and MCCF Member
       Mark Buchholz was unable to make the meeting. Chair Pyle provided an oral update to accompany the written report included in the agenda packet.

    g. SPP Reliability Compliance Advisory Group (RCAG)
       Mark Buchholz, CMEPAC and RCAG Member
       Mark Buchholz included a written report included in the agenda packet.

8 Regional Risk Assessment Update
Mark Tiemeier, MRO Principal Technical Advisor

Mark Tiemeier provided a brief update on the RRA. The slides are included in the packet. Discussion on the project and how it affects compiance programs ensued.

9 Subteam Reports

    a. Conference Subteam
       Matt Caves, CMEPAC Member
       Caves provided an overview of the presentations and feedback from the CMEP conference that took place on July 26, 2023. Due to the extent of the

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topic, the CMEPAC chose to forgo this report and split it into item 6 for CIP topics and item 12 for O&P topics. Discussion ensued.

  b. Monthly Call Subteam
  Eric Ruskamp, CMEPAC Member
  Eric Ruskamp provided a written report of the CMEPAC Monthly Calls. Discussion ensued and it was decided that the CMEPAC would take an action item to reconsider the frequency of the calls.

  c. Webinar Subteam
  Bryan Dixon, CMEPAC Memebr
  Bryan Dixon gave an overview of the written report that was provided in the packet. Discussion ensued.

  d. Newsletter Subteam
  Theresa Allard, CMEPAC Member
  Theresa Allard provided and overview of the written report provided in the packet.

  e. Ask CMEPAC
  Terri Pyle, CMEPAC Chair
  Chair Pyle provided an oral report of the AskCMEPAC status. There have been no questions submitted to the AskCMEPAC since the previous CMEPAC meeting in quarter two.

10 RRA and Associated Standards Assessment
Terri Pyle, CMEP Advisory Council Chair

Chair Pyle provided an update on the CMEPAC's RRA and Associated Standards Assessment projects. Slides for these updates have been provided in the packet.

Lunch 12:00 p.m.

The CMEPAC recessed for lunch from 12:10 p.m. Central until 1:00 p.m. Central.

11 Work Plan Updates
Terri Pyle, CMEP Advisory Council Chair

The CMEPAC workplan was presented during the meeting and updated were made to items below the blue line.

12 Annual CMEP Conference O&P Highlights
Terri Pyle, CMEP Advisory Council Chair

Caves provided an overview of the O&P topics that were presented in the annual MRO CMEP Conference. Slides and recording are posted on MRO's public website.

13 Action Item Review
Michelle Olson, CMEPAC Meeting Secretary

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

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14 Other Business and Adjourn
Terri Pyle, CMEP Advisory Council Chair

Having no further business to discuss, the meeting adjourned at 2:26 p.m. Central.

Prepared by: Michelle Olson, Council Secretary

Reviewed and Submitted by: Bill Steiner, MRO Director of Compliance

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Exhibit A – Meeting Attendees

MRO Staff	
Name	**Title**
Bryan Clark	Director, Reliability Analysis
Carolina Margaria	Assistant Corporate Secretary and Governance Administrator
Cris Zimmerman	Manager of Outreach and Stakeholder Engagement
Jess Syring	Compliance Monitoring Manager, CIP
Julie Sikes	Compliance Monitoring Manager, O&P
Kabir Dogubo	Senior Risk Assessment and Mitigation Engineer, O&P
Lee Felter	Principal Security Engineer
Margaret Eastman	Security Administrator
Michelle Olson	Compliance Monitoring Administrator
Rebecca Schneider	Reliability Analysis Administrator
Rumyana Kreidler	Manager of Risk Assessment and Mitigation, O&P
Sara Smith	Enforcement Attorney
Shawn Keller	Outreach Coordinator
Steen Fjalstad	Director of Security
Udhay Ganesan	Principal RAM Engineer CIP
William Steiner	Director of Compliance Monitoring
Guests	
Name	**Organization**

Andrew Coffelt	Board of Public Utilities Kansas City KS
Angela Wheat	Southwestern Power Administration
Ashley Calderon	Board of Public Utilities
Ashley Stringer	Oklahoma Gas and Electric
Ayobami Idowu	Saskatchewan Power Corporation
Carl Stelly	Southwest Power Pool
Chad Wasinger	Sunflower Electric
Christine M Kane	WEC Energy Group
Colton Brostuen	Mountrail-Williams Electric Cooperative
Dallas Rowley	Oklahoma Gas and Electric
Derek Cherneski	Saskatchewan Power Corporation
Dillan Vigil	Golden Spread Electric Cooperative
Dion Donais	Saskatchewan Power Corporation
Ellen Watkins	Sunflower Electric Power Corporation
Eric Ruskamp	Lincoln Electric System
Erin Cullum	Southwest Power Pool
Fred Meyer	Algonquin Power & Utilities Corp.
Hillary Creurer	Minnesota Power
Jeremy Severson	Basin Electric Power Cooperative
John Stephens	City Utilities of Springfield
Jon Radloff	American Transmission Company
Joseph Knight	Great River Energy
Ken Burruss	Midwest Energy, Inc.
Kevin Lyons	Central Iowa Power Cooperative
Larry Brusseau	Corn Belt Power Cooperative
Larry Heckert	Alliant Energy
Mary Agnes Nimis	Federal Energy Regulatory Commission

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Nazra Gladu	Manitoba Hydro
Omar Elabbady	Xcel Energy
Paul Mehlhaff	Sunflower Electric Power Corporation
Ron Gunderson	Nebraska Public Power District
Stephen McGie	Kansas City Board of Public Utilities
Terri Pyle, CMEPAC Chair	Oklahoma Gas and Electric
Terry Harbour	MidAmerican Energy Company
Theresa Allard	Minnkota Power Cooperative
Tina Adams	Western Farmers Electric Cooperative
Troy Brumfield	American Transmission Company

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MIDWEST RELIABILITY ORGANIZATION

Final Minutes of the Compliance Monitoring Enforcement Program Advisory Council (CMEPAC) Meeting
OPEN
WebEx
October 19, 2023 9:00 AM

Notice for this meeting was electronically posted to the MRO website here on September 27, 2023. A final agenda, including advanced reading materials, was also posted on October 13, 2023.

Agenda Item

1   Call to Order and Determination of Quorum
Terri Pyle, CMEP Advisory Council Chair

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 and reminded attendees of the MRO Organization Group Guiding Principles. 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   Robert's Rules of Order
Terri Pyle, CMEP Advisory Council Chair

Chair Pyle noted the adherence to utilizing Robert's Rules of Order

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

Chair Pyle reviewed the Standards of Conduct and Antitrust guidelines.

4   2024 Meeting Schedule
Terri Pyle, CMEP Advisory Council Chair

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The meeting Secretary and MRO Compliance Monitoring Administrator, Michelle Olson, presented the CMEPAC meeting and CMEP Conference schedule for 2024. The first quarter meeting will be held February 20, 2023, the second quarter meeting will be held on May 7, 2024, the third quarter meeting will be held on July 23, 2024, and the fourth quarter meeting will be held on October 3, 2024. The MRO CMEP Conference will take place in Kansas City on July 24, 2024 with the networking reception occurring the night before on July 23, 2024. Olson brought up a concern regarding the date of the first quarter meeting as she will not be available that date. Discussion ensued. Upon further internal MRO discussions, a decision was made to keep the scheduled date of February 20, 2024, and a back-up meeting secretary was found for this instance.

5 CMEPAC Work Plan Updates
Terri Pyle, CMEP Advisory Council Chair

The CMEPAC reviewed the 2023 work plan and updated the status of items below the blue line. The items below the blue line were also updated with comments to transfer to the draft 2024 work plan. Chair Pyle, Vice Chair Lake, Olson, and the CMEPAC liaisons, Bill Steiner, Director of Compliance Monitoring, Tasha Ward, Director of Enforcement and External Affairs, and Mark Flanary, Director of Risk Assessment and Mitigation, will meet offline to finalize the draft of the 2024 work plan.

Break – 10:30 a.m.

6 NERC Compliance and Certification Committee (CCC) Report
Erin Cullum Marcussen, NERC CCC Representative

Erin Cullum provided an overview for the NERC CCC report presented during the meeting. Discussion ensued. The written report can be found as a handout attached on the meeting page on MRO's website.

7 NERC Project Management and Oversight Subcommittee (PMOS) Report
Terri Pyle, CMEPAC Chair and NERC PMOS Representative

Terri Pyle provided an overview of the NERC PMOS report provided in the agenda packet. Discussion ensued.

8 NERC Standards Committee (SC) Report
Troy Brumfield, CMEPAC Member and NERC SC Representative

Troy Brumfield provided an overview for the NERC SC report presented during the meeting. Discussion ensued. The written report can be found as a handout attached on the meeting page on MRO's website.

9 NERC Facilities Ratings Task Force (FRTF) Report
Jon Radloff, NERC FRTF Representative

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

10 NERC Supply Chain Task Force (SCTF) Report
Mark Zellner, NERC SCTF Representative

There was no report for the NERC SCTF due to disbandment.

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11 MRO NERC Standards Review Forum (NSRF) Report
George Brown, MRO NSRF Chair

George Brown provided an overview of the NSRF report provided in the packet. Discussion ensued.

12 MidContinent Compliance Forum (MCCF) Report
Mark Buchholz, CMEPAC and MCCF Member

Mark Buchholz provided an overview of the MCCF report provided in the packet and announced that Larry Heckert will be providing these reports going forward. Discussion ensued.

13 SPP Reliability Compliance Advisory Group (RCAG) Report
Mark Buchholz, CMEPAC and RCAG Member

Lunch 12:00 p.m.

14 Monthly Call Subteam Report
Eric Ruscamp, CMEP Advisory Council Member

Eric Ruskamp provided a written report of the CMEPAC Monthly Calls. Larry Heckert provided an oral overview in Ruskamp's absence. The CMEPAC decided that the new CMEPAC monthly call frequency will be for the calls to occur during the months that there is no formal CMEPAC meeting. This new frequency will be in effect starting in 2024. Discussion ensued

15 Conference Subteam Report
Matt Caves, CMEP Adivisory Council Member

Matt Caves provided a written report for the conference subteam. The next MRO CMEP Conference is scheduled for July 24, 2024 in Kansas City, KS. Preparations will begin early in the first quarter of 2024.

16 Webinar Subteam Report
Bryan Dixon, CMEP Advisory Council Member

Bryan Dixon gave an overview of the written report that was provided in the packet. Discussion ensued.

17 Newsletter Subteam Report
Theresa Allard, CMEP Advisory Council Member

Theresa Allard provided an overview of the written report provided in the packet.

18 Ask CMEPAC
Terri Pyle, CMEP Advisory Council Chair

Chair Pyle provided an oral report of the AskCMEPAC status. There have been no questions submitted to the AskCMEPAC since the previous CMEPAC meeting in quarter three.

Break – 1:30 p.m.

19 Action Item Review

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Michelle Olson, CMEPAC Meeting Secretary

Olson reviewed the list of captured action items for clarity. The CMEPAC also reviewed and updated the action items captured in previous meetings.

20 Other Business and Adjourn

Terri Pyle, CMEP Advisory Council Chair

The meeting adjourned at 1:57 p.m. Central.

Prepared by: Michelle Olson, Council Secretary

Reviewed and Submitted by: Bill Steiner

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Exhibit A – Meeting Attendees

MRO Staff	
Name	**Title**
Bryan Clark	Director, Reliability Analysis
Kabir Dogubo	Senior Risk Assessment and Mitigation Engineer, O&P
Michelle Olson	Compliance Monitoring Administrator
Margaret Eastman	Security Administrator
Mark Flanary	Director of Risk Assessment and Mitigation
Tasha Ward	Director of Enforcement and External Affairs
Anna Martinson	Risk Assessment and Mitigation Administrator
Guests	
Name	**Organization**
Adrian Harris	MISO
Alison Archer	MISO
Allie Gavin	ITC Holdings
Andrew Coffelt	Kansas City Board of Public Utilities
Angela Wheat	Southwestern Power Administration
Ashley Calderon	Board of Public Utilities
Ashley Stringer	Oklahoma Gas and Electric
Ben Widder	Madison Gas and Electric
Brett Holland	Evergy
Bryan Dixon	Xcel Energy
Carl Stelly	Southwest Power Pool

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Daniel Graham	Basin Electric Power Cooperative
Daniel Moore	Western Farmers Electric Cooperative
Derek Cherneski	Saskatchewan Power Corporation
Ellen Watkins	Sunflower Electric Power Corporation
Erin Cullum	Southwest Power Pool
Gail Elliott	ITC Holdings
George Brown	Pattern Operators LP
Hillary Creurer	Minnesota Power
Hyun Me Pak	Sunflower Electric Power Corporation
Jacob Thielbar	Western Area Power Administration
Jon Radloff	American Transmission Company
Kalem Long	Algonquin Power & Utilities Corp.
Kathleen Black	ITC Holdings
Ken Burruss	Midwest Energy, Inc.
Kylee Kropp	Sunflower Electric Power Corporation
Larry Brusseau	Corn Belt Power Cooperative
Larry Heckert	Alliant Energy
Lindsey Fry	ITC Holdings
Marc Gomez	Southwestern Power Administration
Mark Buchholz	Western Area Power Administration
Mary Agnes Nimis	Federal Energy Regulatory Commission
Matt Caves	Western Farmers Electric Cooperative
Michael Ayotte	ITC Holdings
Michael Watt	Oklahoma Municipal Power Authority
Nazra Gladu	Manitoba Hydro
Owen Veale	Kansas City Board of Public Utilities

Paul Mehlhaff	Sunflower Electric Power Corporation
Ron Bender	Nebraska Public Power District
Ronald Bauer	Madison Gas and Electric
Stephen McGie	Kansas City Board of Public Utilities
Terri Pyle	Oklahoma Gas and Electric
Terry Harbour	MidAmerican Energy Company
Terry Volkmann	Glencoe Light and Power
Theresa Allard	Minnkota Power Cooperative
Tiffany Lake	Evergy
Tina Adams	Western Farmers Electric Cooperative
Tracey Stewart	Southwestern Power Administration
Troy Brumfield	American Transmission Company

MIDWEST RELIABILITY ORGANIZATION

MRO Compliance Monitoring Enforcement Program Advisory Council (CMEPAC)

CMEP Call Guidelines

Last Updated: February 2024

Purpose

The Midwest Reliability Organization Compliance Monitoring Enforcement Program Advisory Council (MRO CMEPAC) is hosting a monthly outreach call.

Goal

The goal of the monthly calls is to create an open and robust venue for MRO regional sharing of timely and topical information to enhance the reliability and security of the Bulk Electric System.

Guidelines

1. CMEP calls will generally occur every second Tuesday from 3:00-4:00 p.m. CT of each month that does not also have a CMEPAC quarterly meeting.

2. The MRO staff supporting the MRO CMEPAC will handle the logistics of the call/WebEx setup and invitations.

3. The CMEP Call team lead or the chair or vice chair of the MRO CMEPAC will moderate the calls unless otherwise designated, with the assistance of other MRO CMEPAC members. Moderation will include starting the discussion, keeping the discussion on target and ending the discussion. The moderator will also make the decision to terminate a participant's connection.

4. MRO staff and MRO Board participation is limited to those who directly support the MRO CMEPAC, including the MRO CMEP directors and MRO CMEP Administrators, unless approved on a case by case basis by the MRO CMEPAC. Regulatory Entity staff that have a compliance enforcement role will not be approved to be on the CMEP Monthly Call. The CMEPAC moderator will announce the presence of MRO Staff and MRO Board members at the start of the call. The call moderator will announce the presence of MRO Staff and MRO Board members at the start of the call. This call and its content is about sharing compliance-related security and reliability information. This call is not to get or share compliance advice, but may be used to share compliance best practices and related information.

5. The call is limited to employees of MRO registered entities unless approved on a case by case basis by the MRO CMEPAC. Case by case participants are encouraged to make themselves known upon connection to the call. Participants must follow the WebEx procedure to provide their full name and company name or acronym when connecting to the web meeting, and provide their participant ID when dialing into the audio portion. The MRO CMEPAC will conduct light vetting of unknown or unverified participants (e.g., identified in Participant Panel as "Caller [#]"), who may be removed from the meeting without notice.

6. All MRO registered entities will be encouraged to register but are not required to participate. A separate contact list comprised of vetted registrations will be used to send meeting login information.

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Participants may call in from a conference room if multiple participants from an entity wish to participate.

7. No detailed notes, minutes or recordings will be maintained. Tracking may include whether a call took place, the duration and number of attendees.

8. Periodic evaluations of the CMEP call (e.g., email survey and/or defined metrics) will be conducted to determine if there is Return on Investment.

Approved by the Organizational Group Oversight Committee: September 2020

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CMEP Report Discussion
Tasha Ward, MRO Director of Enforcement and External Affairs

Action
Information

Report
The report is available on MRO's website and is also included in the packet.

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CMEP Summary Report
Midwest Reliability Organization
December 31, 2023

This document was prepared to provide a summary of areas addressing key issues, trends, and significant events in the MRO region related to its delegated authorities set forth in the Compliance Monitoring and Enforcement Program (CMEP).

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

Compliance Oversight Plans (COPs)

A Compliance Oversight Plan (COP) is an entity-specific oversight strategy that begins with an assessment of the entity's inherent risk, existing controls, and prior performance. This process includes a detailed review of the entity's registration, compliance history, system performance and event history, and other risk factors. The resulting COP identifies what reliability standards are the focus for future compliance monitoring activities based on the entity's risk. The COP also identifies the appropriate interval for MRO's monitoring activities and the type of tools that should be expected during oversight. MRO continues to innovate the COP process by integrating it closely with Align and is developing tools for analyzing COPs to identify trends and develop outreach opportunities.

2023 Compliance Audit Status

MRO completes periodic Compliance Audits to assess registered entities' compliance with the NERC Reliability Standards. MRO staff have completed all 14 scheduled Compliance Audits for 2023 and assisted in six Coordinated Oversight audits (led by another regional entity).Coordinated Oversight is a joint engagement with other regions for multi-regional registered entities that have been approved to participate in Coordinated Oversight. Coordinated Oversight Compliance Audits allow for more efficient monitoring activities for the regions. MRO utilizes these engagements to identify and share best practices with the other Regional Entities.

Self-Certifications

MRO revised the Self-Certification scoping process and implemented a guided Self-Certification process. The risks identified in the MRO Regional Risk Assessment and the ERO Enterprise CMEP Implementation Plan are the two primary considerations that Compliance uses when determining the scope for the guided Self-Certifications. One advantage of the guided Self-Certification process is that it allows MRO to address both continent-wide and region-wide risks through a single process at a more frequent interval than Compliance Audits. MRO's Self-Certification schedule is available on its website.

WebCDMS Transition to ALIGN
The transition to ALIGN from webCDMS, as MRO's primary CMEP tracking/communication tool, was determined complete as of December 31, 2023.This significant effort included data migration for both US and Canadian entities in both Q3 and Q4 2023. Registered entities should no longer be using webCDMS.

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Risk Assessment and Mitigation Trends

In the following charts and statistics, the numbers reflect all historic issues of noncompliance in the expanded MRO region.
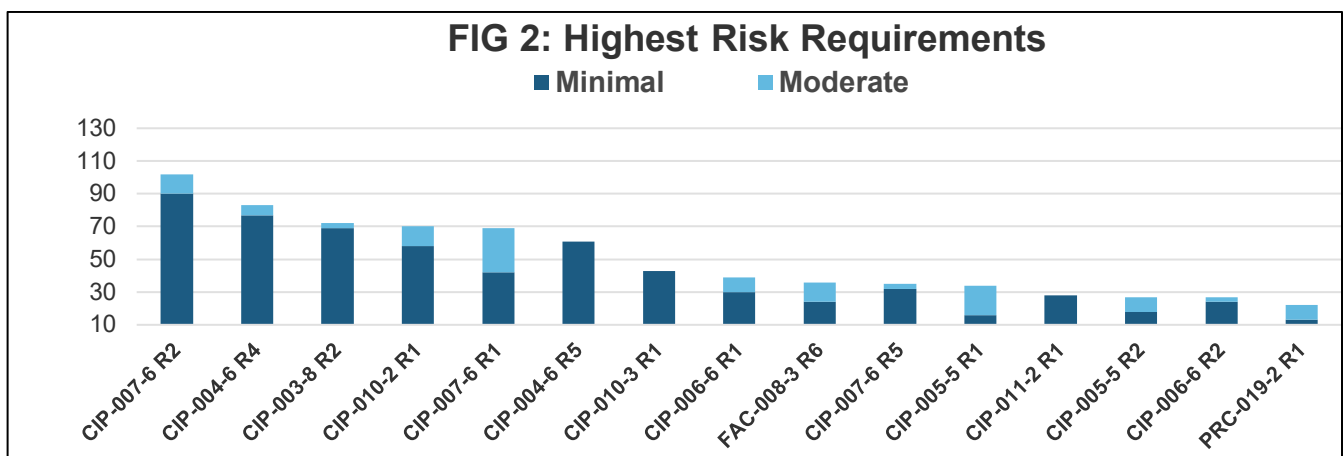
Compliance Severity Index (Figure 1)

MRO staff use the Compliance Severity Index (CSI), shown in Figure 1, to evaluate progress toward a key reliability goal of less severe violations. The CSI represents the total risk that instances of noncompliance bring to the reliability or security of the bulk power system in the MRO region. The CSI is calculated using the risk determination and Discovery Method for each noncompliance. MRO has seen a notable decrease in the risk of issues of noncompliance over the past decade due to an overall improvement in the culture of compliance. Registered entities are self-identifying issues of noncompliance in a timely manner prior to issues presenting a greater risk to reliability.

FIG 1: Compliance Severity Index By Discovery Year

2019	2020	2021	2022	2023
100%	97%	81%	57%	19%

% of Risk Determinations Completed
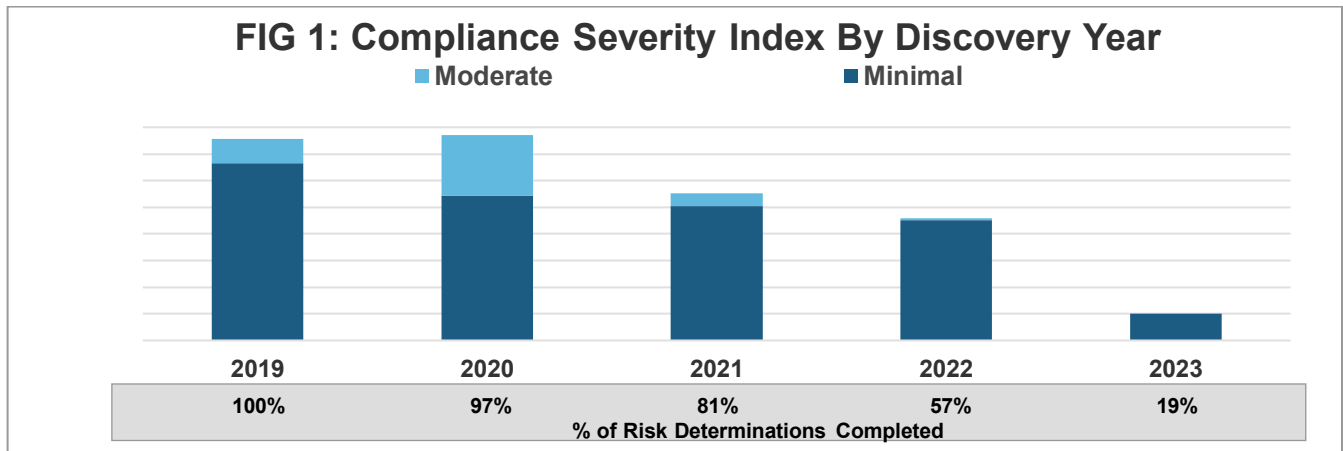
Highest Risk Issues of Noncompliance (Figure 2)

Figure 2 provides the 15 highest risk requirements, from January 1, 2019 to December 31, 2023, that have a history of issues of noncompliance, based on the CSI. Higher risk violations are associated with cyber and physical security standards, accurate facility ratings, and timely maintenance of protection systems.
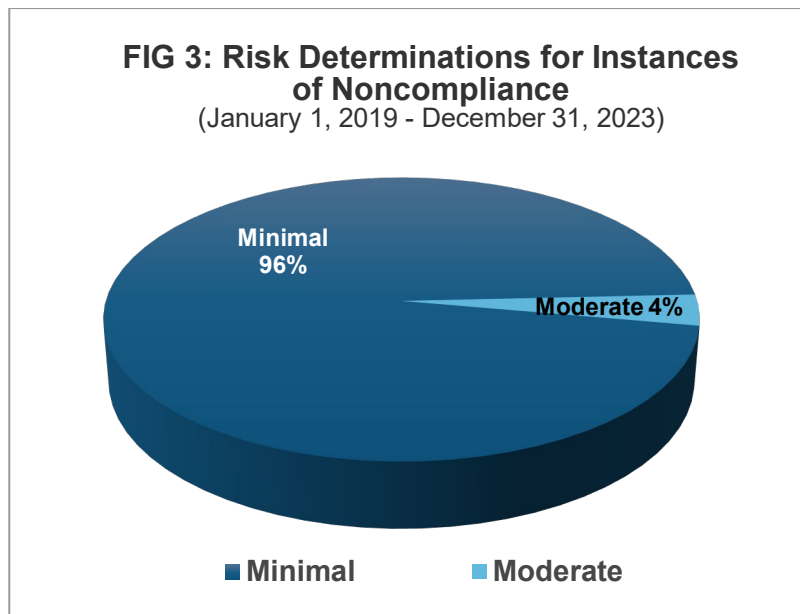

FIG 2: Highest Risk Requirements

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Description of the Top Five Highest Risk Requirements (Figure 2)

- CIP-007-6 R2: Requires a patch management process for tracking, evaluating, and installing cyber security patches for applicable Cyber Assets. A high-volume monthly requirement in which even the most mature security programs will have occasional noncompliance.
- CIP-004-6 R4: Implement access management programs which authorize access to applicable BES Cyber Systems.
- CIP-003-8 R2: Specify consistent and sustainable security management controls.
- CIP-010-2 R1: Requires current baseline configurations for applicable Cyber Assets.
- CIP-007-6 R1: Intended to minimize the attack surface of BES Cyber Systems through disabling or limiting access to unnecessary network accessible logical ports and services and physical I/O ports.

Risk Determinations for Issues of Noncompliance (Figure 3)

Ninety-six percent of all instances of noncompliance from January 1, 2019 to December 31, 2023, were determined to be minimal risk. There is a correlation between the percentage of issues of noncompliance being minimal risk (Figure 3) and the percentage of self-reported issues of noncompliance. Entities are identifying noncompliance earlier before the issues become more impactful to the reliability and security of the bulk power system.
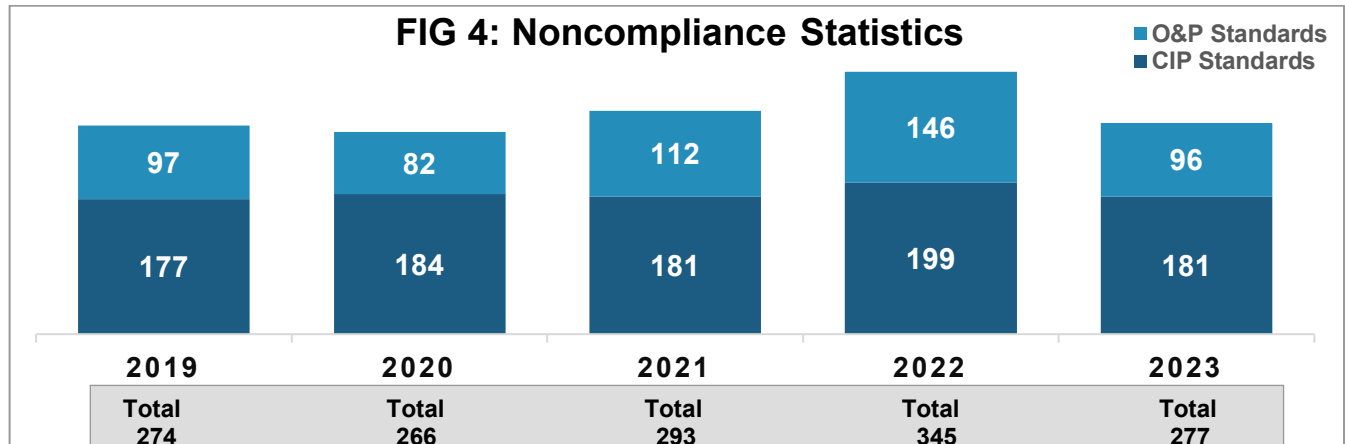
FIG 3: Risk Determinations for Instances of Noncompliance
(January 1, 2019 - December 31, 2023)

Minimal 96%, Moderate 4%

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Noncompliance Trends and Statistics

Breakdown of Critical Infrastructure Protection (CIP) vs. Non-CIP Possible Issues of Noncompliance (Figure 4)
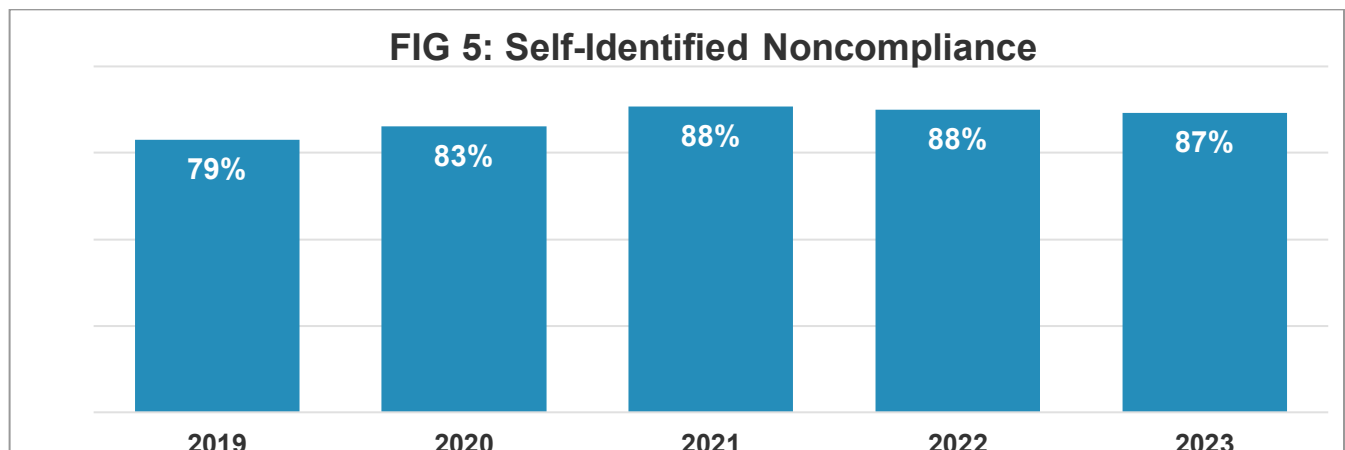
The noncompliance statistics and trends in Figure 4 are discovered and reported to NERC. Each bar represents a year from 2019 through 2023.

FIG 4: Noncompliance Statistics

■ O&P Standards
■ CIP Standards

	2019	2020	2021	2022	2023
O&P Standards	97	82	112	146	96
CIP Standards	177	184	181	199	181
Total	274	266	293	345	277

Registered Entity Responsibility (Figure 5)

MRO staff analyzes how often registered entities self-identify and accept responsibility for noncompliance. These trends are indicators of the commitment among registered entities in the region to perform self-assessments of their compliance with the reliability standards. The high percentages, reflected in Figure 5 , demonstrate a strong governance and compliance culture of registered entities in the MRO region, as well as registered entities' willingness to accept, and learn from, discovered issues of noncompliance in order to prevent future noncompliance with NERC Reliability Standards.

Figure 5 reflects issues of self-identified noncompliance that MRO issued dispositions from January 1, 2019 to December 31, 2023.

FIG 5: Self-Identified Noncompliance

2019	2020	2021	2022	2023
79%	83%	88%	88%	87%

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Discovery Method Detail (January 1, 2019 through December 31, 2023) (Figure 6)

In Figure 6, the numbers reflect the discovery method for all noncompliances in the MRO region that were reported to NERC or other applicable Regulatory Authority.

FIG 6: Discovery Method								
Discovery Method Detail	**2019**	**2020**	**2021**	**2022**	**2023**	**Sub Total**	**(-less) Dismissed**	**Adjusted Total**
Compliance Audit	46	41	18	18	27	150	17	133
Compliance Investigation	0	0	0	0	0	0	0	0
Data Submittal	0	0	0	0	1	1	0	1
Self-Certification	11	6	17	24	9	67	13	54
Self-Log	131	141	155	182	174	783	9	774
Self-Report	86	78	103	121	65	453	17	436
Spot Check	0	0	0	0	1	1	0	1
Totals	**274**	**266**	**293**	**345**	**277**	**1455**	**56**	**1399**

Noncompliance Processing Methods (Figure 7)

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

Figure 7 includes issues of noncompliance for entities that were registered in the MRO region during the specified time period.
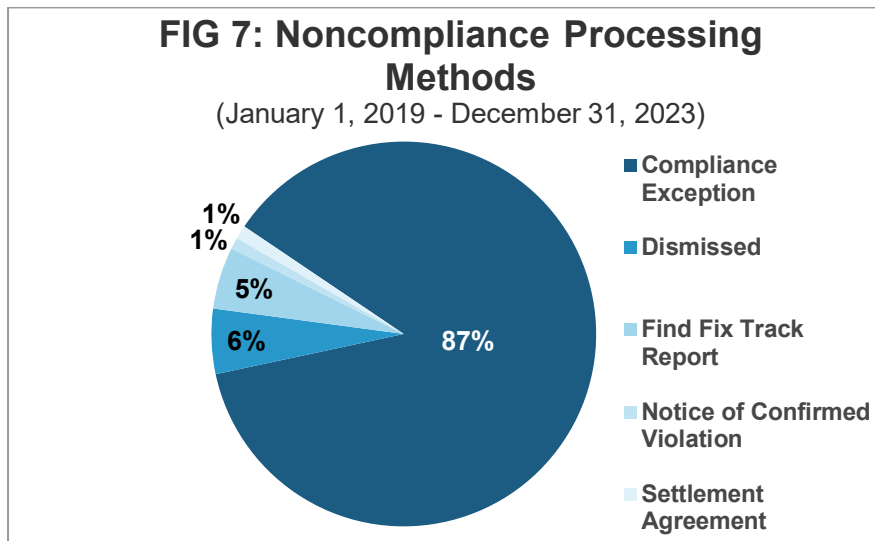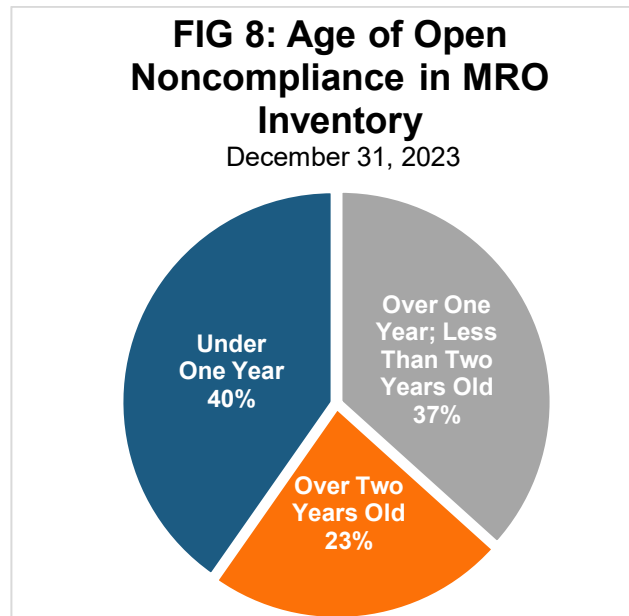

FIG 7: Noncompliance Processing Methods
(January 1, 2019 - December 31, 2023)

Legend: Compliance Exception (87%), Dismissed (6%), Find Fix Track Report (5%), Notice of Confirmed Violation (1%), Settlement Agreement (1%)

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Figure 8 illustrates the aging time for all open instances of noncompliance reported to MRO and applicable government authority.

FIG 8: Age of Open Noncompliance in MRO Inventory
December 31, 2023

- Under One Year: 40%
- Over One Year; Less Than Two Years Old: 37%
- Over Two Years Old: 23%

For questions on this report, please contact MRO's Enforcement Department at:
enforcement@mro.net

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Work Plan Updates
Terri Pyle, CMEPAC Chair

Action
Vote

Report
The work plan is available on the CMEPAC Collaboration site and will be presented during the meeting. Please come prepared to discuss any updates or additions to the work plan. A motion to recommend the workplan to the Organizational Group Oversight Committee for approval will be made after discussion.

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MRO CMEPAC 2024 Draft Work Plan

Item	Work Item	Source	Activity	Timing	Responsible Party	Notes
1	Standard Review	NSRF Charter; MRO Strategic Priority 3 - Objective 3	NSRF should review NERC Standards Development projects and develop comments and voting recommendations.	Periodically	NSRF	
2	Risk	MRO Strategic Priority 3 - Objective 1	Identify potential gaps in standards that do not comprehensively address risk to the BES with a priority on risks that have been identified as part of the MRO RRA.	Periodically	CMEPAC Members	
3	MRO's Regional Risk Assessment	MRO Strategic Goal	Increase engagement and participation in the MRO Regional Risk Assessment process.	Annually	CMEPAC Members	
4	Collaboration with industry working groups and forums	MRO Strategic Priority 1 - Objective 3; MRO Strategic Priority 3, Objectives 3 and 6	Monitor other industry working groups i.e. SC, CCC, RSTC, and MCCF (and applicable sub-committees) regarding projects/initiatives and issues/risks the groups are seeing ERO wide and in the MRO footprint. Seek opportunities to add value to ongoing efforts or identify duplicative activities that could be eliminated.	Periodically	CMEPAC Members	
5	Entity Outreach	Charter; ERO/MRO defined Risks; Standard Application Guides; potential non-compliance RFIs	Conduct outreach and awareness to promote compliance. Consider noncompliance and emerging risk data provided by MRO staff to determine if there are opportunities for additional outreach and awareness.	Periodically	CMEPAC Members	
6	Self-Certification worksheet review	MRO Priority 2 - Objective 4; 2023 CCC Work Plan - Program Support Efforts: Chapter 2 Project2.	CMEPAC to review and provide feedback on MRO's self-certification worksheets prior to issuance to registered entities. MRO Staff to communicate back to CMEPAC the changes made to the worksheets prior to issuance.	Periodically	CMEPAC Members	
7	Alignment of MRO and Registered Entity Expectations	MRO Priority 3 - Objective 3 and 6; 2023 CCC Work Plan - Program Support Efforts: Chapter 2, Program 2.	Provide advice and counsel to MRO's Board of Directors, staff, members and registered entities on topics like the development, retirement, and application of NERC Reliability Standards, RRA, compliance monitoring, and the enforcement of applicable standards.	Periodically	CMEPAC Members	
8	Annual Survey	CMEPAC Charter; feedback from Entities	Conduct annual survey of members to obtain feedback and ensure value add opportunities are being delivered to members.	Annually	CMEPAC Members	

MRO CMEPAC 2024 Draft Work Plan

Item	Work Item	Source	Activity	Timing	Responsible Party	Notes

The items above this row are seeking/have been granted OGOC approval. The items below this row are example ideas on how the advisory council could implement any approved work plan items.

#	Work Item	Source	Activity	Timing	Responsible Party	Notes
1	Charter	Work Plan Item 3	CMEPAC and NSRF Charter reviews. Discuss better integration of CMEPAC and NSRF.	Qtr 2	CMEPAC Members and NSRF members	
2	Council Collaboration	Charter and ERO/MRO defined Risks	Create partnerships with RAC and SAC to collaborate on emerging issues, risks, compliance issues, etc. to ensure alignment of work plans and activities across the region.	Periodically	CMEPAC Members	Consider obtaining feedback from RAC and SAC on the Requirement Specific RFIs
3	Council Collaboration	Work Plan Item 4	MRO Collaboration Site Enhancements	Periodically	MRO CMEPAC Support Staff and Leadership	
4	Entity Outreach	Work Plan Item 5	Create a CMEPAC webinar/material library	Periodically	MRO staff and Terri Pyle, Theresa Allard, Tiffany Lake, Carl Stelly, Michelle Olson	
5	Entity Outreach	Work Plan Item 5, 7	CMEP Conference - Planning agenda and speakers.	Qtr 1	CMEPAC Members, Conference Team	[Team: Terri Pyle, OG&E (Lead); Alison Archer, MISO; Tiffany Lake, Evergy]
6	Entity Outreach	Work Plan Item 5, 7	Monthly Calls - Develop agendas and recruit leads and speakers for topics that promote compliance.	Monthly	CMEPAC Members, Monthly Call Team	[Team: Eric Ruskamp, NPPD (Lead); Ashley Stringer, OG&E; Larry Heckert, Alliant Energy; Troy Brumfield, ATC] January: 2024 Self Cert Schedule (Kendra Buesgens, MRO); Q4 OGOC Meeting Recap (Tiffany Lake, Evergy); 2024 CMEPAC WorkPlan (Terri Pyle, OG&E) February: No meeting; Q1 CMEPAC meeting 2/20 March:
7	Entity Outreach	Work Plan Item 5, 7	Articles - Write and submit newsletter articles (or other MRO communications) that promote compliance.	Periodically	CMEPAC Members, Newsletters Team	[Team: Theresa Allard, Minnkota (Lead); Kevin Lyons, CIPC; Mark Buccholz, WAPA; Nazra Gladu, Manitoba] Q1: Overview of FERC Order 902 (Mark Buccholz) Q2: Periodic Data Submittals (Nazra Gladu)

MRO CMEPAC 2024 Draft Work Plan

Item	Work Item	Source	Activity	Timing	Responsible Party	Notes
8	Entity Outreach	Work Plan Item 5, 7	Webinars - Provide webinars on topics that promote compliance.	Periodically	CMEPAC Members, Webinars Team	[Team: Bryan Dixon, Xcel (Lead); Carl Stelly, SPP; Ellen Watkins, Sunflower; Matt Caves, WFEC] Q1: February 28 - Complaance Management Program Tools (Bryan Dixon, Xcel Energy and Ashley Stringer, OG&E) Q2:
9	Entity Outreach	Work Plan Item 5, 7	AskCMEPAC - field questions from entities and provide responses to those questions.	Periodically	CMEPAC Members	
10	Self-Certification worksheet review, Alignment	Work Plan Item 6, 7	Self-Certification Worksheet Reviews	Periodically	CMEPAC Members, MRO	December 2023: 2024 CIP-012 R1
11	Annual Survey	Work Plan Item 8	Conduct annual stakeholder urvey of members to obtain feedback and ensure value add opportunities are being delivered to members.	Qtr 3	CMEPAC Members, MRO	
12	Risk, MRO's Regional Risk Assessment	Work Plan Item 2, 7	RRA Participation	Periodically	Volunteers TBD	
13	Risk, MRO's Regional Risk Assessment, Outreach	Work Plan Item 2, 5, 7	Review MRO RRA and currently enforceable NERC Reliability Standards and identify which Standard requirements potentially address identified risks and the effectiveness to reduce risk. Use the results of this analysis in future MRO RRAs.	Periodically	CMEPAC Members and the new team, Ashley Stringer, Troy Brumfield, Tiffany Lake, Larry Heckert, Angela Wheat, Paul Mehlhalf, and Terri Pyle	
14	Risk	Work Plan Item 2	RFI templates for higher risk or high violated Standard requirements	Periodically	MRO staff and CMEPAC Members, Ashley Stringer, Troy Brumfield, Tiffany Lake, Larry Heckert, Angela Wheat, Paul Mehlhalf, Andrew Coffelt, Kevin Lyons, and Terri Pyle	
15	Entity Outreach	Work Plan Item 5	Review upcoming standards for outreach opportunities including SAGs and Readiness Assessments	Periodically	CMEPAC Members, Carl Stelly and lead and Alison Archer	
16	Alignment of MRO and Registered Entity Expectations	Work Plan Item 7	CMEP Reports - posting and review with Council	Periodically	Tasha Ward	

RRA and Standards Coverage Initiative Update
Terri Pyle, CMEPAC Chair
Mark Tiemeier, Principal Technical Advisor, MRO

Action
Information

Report
Terri Pyle and Mark Tiemeier will provide an update. Slides will begin on the next page.

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CMEP AC Initiative
MRO RRA and Reliability Standards

2024 Q1 CMEP AC Status Update
Terri Pyle, OG&E

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RRA and Standards Project Team

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

RRA and Reliability Standards

- **Purpose**
  - Identify Reliability Standard requirements that may control the risks identified in the RRA
  - Score the potential effectiveness of those Reliability Standard requirements to control those risks

- **Benefits**
  - Include applicable Reliability Standard requirements in the RRA Report
  - Provide the annual CMEP AC volunteers for the RRA process with vetted input and information
  - Identify, develop, deliver outreach for risks identified in the RRA that are not adequately covered by currently enforceable NERC Reliability Standards
  - Continued focus on RISK and identify opportunities to reduce risk

- **Project Update**
  - Complete and delivered to MRO for incorporation into the 2024 MRO RRA Report

Considerations and Next Steps

- **Considerations**
  - The MRO RRA identifies emerging risks; many are not addressed by currently enforceable Reliability Standards
  - Some Open NERC Projects are in development to address some of the identified risks
  - Consider identifying these NERC Projects for subsequent input into the RRA once they are finalized and enforceable

- **Next Steps**
  - Identify CMEP AC volunteers for the 2025 MRO RRA process
  - Identify volunteers for the 2024 RRA/Reliability Standards Coverage Project that will serve as input to the 2025 RRA

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Open Q&A

MRO 2024 Regional Reliability Risks and 2025 RRA Timeline

Mark Tiemeier

Principal Technical Advisor

Public

Regional Risk Assessment Process

Risk Actions

Risk Identification

Purpose: Identify and prioritize risks for the reliable and secure operations of the bulk power system within the MRO footprint.

Inform MRO's strategic plan and guide development of actions to address risks.

Risk Report

Risk Assessment

Risk Validation

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2024 Regional Risk Assessment

Top risks to the reliable and secure operation of the regional bulk power system.

Published Feb 5, 2024

Uncertain Energy Availability
As dispatchable resources are retired and replaced with resources that have limited energy availability, there is uncertainty around the generation fleet's ability to meet energy demand.
01
EXTREME RISK

Extreme Cold Weather
Longer and more intense extreme cold weather systems continue to cause challenges with electricity and natural gas supply, placing portions of the region at high risk of system outages.
02
HIGH RISK

Supply Chain Compromise
Potential malicious manipulation of systems within the supply chain, and the limited number of industrial control system vendors in the energy sector, creates a broad threat to grid reliability.
03
HIGH RISK

IBR and DER Performance
The growing fleet of inverter-based resources behave much differently than conventional resources, creating modeling and performance challenges that threaten reliable grid operations.
04
HIGH RISK

Equipment Unavailability
The global supply chain has not fully recovered from COVID-19 pandemic restrictions, creating difficulties in sourcing & replacing critical electrical grid equipment.
05
HIGH RISK

Physical Attacks
Increased tensions from global conflicts and the political climate has heightened physical security risks to the grid, which is a prime target for mass disruption.
06
HIGH RISK

Malicious Insider Threat
Intentional, malicious behavior of individuals with access to critical systems potentially threaten harm to grid operations through a targeted attack.
07
HIGH RISK

Essential Reliability Services
A disorganized transition from conventional resources to inverter-based resources could result in a loss of essential services that support reliability of the bulk power system.
08
HIGH RISK

More information about bulk power system regional risk and mitigating activities can be found at www.mro.net

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2024 Regional Reliability Risks
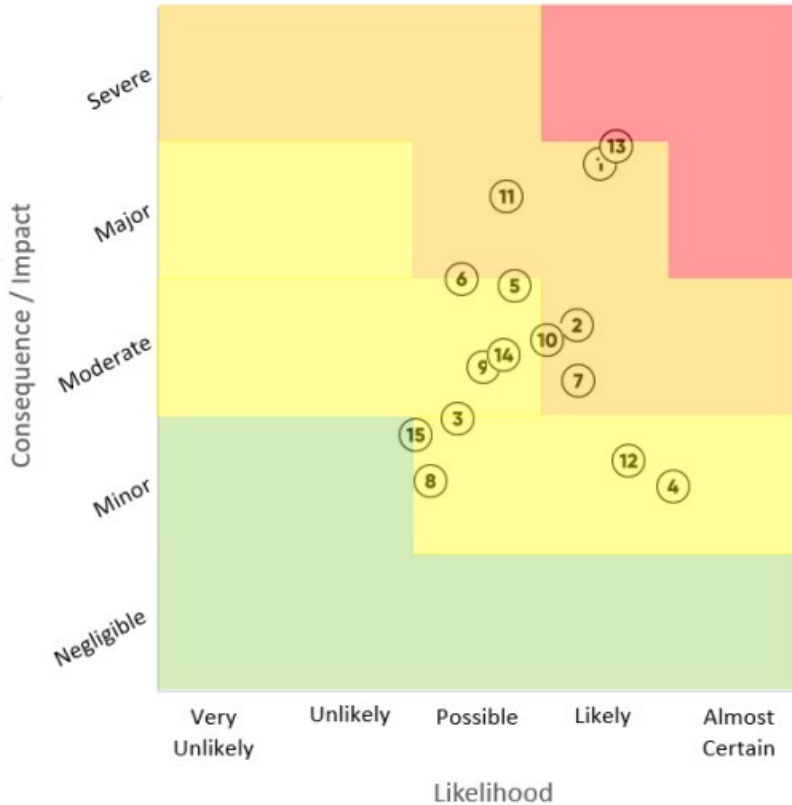
	Reliability Risks
1	Generation Unavailability During Extreme Cold Weather
2	Inadequate IBR and DER Modeling and Performance
3	Increased Penetration of Internet-Connected Devices
4	Insufficient Physical Access Controls
5	Loss of Essential Reliability Services
6	Malicious Insider Threat
7	Material and Equipment Unavailability
8	Misoperations Due to Human Errors
9	Phishing / Malware / Ransomware
10	Physical Attacks
11	Supply Chain Compromise
12	Tight Supply of Expert Labor
13	Uncertain Energy Availability
14	Use of Inaccurate Transmission Facility Ratings
15	Vulnerabilities of Unpatched Systems

CLARITY | **ASSURANCE** | **RESULTS**

4

2024 RRA Webinar

Wednesday, February 28, 2024

9:00-10:00am

https://www.mro.net/event/2024-regional-risk-assessment-overview-webinar/
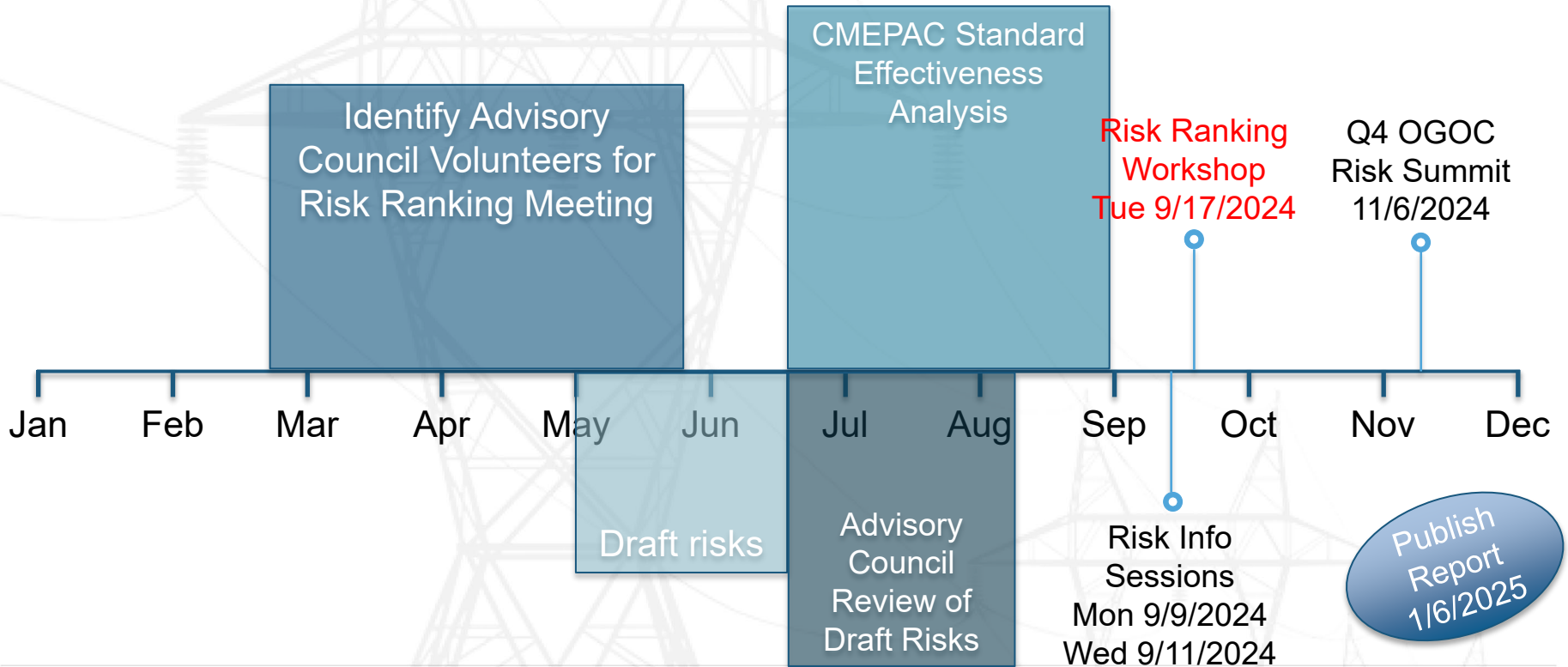
Requirement Specific RFI Initiative Update
Terri Pyle, CMEPAC Chair

Action
Information

Report
Terri Pyle will provide an update and answer questions on the Requirement Specific RFI initiative.

CLARITY
Outreach & Engagement

ASSURANCE
Oversight & Risk Management

RESULTS
Reliability Performance

CMEP AC Initiative

Requirement Specific RFI

2024 Q1 CMEP AC Status Update

Terri Pyle, OG&E

Requirement Specific RFIs

- **Purpose**
  - Develop requirement specific RFIs (frequently violated Reliability Standard requirements) for use by RAM and industry.
    - Initial RFIs: CIP-007-6 R2 and FAC-008-5 R6

- **Benefits**
  - Streamline the RAM review process by establishing a template that outlines the documentation RAM will request for processing self-logs, self-reports, and monitoring findings for a specific requirement;
  - Potential to reduce number of RFIs entities receive during processing of a non-compliance;
  - Collaboration and open-discussion among MRO and industry in the development of the templates provides unique perspective of each and mutual understanding;
  - Industry may utilize the RFI as reference for appropriate level of documentation for their compliance programs.

- **Project Update**
  - Project Kick-off meeting 07/21/2023
  - Divide into two separate Subteams for work on individual requirements

CIP-007-6 R2 Update

Project Team CIP-007-6 R2

Name	Company
Angela Wheat	SWPA
Carrie Reimers	MidAmerican
Ken Burruss	MWEnergy
Kim Koster	MidAmerican
Kirsten Rowley	MISO
Patrick Wells	OG&E
Ron Bender	NPPD
Ross Dudzik	Minnesota Power
Terri Pyle	OG&E
Tiffany Lake	Evergy
Bill Steiner	MRO
David Gladberry	MRO
Mark Flanary	MRO
Michelle Olson	MRO
Tasha Ward	MRO
Udhay Ganesan	MRO

Project Updates

- MRO provided "typical" questions and documentation requests during RFI process

- Brain-stormed off those questions

- Discussion of what is one-size-fits all vs unique to the specific non-compliance

- Small group work on initial draft to send to team for review/feedback

- Communication Plan

FAC-008-5 R6

Project Team FAC-008-5 R6

Name	Company
Andrew Coffelt	BPU
Angela Wheat	SWPA
Ashley Stringer	OG&E
Chris Colson	WAPA
Don Hargrove	OG&E
Kayleigh Wilkerson	OPPD
Ken Burruss	MWEnergy
Kevin Lyons	CIPCO
Larry Heckert	Alliant
Matt Ohrberg	WAPA
Paul Mehlhaff	Sunflower
Terri Pyle	OG&E
Terry Harbour	MidAmerican
Tiffany Lake	Evergy
Troy Brumfield	ATC
Bill Steiner	MRO
David Gadberry	MRO
Mark Flanary	MRO
Michelle Olson	MRO
Tasha Ward	MRO
Udhay Ganesan	MRO

Project Updates

- MRO provided "typical" questions and documentation requests during RFI process

- Brain-stormed off those questions

- Discussion of what is one-size-fits all vs unique to the specific non-compliance

- Team member shared spreadsheet used for their internal use

- Small group reviewed spreadsheet and provided input

- Requested input on spreadsheet from MRO RAM and enforcement

- Small groups

  - Refining spreadsheet for larger group (in process)

  - Develop instructions for template

  - Communication Plan

CLARITY   ASSURANCE   RESULTS

Public

Considerations and Next Steps

- **Considerations**
  - In some cases, submittals are missing key information
    - Align and "additional information"
    - [Registered Entity Self-Report and Mitigation Plan.pdf (nerc.com)](nerc.com)
  - Format – checklist, form, or combination?
  - Approval and maintenance?

- **Next Steps**
  - Finalize draft documents (Q2)
  - Revisit Project Team – review/feedback
  - Socialize CMEP AC and potentially RAC and SAC

Open Q&A

Future Enforceable Standards Project Update
Carl Stelly, Compliance Director, Southwest Power Pool, CMEPAC Member

Action
Information

Report
Carl Stelly will provide an update on the Future Enforceable Standards Project. Slides will begin on the next page.

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Reliability Performance

FUTURE ENFORCEABLE STANDARDS TEAM (FEST)

CMEPAC Q1 UPDATE

SPP *Southwest Power Pool*

Working together to responsibly and economically keep the lights on today and in the future.

SouthwestPowerPool   SPPorg   southwest-power-pool

OBJECTIVE

- Identify potential outreach opportunities, and

- Identify existing sources of information, while

- Preparing for future enforceable NERC Reliability Standards

Public

HOW

- Review list of FERC Approved Standards Subject to Future Enforcement on a quarterly basis.

- Solicit stakeholder input on Future Enforceable Standards that might benefit from additional outreach.

  - Prioritize those standards that are considered an elevated risk in the MRO Regional Risk Assessment.

- Identify existing resource materials, if available.

- Work with stakeholders to propose appropriate deliverable(s).

Identify requirements for outreach	Determine appropriate outreach method	Deliver outreach	Add to MRO outreach library

WHERE WE ARE NOW

- Refining draft scope

- Identifying mechanism for mapping components:
  - Standards and effective dates
  - Identifying risk rating
  - Existing materials
  - Potential outreach opportunities
  - Repository

Public

NEXT STEPS

- Meet with MRO to identify overlap and collaboration opportunities.

- Finalize scope.

- Implement the process.

GREAT TEAM!

- Alison Archer

- Theresa Allard

- Larry Heckert

Standing Reports
Erin Cullum Marcussen, NERC CCC Representative
Troy Brumfield, NERC SC Representative, CMEPAC Member
Terri Pyle, NERC PMOS Representative, CMEPAC Chair
Jon Radloff, NERC FRTF Representative
Dane Rogers, MRO NSRF Chair
Mark Buchholz, CMEPAC and RCAG Member
Larry Heckert, CMEPAC and MCCF Member

Action
Information

Report
The following written reports have been included in the packet.

10a: NERC Compliance and Certification Committee

10b: NERC Standards Committee

10c: Project Management and Oversight Subcommittee

10d: NERC Facility Ratings Task Force

10e: MRO NERC Standards Review Forum

10f: SPP Reliability Compliance Advisory Group

10g: Mid-Continent Compliance Forum

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RESULTS
Reliability Performance

Compliance and Certification Committee (CCC) Meeting Report

January 25, 2024

Virtual Meeting

Q1 Focused Discussion: Standards Prioritization and the Role of CMEP

New/Modified Standards – Compliance Preparation

Lonnie Ratliff, NERC Staff, led the discussion. Lonnie noted that there are a lot of projects underway. Simultaneously, there is also a lot of compliance monitoring happening even as we prepare for the new or changing projects.

Emerging of changing risks are leading to new Standards or current Standard modifications, and FERC Order 901 (inverter based resources) and Cold Weather Standards were cited as examples.

Lonnie explained how the CMEP staff get involved early on, noting that they engage in modified standards, implementation guidance, practice guides, and new standards. He explained that they do interact with standards staff. The rules do encourage them to share and interact. The ERO CMEP staff are trying to take a more proactive role. There are opportunities to work together such as on RSAWs.

He further noted that collaboration has increased in these processes in recent years. There are ERO collaboration groups that meet regularly. For example, the CIP collaboration meets weekly.

In response to a question on the role of CMEP staff in the development of Align working papers, Lonnie explained that this is a very collaborative process and that ERO staff are engaged in the development or modification.

A question was posed about the future of RSAWs, especially with Align Working Papers and CIP ERT? Lonnie indicated that his personal opinion is that it would be worth looking at the value, especially on the CIP side with the CIP ERT. (it was noted that there may be some continued need in Canada beyond the utilization in the US).

Pain points on Align Working Papers were discussed, including the cumbersome formatting and inability to paste tables and formatting. A representative from TRE indicated that they are sensitive to industry's efficiency issues as well, and that is being considered. It was also noted that they are working to get the RSAWs for new/modified standards out more quickly.

The following illustration was shown to provide more insight on CMEP participation in the Standards Development process:
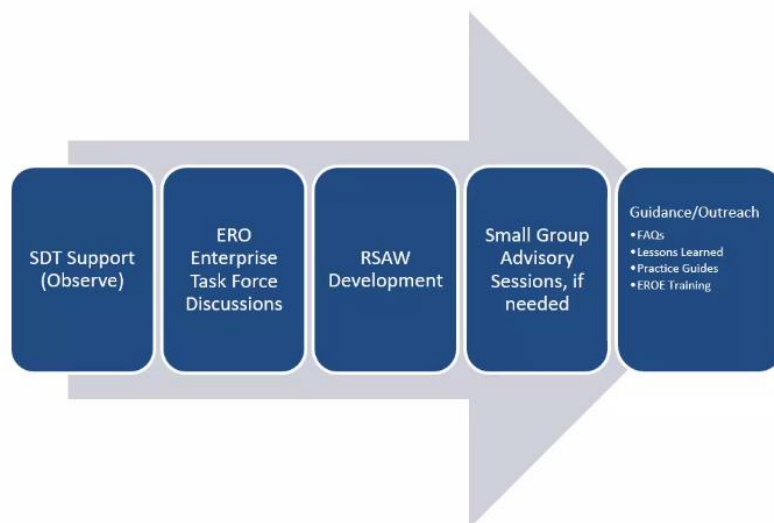
Observation: It was explained that CMEP staff observes the standards development process, and specifically that they sit in and try to make sure that a standard is enforceable and that they also start crafting the RSAW based on SDT.

ERO Task Force Discussions: With respect to the ERO Task Force, this is a place where they can have discussions on potential gaps or questions on the enforceability of the standard. This would inform comments back to the drafting teams. MRO mentioned the NSRF that meets every week.

RSAW Development: Next is the formal development of the RSAW. The RSAW should be distributed with the final ballot and then from there the final version can be developed.

Small Group Advisory Sessions: These sessions have been found to be really beneficial on the CIP side. NERC is trying to ramp those up for the O&P side as well for the new standards that are coming. These can be regional as well as NERC-wide.that are answering questions. It was explained that they try to have them before the effective date of the standards and also that they try to compile the FAQs so people can see the EROs stance on some of those questions. This is a chance to get everyone on the same page and have access to the same information. NERC noted that they can also have sessions after the effective date if they start to see issues.

Guidance/Outreach: This is the time that the ERO may document an audit approach that may come out of the small group advisory sessions. It may also impact training as well.

A question was raised noting that it seems that there is sometimes a disconnect between the Standards and Implementation Guidance. Lonnie thinks that the small group sessions do help. He then posed the question to ERO if they are seeing is less concerns in audits following the sessions. TRE indicated that there is often both clarity but also more questions. There were also questions on the industry's awareness of small group sessions and their creation, and whether a lot of people know about them. Lonnie said they are advertised a lot and some regions even contact their entities. He noted that communication has improved over time and that as people have seen value the participation has also increased. Lonnie also explained that small group for virtualization will likely be broken up since so many standards are touched.

There were additional comments about the RSAW/Align working paper and the request was made for a consistent template. The trouble with using both is that Align is not accessible unless you are in an audit, so the working papers are not available outside of that time. It was stated that the consistent template does not have to specifically be an RSAW, but it should be something that is both consistent and accessible. The same frustration was expressed with other submissions (example section 800 data submissions). In those instances as well because there is no template or list of questions, it is difficult to know what the next question is going to be and to make sure you are prepared to respond accordingly.

Future CCC Meeting Dates:

April 30 – May 2, 2024: Little Rock, AR – SPP

July 23 – 25, 2024: Folsom, CA – CAISO

October 15 – 17, 2024: Atlanta, GA – NERC Offices

Report- NERC Standards Committee (SC)

- The SC meets on a monthly basis. Webex meetings are held in months when there is no quarterly hybrid meeting. The report below contains highlights and items of note from several meetings held in Q4 2023 and Q1 2024. A link to the full meeting minutes can be found below.
- **General items of note from the SC chair included**:
  - There continues to be a significant number of projects on the SC agenda; all progressing through their various phases of development, others are SARs for new projects. NERC staff has been utilizing the prioritization criteria that was established for each project prior to its issuance to the SC. NERC staff also explained the first six months of project work for the SC and industry will be dedicated to only those projects that have been identified as High priority.
- The committee reviewed the NERC Project Tracking spreadsheet and shared the status of Reliability Standards Projects under Development.
- Standards Committee Executive Committee members were appointed for a new term.

Projects moving to subsequent development phase:

Project 2021-03 CIP-002

Authorized the appointment of supplemental Standard Drafting Team (SDT) members

Project 2023-05 Modifications to FAC-001 and FAC-002

Appointed chair, vice chair, and members to the Project 2023-05 Modifications to FAC-001 and FAC-002 Drafting Team (DT)

Project 2020-02 Modifications to PRC-024 (Generator Ride-through) Waiver

- Approved waiver to reduce Initial formal comment and ballot period from 45 calendar days to as few as 25 calendar days, with ballot pools formed in the first 10 days.
- Additional formal comment and ballot period(s) reduced from 45 calendar days to as few as 15 calendar days, with ballot conducted during the last 10 days of the comment period.
- Final ballot reduced from 10 calendar days to as few as five calendar days

Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination

Approved the following waiver of provisions of the (SPM):

- Additional formal comment and ballot period(s) reduced from 45 calendar days to as few as 10 calendar days, with ballot(s) conducted during the last five days of the comment period

Project 2023-07 Transmission System Planning Performance Requirements for Extreme Weather

- Approved the following waiver of provisions of the Standard Processes Manual (SPM)

- Initial formal comment and ballot period reduced from 45 calendar days to as few as 25 calendar days, with ballot pools formed in the first 10 days.
- Additional formal comment and ballot period(s) reduced from 45 calendar days to as few as 15 calendar days, with ballot(s) conducted during the last 10 days of the comment period.
- Final ballot reduced from 10 calendar days to as few as five calendar days.

Project 2023-03 Internal Network Security Monitoring

Authorized initial posting of proposed Reliability Standard CIP-007-X and the associated Implementation Plan for a 35-day formal comment period, with ballot pool formed in the first 20 days and parallel initial ballots and non-binding polls on the Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs), conducted during the last 10 days of the comment period.

New SARs presented to the SC:

Transmission Planning Energy Scenarios Standard Authorization Request

Accepted the SAR, authorized posting of the SAR for a 30- day formal comment period; and authorized solicitation of the drafting team (DT) members.

Risk Management for Third-Party Cloud Services Standard Authorization Request

Accepted the SAR, authorized posting of the SAR for a 30- day formal comment period; and authorized solicitation of the drafting team (DT) members.

Project posting schedule and Project tracking spreadsheet

NERC Project Tracking Spreadsheet

NERC Project Posting Schedule

Standards Committee Meeting minutes

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

NERC SC Project Management and Oversight Subcommittee (PMOS) Update

Terri Pyle
February 13, 2024

Purpose

The Project Management and Oversight Subcommittee (PMOS) is a subcommittee that reports to the NERC Standards Committee. The PMOS works with NERC staff to support industry SMEs in all aspects of standard development. This includes advising and supporting the SDTs, periodic review teams, and special projects to achieve standard goals specified in the Reliability Standards Development Plan. The PMOS meets monthly prior to the Standards Committee meeting.

PMOS Scope document

*IMPORTANT NOTE:

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 has established a prioritization system, Standards Prioritization, December 2023, to account for this. (see slide deck provided)

Reliability Standards Under Development (link)

Reliability Standards Under Development	
High Priority - Completed by 2024	**Ballot Status**
2016-02 Modifications to CIP Standards - CIP-002, CIP-003, CIP-004, CIP-005, CIP-006, CIP-007, CIP-008, CIP-009, CIP-010, CIP-011, CIP-012-1	CIP-003-9, CIP-004-7, CIP-005-8, CIP-007-7, CIP-010-5 Ballot: 11/20-11/29/2023 - all Passed
2020-02 Modifications to PRC-024 (Generator Ride-through)*	
2021-03 CIP-002	CIP-002-Y Ballot: 10/31-11/9/2023 - 33%
2021-04 Modifications to PRC-002-2*	
2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination	EOP-012-2 Final Ballot: 2/5-2/9/2024 - Passed 82% Ballot: 1/16-1/22/2024 - 81% Ballot: 11/21-11/30/2023 - 59% Ballot: 7/11-7/20/2023 - 43%
2022-03 Energy Assurance with Energy-Constrained Resources	Ballot: 3/1 - 3/11
2023-02 Analysis and Mitigation of BES Inverter-Based Resource Performance Issues*	
2023-03 Internal Network Security Monitoring (INSM)	CIP-007-x Ballot: 1/8-1/17/2024 - 15%
2023-04 Modifications to CIP-003	CIP-003-9 Ballot: 3/5 - 3/14
2023-06 CIP-014 Risk Assessment Refinement	
2023-07 Transmission System Planning Performance Requirements for Extreme Weather	
Medium Priority - Completed By 2025 and Beyond	**Status**
2020-06 Verifications of Models and Data for Generators*	IBR Definitions Ballot: 12/29/2023-1/9/2024 - 44%
2021-01 Modifications to MOD-025 and PRC-019*	
2023-01 EOP-004 IBR Event Reporting*	
Low Priority	**Status**
2017-01 Modifications to BAL-003 Phase II	
2019-04 Modifications to PRC-005-6	
2021-02 Modifications to VAR-002-4.1*	VAR-002-4.1 Ballot: 10/27-11/6/2023 - 62%
2021-08 Modifications to FAC-008	
2022-01 Reporting ACE Definition and Associated Terms	Various New and Modified Definitions Various Ballot Dates - Passed
2022-02 Modifications to TPL-001-5.1 and MOD-032-1*	MOD-032-2 Ballot: 11/10-11/20/2023 - 40%
2022-04 EMT Modeling*	
2022-05 Modifications to CIP-008 Reporting Threshold	
2023-05 Modifications to FAC-001 and FAC-002 *	
2023-08 Modifications of MOD-031 Demand and Energy Data	

High Priority

- 11 high priority projects after reprioritization

- Anticipated SARs to address FERC order 901

  ▪ Working with Engineering Department and SPIDERWG and to make sure all aspects of order covered

  ▪ Any identified areas missing will have a new SAR written

- 2024 Board adoption dates

  ▪ Feb 2024 – Cold Weather

  ▪ May 2024 – Internal Network, Security Monitoring and Virtualization

  ▪ Oct 2024 – IBR performance and disturbance monitoring projects related to FERC Order 901

  ▪ Dec 2024 – Extreme Weather and any remaining high priority projects

RELIABILITY | RESILIENCE | SECURITY

High Priority

Completed By the End of 2024		
2020-02 Modifications to PRC-024 (generator ride-through)	2021-03 Modifications to CIP-002 (TOCC)	2021-07 Extreme Cold Weather
2021-04 Modifications to PRC-002 (data sharing)	2016-02 Virtualization	2023-07 TPL-001 Extreme Weather
2023-02 Performance of IBRs	2023-03 Internal Network Security Monitoring	2022-03 Energy Assurance (Operations)
	2023-04 CIP-003 Low Impact Criteria	
	2023-06 Physical Security	

RELIABILITY | RESILIENCE | SECURITY

Medium and Low Priority

- 13 medium and low priority projects
- Will not post for formal comment/ballot in first half of 2024
  - ▪ Only informal postings to solicit feedback during this time
  - ▪ Allow industry to focus on postings for high priority projects
- Projects to be reevaluated following conclusion of high priority projects
- Anticipated 2025 Board Adoption Dates AND Beyond

RELIABILITY | RESILIENCE | SECURITY

Medium Priority

Completed By 2025 and Beyond		
2022-05 CIP-008 Reporting Threshold	2020-06 Verification of Model and Data for Generators	2021-01 Verification and data reporting for active and reactive power
	2023-01 EOP-004 IBR Event Reporting	

RELIABILITY | RESILIENCE | SECURITY

Low Priority

Completed By 2025 and Beyond		
2017-01 Modifications to BAL-003-1.1	2019-04 Modifications to PRC-005-6	2021-02 Modifications to VAR-002-4.1
2021-08 Modifications to FAC-008	2022-01 Reporting ACE Definition and Associated Terms	2022-02 MOD-032, TPL-001 Footnote 13d
2022-04 EMT Models in NERC MOD, TPL, FAC Standards	2023-05 FAC-001/FAC-002 DER	2023-08 MOD-031 Demand and Energy

RELIABILITY | RESILIENCE | SECURITY

Other Projects

- 1 Cloud SAR (Accepted at the December 2023 SC Meeting)

- SARs also submitted by feedback loops are expected

- 5 SARs on the horizon being drafted by Engineering and RSTC working groups

RELIABILITY | RESILIENCE | SECURITY

Questions and Answers

RELIABILITY | RESILIENCE | SECURITY

Projected Posting Schedule

Click here for the [Standards Balloting and Commenting Page](#)
Click here for the [Standards Balloting and Commenting System (SBS)](#)

Week of February 12
2023-01 EOP-004 IBR Event Reporting

- Informal comment period

Week of February 19
2020-06 Verification of Models and Data for Generators (IBR definitions)

- Formal comment period and additional ballot

Week of February 26: None at this time

Week of March 4: None at this time

Week of March 11: None at this time

Week of March 18
2023-07 Transmission System Planning Performance Requirements for Extreme Weather

- Formal comment period and initial ballot

Note: the dates in this schedule are estimates and are subject to change.

RELIABILITY | RESILIENCE | SECURITY

	2/12	2/19	2/26	3/4	3/11	3/18	Closing Date
2016-02 Modifications to CIP Standards | Virtualization							
2017-01 Modifications to BAL-003-1.1							
2019-04 Modifications to PRC-005-6							
2020-02 Modifications to PRC-024 (Generator Ride-through)							
2020-06 Verifications of Models and Data for Generators IBR Definitions		2/22					
2021-01 Modifications to MOD-025 and PRC-019							
2021-02 Modifications to VAR-002							
2021-03 CIP-002							
2021-04 Modifications to PRC-002 Phase 2							
2021-07 Extreme Cold Weather | Phase 2 | EOP-012	Closes 2/14						
2021-08 Modifications to FAC-008							
2022-02 Modifications to MOD-032 and TPL-001							
2022-03 Energy Assurance with Energy-Constrained Resources					3/11		
2022-04 EMT Modeling							
2022-05 Modifications to CIP-008							
2023-01 EOP-004 IBR Event Reporting	2/12						3/27
2023-02 PRC-004 IBR Performance							
2023-03 Internal Network Security Monitoring (INSM)							
2023-04 Modifications to CIP-003					3/14		
2023-05 Modifications to FAC-001 and FAC-002							
2023-06 CIP-014 Risk Assessment Refinement							
2023-07 Transmission System Planning Performance Requirements for Extreme Weather						3/20	
2023-08 MOD-031							

	Informal comment period
	Formal comment period
	Nomination solicitation
	Comment period and initial/additional ballot/non-binding poll
	Final ballot
	Survey/feedback solicitation

NERC Facility Ratings Task Force (FRTF) Report
February 9, 2024

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
- September 15, 2023
- November 17, 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

Highlights from the **September 15, 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
    - Meeting monthly
    - Maintaining alignment with parallel FAC-008 initiatives
    - On track for document submittal to RSTC in December followed by ERO Enterprise CMEP staff for endorsement of this example (meaning ERO

deference to this example document when conducting compliance monitoring activities). It is understood that compliance determinations depend on facts, circumstances, and system configurations.
- Aligning with Work Plan Item 2 terminology
  - o Work Plan Item 2 - Support Project 2021-08 Modifications to FAC-008 SDT
    - Meeting every 2 weeks
    - Shared examples of clarifications of how to define a facility, key terms like Element (replace with Electrical Equipment), Thermal Rating (replace with Facility Rating), Emergency Rating, Facility Rating, Equipment Rating, Normal Rating, and Limiting Element (replace with Most Limiting Equipment).
    - Submitting comments to FAC-008 SDT
  - o 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
    - Document is in review and edit mode
    - After the RSTC summit (week of 10/9) the team will re-engage to work towards progress and completion timelines
    - Next meeting TBD
- Ben Wu (transitioning to Al McMeekin) gave an update to Project 2021-08 (Modifications to FAC-008)
  - o 9/5 draft out for comment, comments due 10/19
  - o 10/2 webinar for questions
- Future full team meetings:
  - o November 17, 2023 | 1:00 - 3:00 p.m. Eastern

Highlights from the **November 17, 2023** full team meeting:
- 2023 work plan updates:
  - o Work Plan Item 1 – Implementation Guideline - Sustaining Accurate Facility Ratings
    - Meeting monthly
    - Aligning with parallel initiatives for consistent FAC-008 messaging
    - Needs fill FRTF review, then to STC for endorsement (targeting March), then to CMEP for endorsement
      - Endorsement of examples mean ERO CMEP staff will give these examples deference when conducting compliance monitoring activities; registered entities have reasonable assurance for compliance requirements being met, understanding that each compliance determination is based on context (facts, circumstances, and system configurations).
    - Aligned with FAC-008-5, not -6 (in-progress, may go in to 2026)
  - o Work Plan Item 2 - Support Project 2021-08 Modifications to FAC-008 SDT
    - A lot of work Jul-Sept 2023
    - FRTF sub-team participated in industry review meeting
    - FAC-008-6 draft was rejected
    - FRTF sub-team participated in-person with SDT 11/6-11/7
    - Work continues (12/6/23, 1/10/24 meetings)
  - o Work Plan Item 3 - Whitepaper on Sampling for Facility Rating programs
    - Working on transitioning doc to final format (some bullet point sections)
    - Next meetings: 12/12/2023, 2/20/2024

- Still trying to get to RSTC in March (full FRTF first)
- FAC-008 project 2021-08
  - Only 28.8% approval rating, needed 66.7%
  - 12/6 and 1/10 meetings
- Future full team meetings:
  - March 15, 2024 | 1:00 - 3:00 p.m. Eastern
  - May 17, 2024 | 1:00 - 3:00 p.m. Eastern
  - July 19, 2024 | 1:00 - 3:00 p.m. Eastern
  - September 20, 2024 | 1:00 - 3:00 p.m. Eastern
  - November 15, 2024 | 1:00 - 3:00 p.m. Eastern

First Quarter 2024 Report
Dane Rogers, OG&E, Chair
Bobbi Welch, MISO, Vice Chair

I.   General

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

➤ **Year to Date:**

- NSRF Meeting Held: 5/6 possible.

- NSRF Member & Guest Meeting Attendance, average per week: 93

- NSRF Member Attendance, average per week: 67%
  - o   Highest Member Attendance since January 2022: 94% (08-02-2023)

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: 9
  - o   Average 2 per week.

- Total NSRF Comments Submitted: 3

- Total NSRF Voting Recommendations Made: 9

➤ **Q1 Activity:**

- Project 2020-06 – Verifications of Models and Data for Generators | Draft 1 of IBR Definitions
  - o   Group discussion.
  - o   Submitted comments.
  - o   Made balloting recommendations.
  - o   NERC Project Developer presented material.

- Project 2023-03 - Internal Network Security Monitoring (INSM)
  - ○ SDT member presented material.
  - ○ Group discussion.
  - ○ Submitted comments.
  - ○ Made balloting recommendations.

- Project 2021-07 – Extreme Cold Weather Grid Operations, Preparedness, and Coordination – Phase 2 | EOP-012-2 Draft 3
  - ○ Group discussion.
  - ○ Submitted comments.
  - ○ Made balloting recommendation.

- Project 2023-04 - Modifications to CIP-003 | Draft 2
  - ○ SDT member presented material.
  - ○ Group discussion.

- Project 2022-03 - Project 2022-03 – Energy Assurance with Energy-Constrained Resources | Draft 1
  - ○ Group discussion.

III. Emerging Challenges, Risks & Opportunities

- None

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

- None

V. Other

- MRO NSRF Membership 2024
  - ○ New Chair, Dane Rogers, OG&E and Vice Chair Bobbi Welch, MISO.
  - ○ New Member seated Peter Brown, Invenergy.
  - ○ 4 member seats vacant.

MRO CMEP Advisory Council
SPP RCAG Report
February 20, 2024

SPP Reliability Compliance Advisory Group 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 January 8, 2024, via WebEx. Meeting minutes are available on the SPP.org website. Topics from RCAG meetings since the last report included: discussion of a SPP Revision Request clarifying what the expectation should be with resource availability for the summer and winter seasons. This revision request addresses FERC's concerns in their September 2023 Order by making proposed Tariff revisions to Section 4 at Attachment AA. The RCAG Charter and Rosters were reviewed. Discussion also took place relating to election of the Chair and Vice Chair for the RCAG.

The next SPP RCAG is scheduled to be held virtually on March 11, 2024, at 1 pm.

Respectfully Submitted,
Mark E. Buchholz - Western Area Power Administration

Standing Reports
Mid-Continent Compliance Forum (MCCF)
Larry Heckert, MCCF Board of Directors

Report
The Mid-Continent Compliance Forum (MCCF) provides Registered Entities in the MRO footprint 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 virtually on a monthly basis.

The MCCF Board of Directors last met on January 17, 2024, via WebEx. Recent meetings centered around finalization of numerous items for the 2024 MCCF Winter Forum scheduled for February 15th from 1:00 to 5:00pm. The final agenda for the virtual Winter forum includes the following:
- FERC Order 881 – Ambient Adjusted Ratings
- CIP-003 Security Management Controls Low Impact
- Audit Experiences (OG&E, GRE, Western Farmers, Xcel)
- Round Table Discussion

Additionally, the Board of Directors is coordinating arrangements for the 2024 MCCF Summer Forum, to be held on July 25th in Kansas City. The hybrid event will be immediately following the MRO CMEP Offsite Conference and will be held at same venue. The agenda for the Summer Forum will be determined at a later date.

The next MCCF Board of Directors Meeting is scheduled for February 22, 2024, via WebEx.

2023 Annual Stakeholder Survey Results
Terri Pyle, CMEPAC Chair
Tiffany Lake, CMEPAC Vice Chair
Ashley Stringer, Manager NERC Compliance Risk and Controls, Oklahoma Gas and Electric, CMEPAC Member

Action
Discussion

Report
The results of the 2023 Annual Stakeholder Survey will be presented and discussed during the meeting. Results will begin on the next page.

CLARITY
Outreach & Engagement

ASSURANCE
Oversight & Risk Management

RESULTS
Reliability Performance

CMEP AC Initiative
2023 Annual Stakeholder Survey Results

2024 Q1 CMEP AC Status Update
Terri Pyle, OG&E

CLARITY | ASSURANCE | RESULTS

Public

2023 Annual Stakeholder Survey

- **Purpose**
  - Request, collect, and report feedback from the compliance contacts in the MRO region The feedback will assist the MRO CMEP AC in achieving the following:
    - Identify training objectives, goals, and priorities for the MRO CMEP AC
    - Provide input to MRO staff on content for upcoming conferences or other training event
    - Provide support to the MRO Board of Directors, other MRO stakeholder committees, and MRO staff in pursuit of MRO's strategic objectives

- **2023 Annual Survey Project Team**
  - Ashley Stringer, OG&E
  - Michelle Olson, MRO
  - Terri Pyle, OG&E
  - Tiffany Lake, Evergy

Q1 The responses in this survey represent the following:

Answered: 21　　Skipped: 0
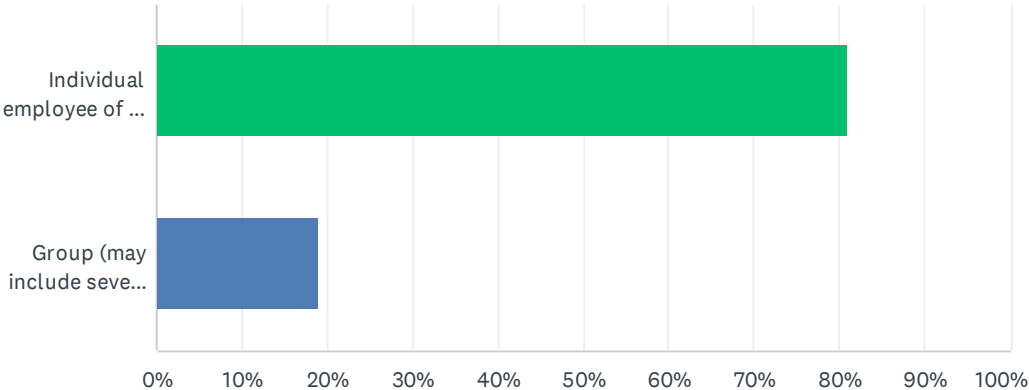
ANSWER CHOICES	RESPONSES	
Individual employee of the company	80.95%	17
Group (may include several business units) of the company	19.05%	4
TOTAL		21

Q2 How many years of NERC compliance experience do you have?

Answered: 18   Skipped: 3
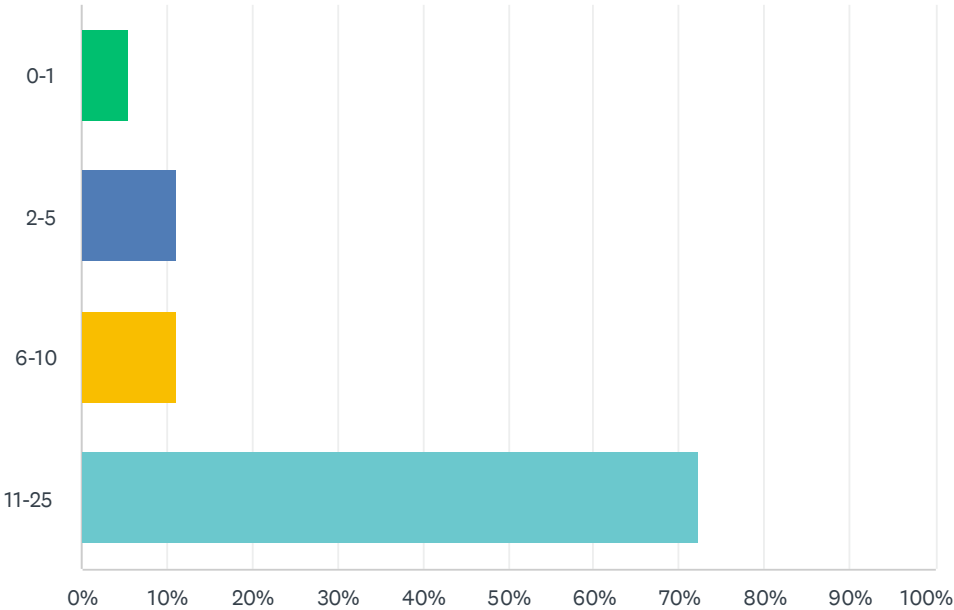
ANSWER CHOICES	RESPONSES	
0-1	5.56%	1
2-5	11.11%	2
6-10	11.11%	2
11-25	72.22%	13
TOTAL		18

Q3 Select the NERC registered functions for your organization

Answered: 21   Skipped: 0
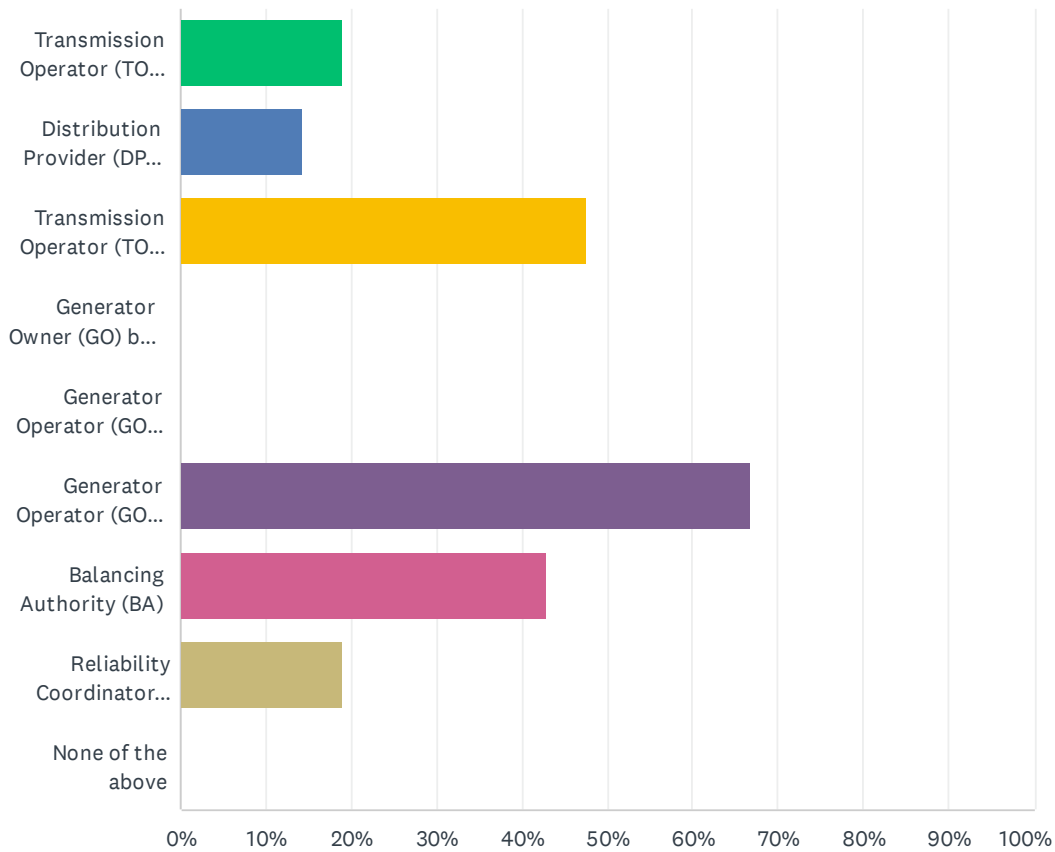
ANSWER CHOICES	RESPONSES	
Transmission Operator (TOP) but not Distribution Provider (DP)	19.05%	4
Distribution Provider (DP) but not Transmission Operator (TOP)	14.29%	3
Transmission Operator (TOP) and Distribution Provider (DP)	47.62%	10
Generator Owner (GO) but not Generator Operator (GOP)	0.00%	0
Generator Operator (GOP) but not Generator Owner (GO)	0.00%	0
Generator Operator (GOP) and Generator Owner (GO)	66.67%	14
Balancing Authority (BA)	42.86%	9
Reliability Coordinator (RC)	19.05%	4
None of the above	0.00%	0
Total Respondents: 21		

Q4 Which sector does your organization represent?

Answered: 21   Skipped: 0
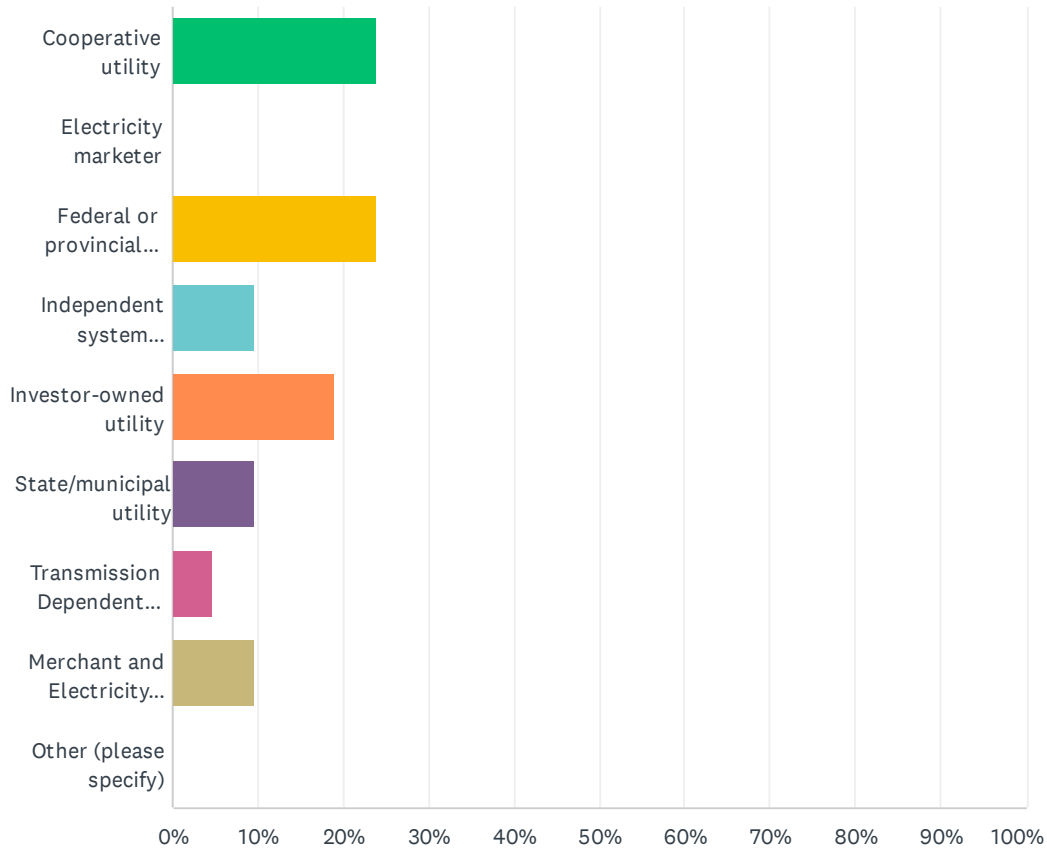
ANSWER CHOICES	RESPONSES	
Cooperative utility	23.81%	5
Electricity marketer	0.00%	0
Federal or provincial utility/Federal Power Marketing Administration	23.81%	5
Independent system operator/regional transmission organization	9.52%	2
Investor-owned utility	19.05%	4
State/municipal utility	9.52%	2
Transmission Dependent Utility (TDU)	4.76%	1
Merchant and Electricity Generator	9.52%	2
Other (please specify)	0.00%	0
TOTAL		21

Q5 How many are employed at your organization?

Answered: 21   Skipped: 0
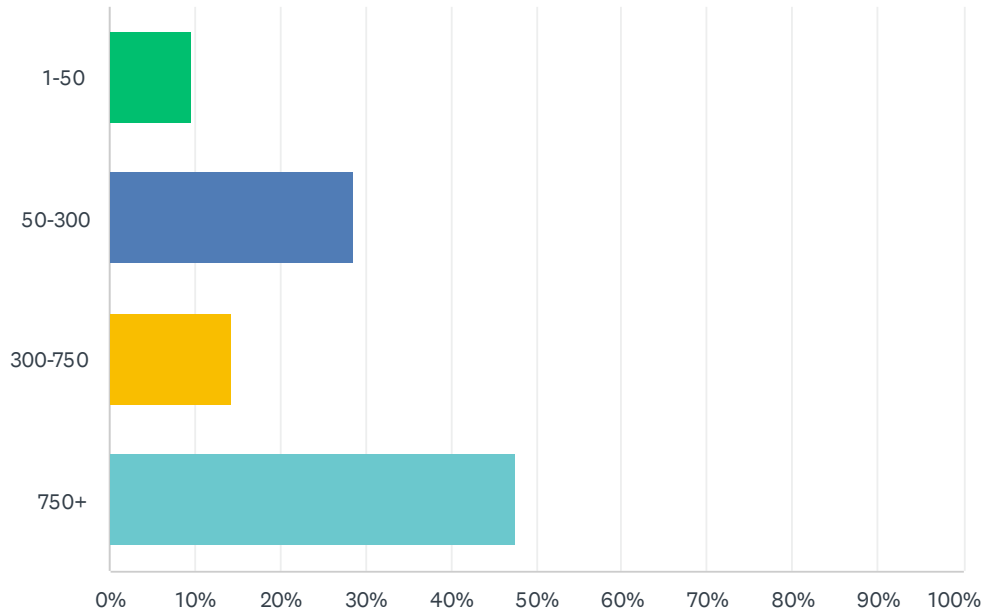
ANSWER CHOICES	RESPONSES	
1-50	9.52%	2
50-300	28.57%	6
300-750	14.29%	3
750+	47.62%	10
TOTAL		21

Q6 One of the CMEPAC's key objectives is to develop a Highly Effective Reliability Organization (HERO) outreach effort to help registered entities assess and improve their own compliance and reliability practices. To help determine where more outreach is most needed, please rate your perceived understanding of the following HEROs characteristics:

Answered: 21   Skipped: 0
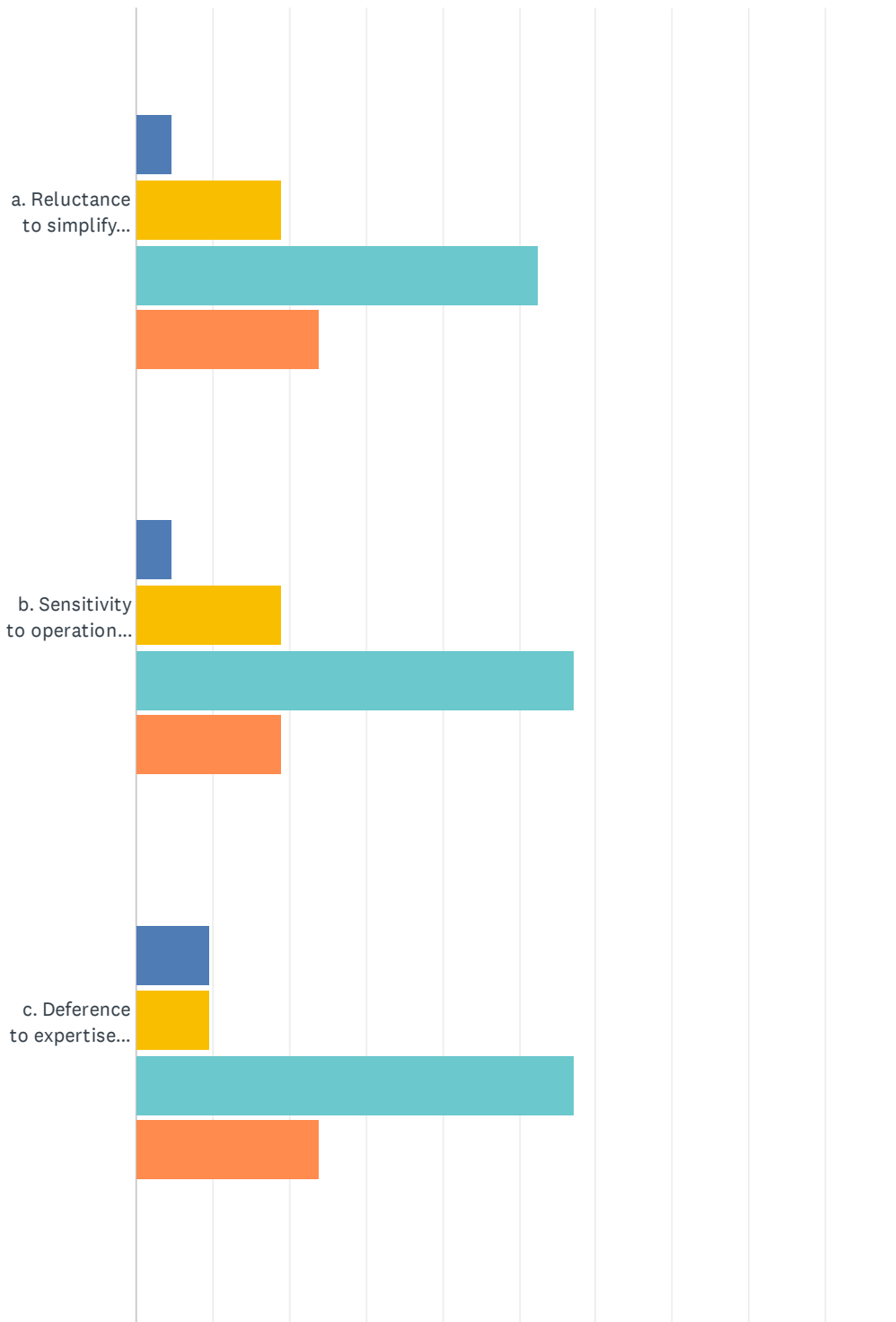
2023 CMEPAC Annual Survey
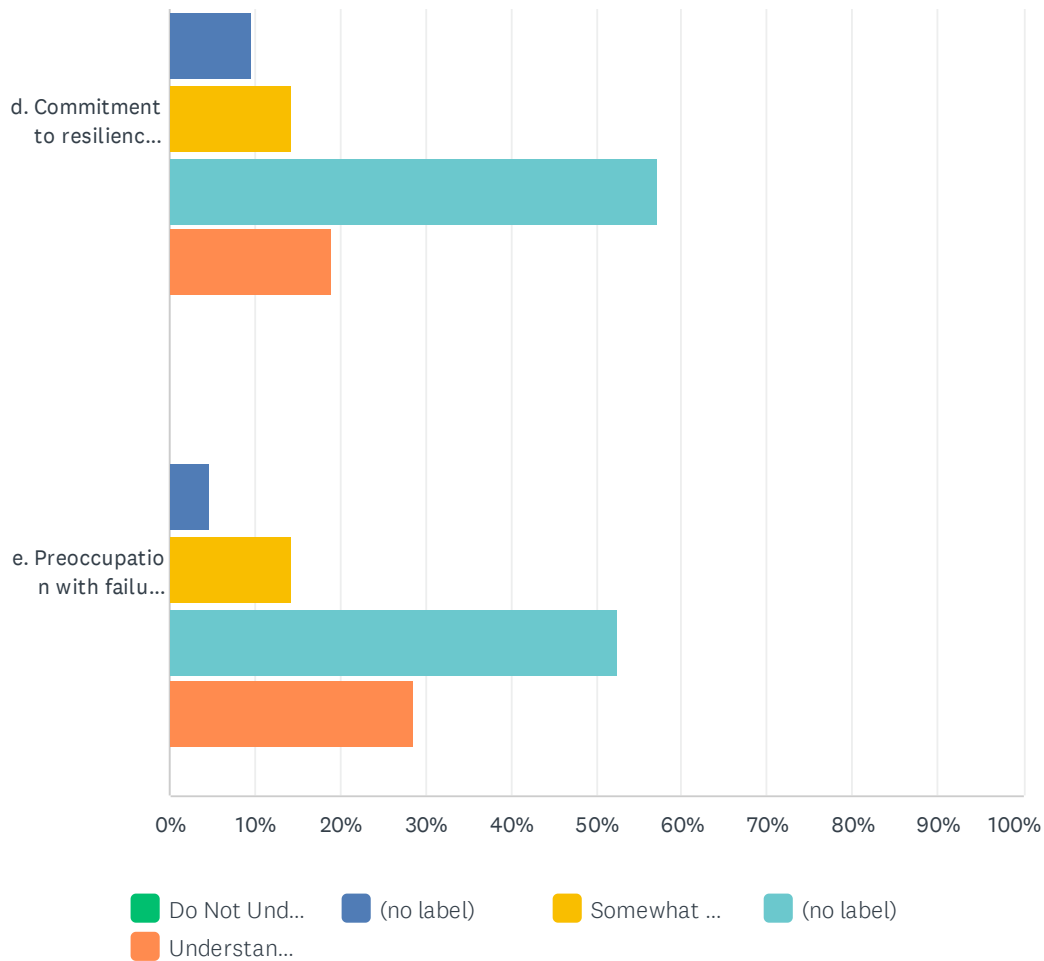
	DO NOT UNDERSTAND AT ALL	(NO LABEL)	SOMEWHAT UNDERSTANDING	(NO LABEL)	UNDERSTANDING COMPLETELY	TOTAL
a. Reluctance to simplify (ex: solid root cause analysis)	0.00% 0	4.76% 1	19.05% 4	52.38% 11	23.81% 5	21
b. Sensitivity to operations (ex: carefully designed change management practices)	0.00% 0	4.76% 1	19.05% 4	57.14% 12	19.05% 4	21
c. Deference to expertise (ex: authorities follow expertise)	0.00% 0	9.52% 2	9.52% 2	57.14% 12	23.81% 5	21
d. Commitment to resilience (ex: resources dedicated to corrective action plans and training)	0.00% 0	9.52% 2	14.29% 3	57.14% 12	19.05% 4	21
e. Preoccupation with failure (ex: attention to "close calls" and "near misses")	0.00% 0	4.76% 1	14.29% 3	52.38% 11	28.57% 6	21

Q7 Following are topics that have been discussed in the past, either at a conference, webinar, newsletter article, etc. How interested are you in additional discussion on the following topics?
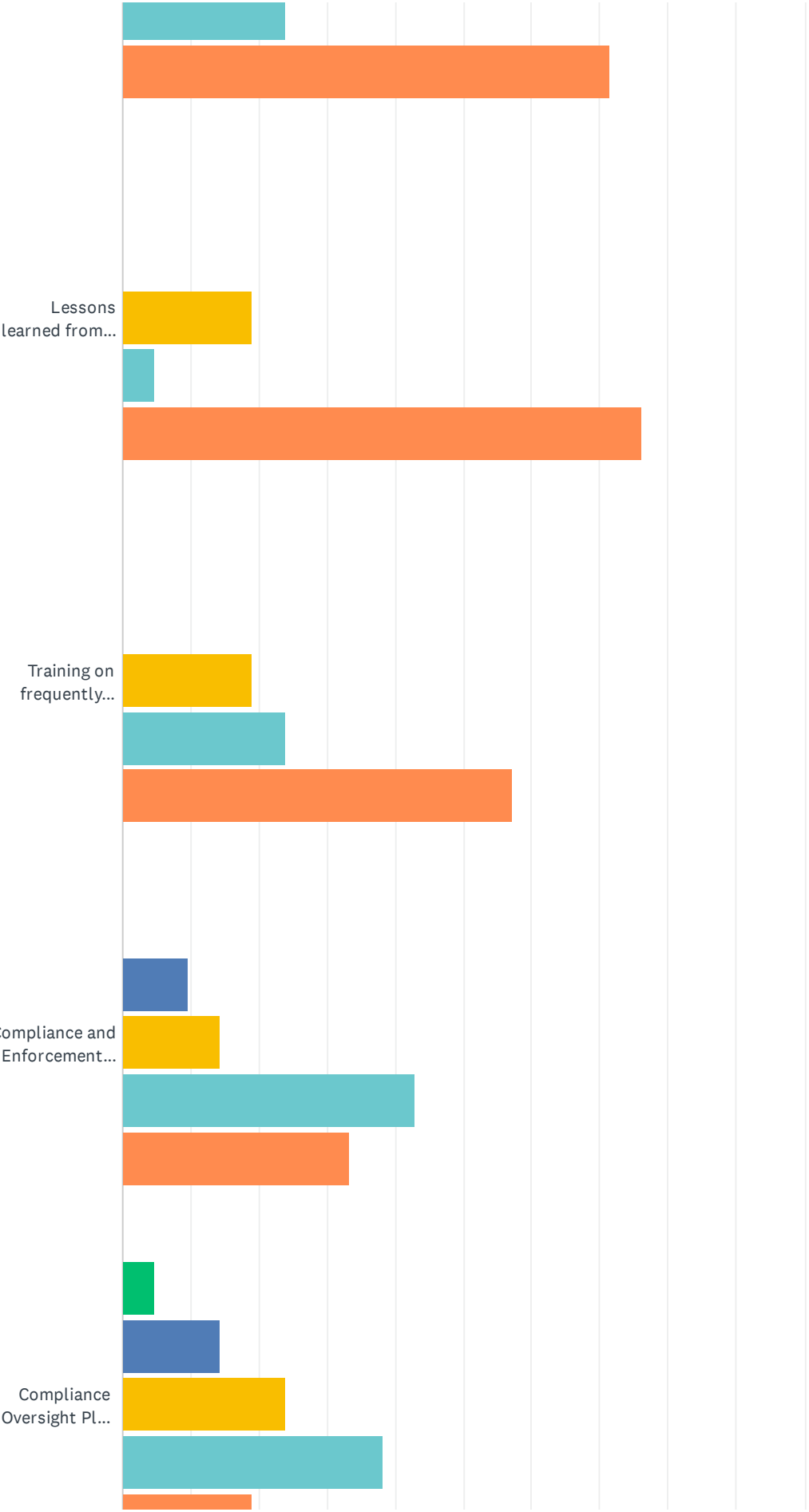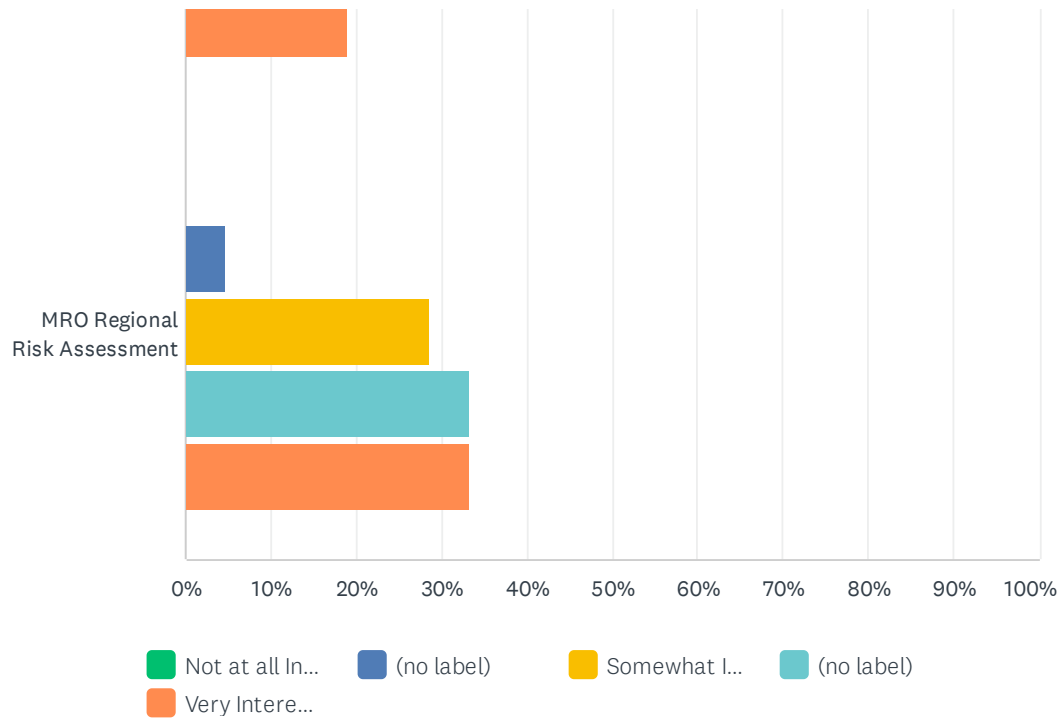
Answered: 21   Skipped: 0
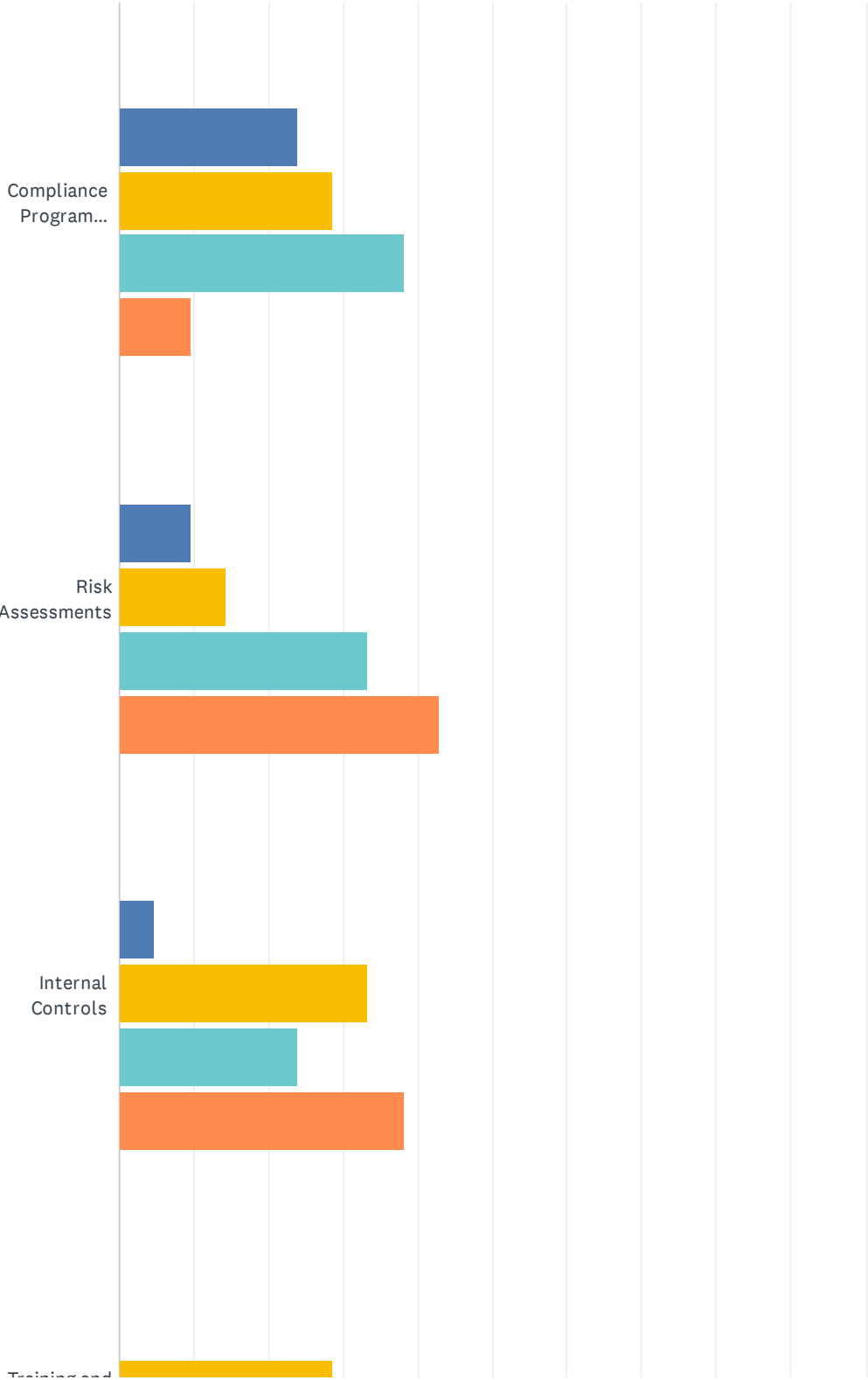
2023 CMEPAC Annual Survey

Lessons learned from...

Training on frequently...

Compliance and Enforcement...

Compliance Oversight Pl...

2023 CMEPAC Annual Survey

MRO Regional Risk Assessment
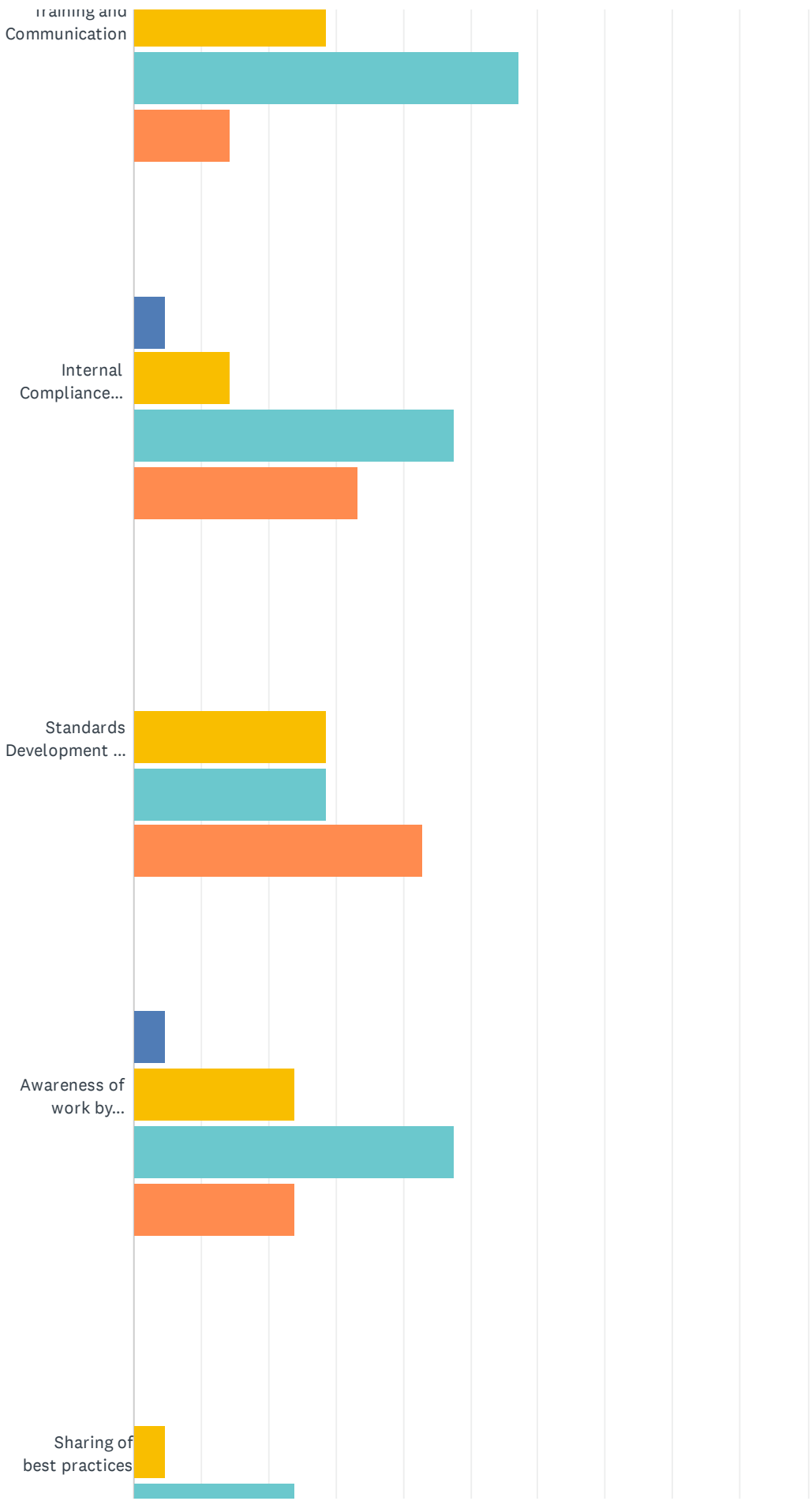
■ Not at all In...	■ (no label)	■ Somewhat I...	■ (no label)
■ Very Intere...		

	NOT AT ALL INTERESTED	(NO LABEL)	SOMEWHAT INTERESTED	(NO LABEL)	VERY INTERESTED	TOTAL
Compliance Program Governance/Structure	0.00% 0	23.81% 5	28.57% 6	38.10% 8	9.52% 2	21
Risk Assessments	0.00% 0	9.52% 2	14.29% 3	33.33% 7	42.86% 9	21
Internal Controls	0.00% 0	4.76% 1	33.33% 7	23.81% 5	38.10% 8	21
Training and Communication	0.00% 0	0.00% 0	28.57% 6	57.14% 12	14.29% 3	21
Internal Compliance Monitoring	0.00% 0	4.76% 1	14.29% 3	47.62% 10	33.33% 7	21
Standards Development and Readiness	0.00% 0	0.00% 0	28.57% 6	28.57% 6	42.86% 9	21
Awareness of work by industry, NERC, and other Regional Entity organizational groups	0.00% 0	4.76% 1	23.81% 5	47.62% 10	23.81% 5	21
Sharing of best practices	0.00% 0	0.00% 0	4.76% 1	23.81% 5	71.43% 15	21
Lessons learned from issues of non-compliance	0.00% 0	0.00% 0	19.05% 4	4.76% 1	76.19% 16	21
Training on frequently violated requirements	0.00% 0	0.00% 0	19.05% 4	23.81% 5	57.14% 12	21
Compliance and Enforcement Report	0.00% 0	9.52% 2	14.29% 3	42.86% 9	33.33% 7	21
Compliance Oversight Plan (COP)	4.76% 1	14.29% 3	23.81% 5	38.10% 8	19.05% 4	21
MRO Regional Risk Assessment	0.00% 0	4.76% 1	28.57% 6	33.33% 7	33.33% 7	21

Q8 A commonly requested topic is learning more about Internal Controls. What level of detail would you like to see regarding information on Internal Controls?
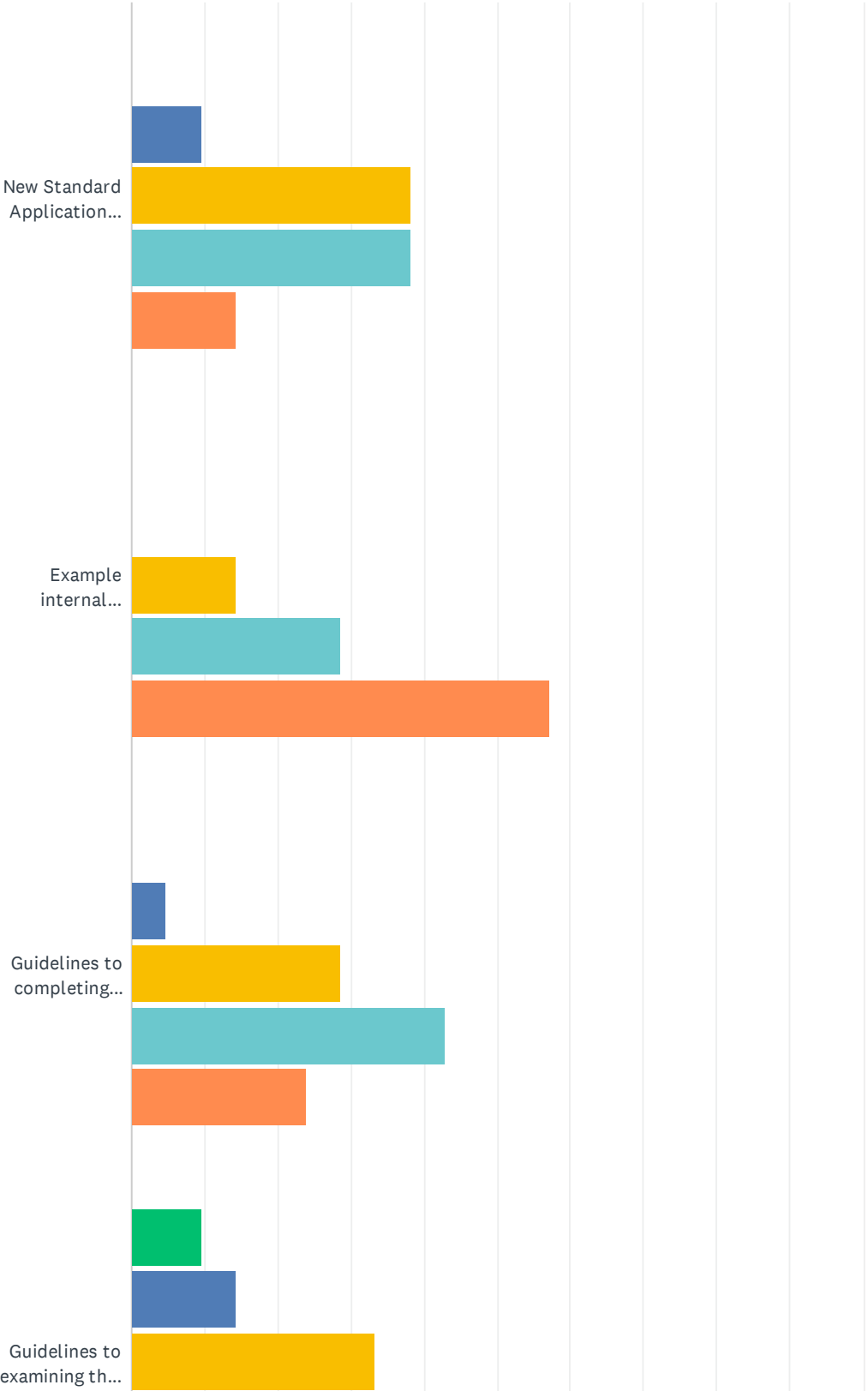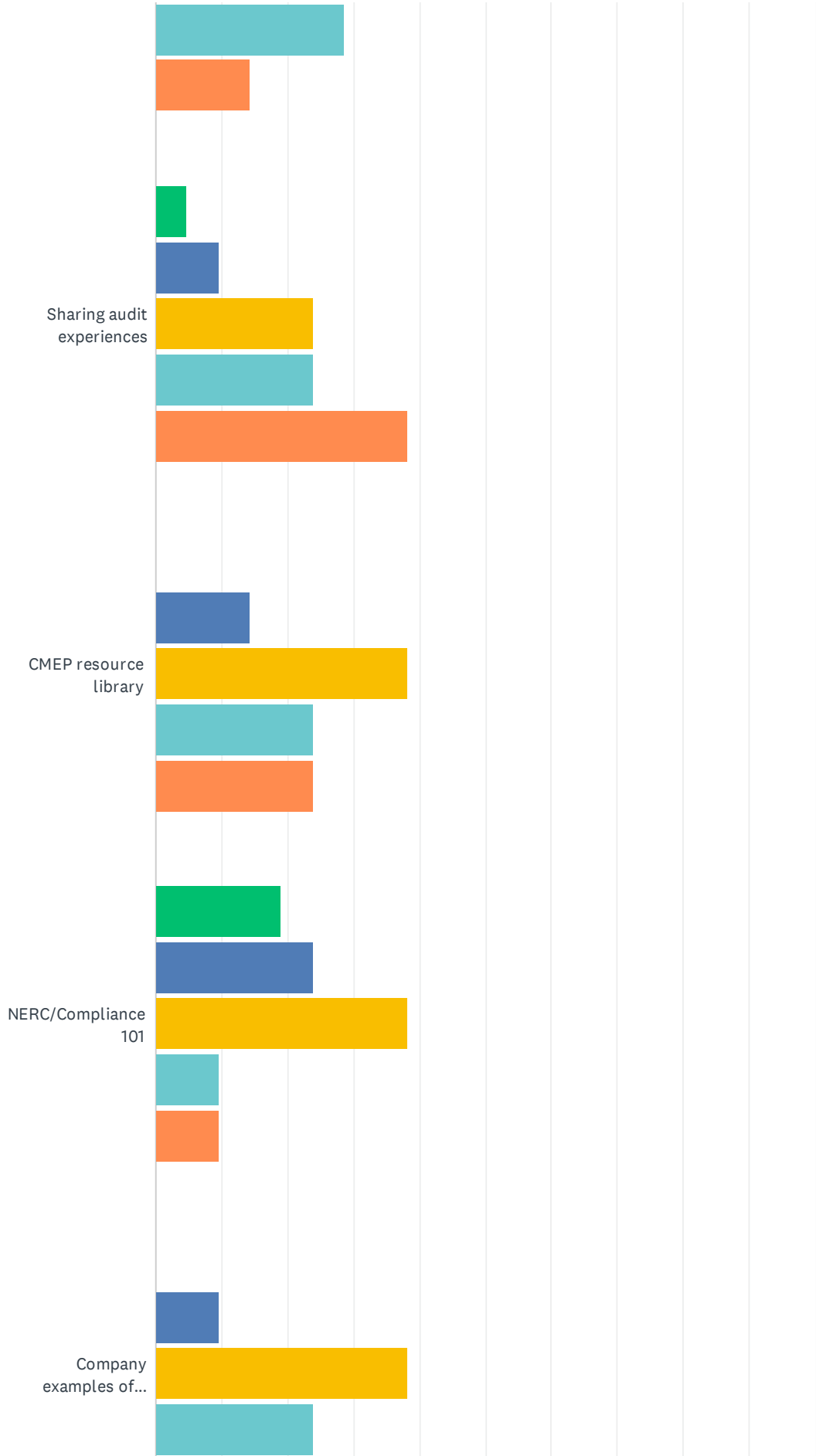
Answered: 20   Skipped: 1
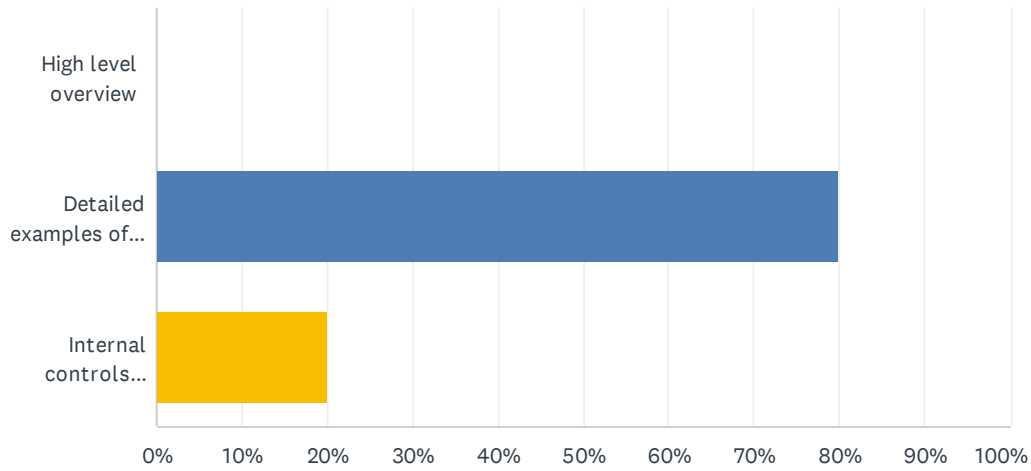
ANSWER CHOICES	RESPONSES	
High level overview	0.00%	0
Detailed examples of specific controls	80.00%	16
Internal controls programs	20.00%	4
TOTAL		20

Q9 The CMEPAC is finalizing its work plan for 2024. To help with work prioritization, which offerings would be of most value to your organization?
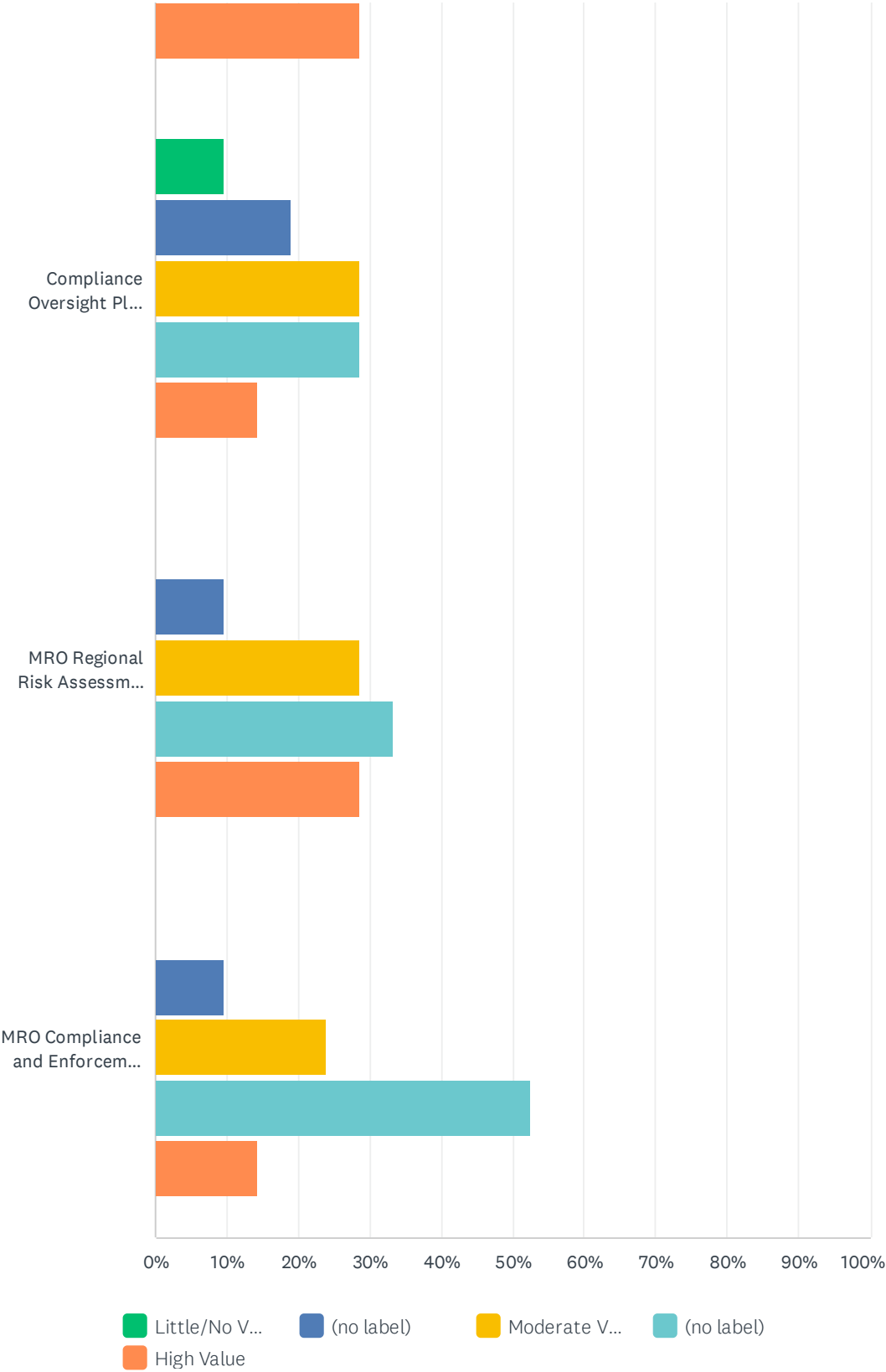
Answered: 21   Skipped: 0

2023 CMEPAC Annual Survey

Sharing audit experiences

CMEP resource library

NERC/Compliance 101

Company examples of...

2023 CMEPAC Annual Survey

Legend:
- Little/No V... (green)
- (no label) (blue)
- Moderate V... (yellow)
- (no label) (teal)
- High Value (orange)

Categories: Compliance Oversight Pl..., MRO Regional Risk Assessm..., MRO Compliance and Enforcem...

|	LITTLE/NO VALUE	(NO LABEL)	MODERATE VALUE	(NO LABEL)	HIGH VALUE	TOTAL
New Standard Application Guide: (please list in the comment section)	0.00% 0	9.52% 2	38.10% 8	38.10% 8	14.29% 3	21
Example internal controls from other registered entities	0.00% 0	0.00% 0	14.29% 3	28.57% 6	57.14% 12	21
Guidelines to completing quality risk determinations for self-logs and self-reports	0.00% 0	4.76% 1	28.57% 6	42.86% 9	23.81% 5	21
Guidelines to examining the concept of using the Event Analysis cause codes within CMEP processes	9.52% 2	14.29% 3	33.33% 7	28.57% 6	14.29% 3	21
Sharing audit experiences	4.76% 1	9.52% 2	23.81% 5	23.81% 5	38.10% 8	21
CMEP resource library	0.00% 0	14.29% 3	38.10% 8	23.81% 5	23.81% 5	21
NERC/Compliance 101	19.05% 4	23.81% 5	38.10% 8	9.52% 2	9.52% 2	21
Company examples of Risk Assessment and Risk Management Frameworks	0.00% 0	9.52% 2	38.10% 8	23.81% 5	28.57% 6	21
Compliance Oversight Plans (COP)	9.52% 2	19.05% 4	28.57% 6	28.57% 6	14.29% 3	21
MRO Regional Risk Assessment (RRA)	0.00% 0	9.52% 2	28.57% 6	33.33% 7	28.57% 6	21
MRO Compliance and Enforcement Report	0.00% 0	9.52% 2	23.81% 5	52.38% 11	14.29% 3	21
	LITTLE/NO VALUE	(NO LABEL)	MODERATE VALUE	(NO LABEL)	HIGH VALUE	TOTAL

Q10 If you would like to present a topic via webinar or at a conference, or write a newsletter article on behalf of the MRO CMEPAC, please provide your contact information and topic:
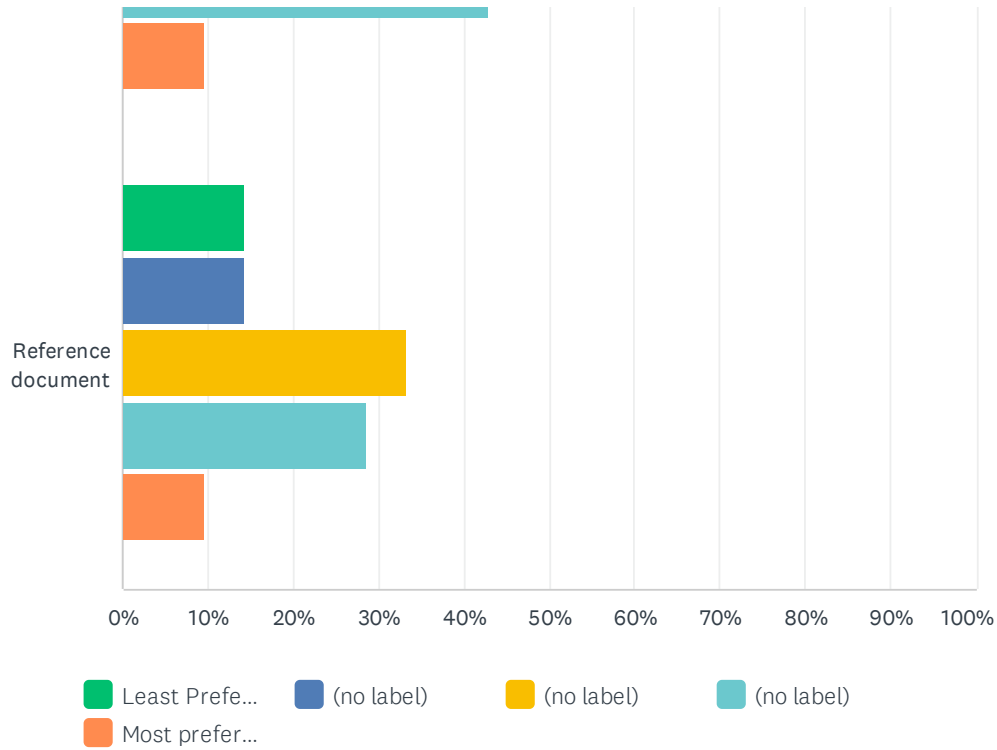
Answered: 1   Skipped: 20

ANSWER CHOICES	RESPONSES	
Name	100.00%	1
Company	100.00%	1
Email	100.00%	1
Phone Number	100.00%	1
Topic	100.00%	1

Q11 Rank your preferred format for receiving information from CMEPAC.

Answered: 21   Skipped: 0
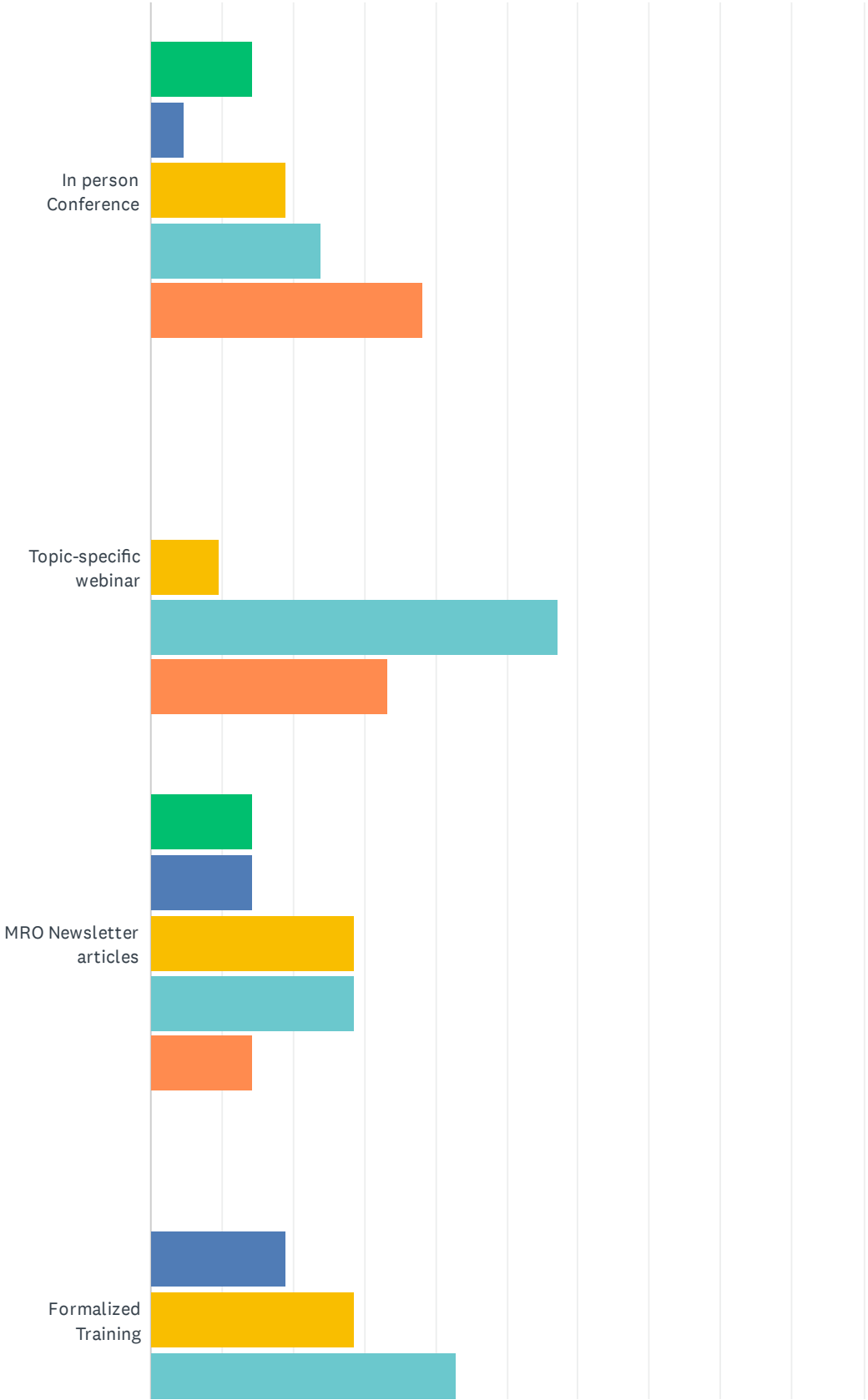
	LEAST PREFERRED	(NO LABEL)	(NO LABEL)	(NO LABEL)	MOST PREFERRED	TOTAL
In person Conference	14.29% 3	4.76% 1	19.05% 4	23.81% 5	38.10% 8	21
Topic-specific webinar	0.00% 0	0.00% 0	9.52% 2	57.14% 12	33.33% 7	21
MRO Newsletter articles	14.29% 3	14.29% 3	28.57% 6	28.57% 6	14.29% 3	21
Formalized Training	0.00% 0	19.05% 4	28.57% 6	42.86% 9	9.52% 2	21
Reference document	14.29% 3	14.29% 3	33.33% 7	28.57% 6	9.52% 2	21

Q12 Which of the following CMEPAC activities have you found to be helpful to you or your organization?

Answered: 21   Skipped: 0
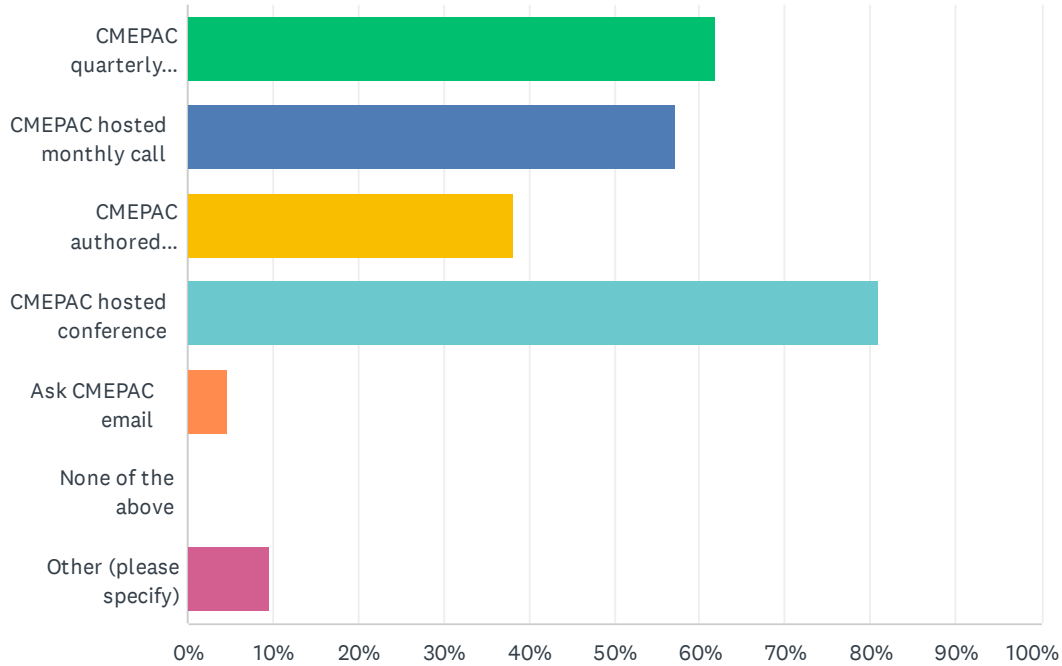
ANSWER CHOICES	RESPONSES	
CMEPAC quarterly meeting discussions	61.90%	13
CMEPAC hosted monthly call	57.14%	12
CMEPAC authored newsletter articles	38.10%	8
CMEPAC hosted conference	80.95%	17
Ask CMEPAC email	4.76%	1
None of the above	0.00%	0
Other (please specify)	9.52%	2
Total Respondents: 21		

Q13 For CMEPAC outreach, please provide feedback on CMEPAC's strengths

Answered: 5   Skipped: 16

- It's a stakeholder group that takes input from a diverse group of MRO members.

- The outreach covers a large area of topical information, which is helpful for such a varied audience of potential "customers." Also, it's beneficial to have the experience of qualified, experienced professionals in the NERC compliance space sharing their perspectives.

- High level of expertise and is a trusted source.

- Experienced, knowledgeable industry members sharing information; the conference, risk discussions

- Frequent meetings to discuss compliance issues

Q14 For CMEPAC outreach, please provide feedback on areas that could be improved

Answered: 8   Skipped: 13

- How does the Ask CMEPAC email differ materially than sending a question straight to RAM?
- It would be great to have a web space dedicated to CMEPAC. It can be access controlled, but the availability of information and where it is stored seems to vary. One library would be beneficial.
-
- More opportunities for the regional stakeholders to gather in person.

- I think the work plan discussions should be handled in a special call and not be part of the quarterly meeting agenda. Perhaps once a year, but certainly not at all of them. Otherwise, I think the council does an admirable job of promoting and facilitating outreach in the MRO region.

- More engagement of broader group, soliciting feedback from more entities to ensure the CMEPAC delivers value for all entities.

- Engagement and participation from more participants; focus on initiatives that reduce compliance risk (and reliability risk); more coordination and cooperation with industry and MRO - we are better rowing the same direction

2023 Open Ended Questions/Comments

Question:
One of the CMEPAC's key objectives is to develop a Highly Effective Reliability Organization (HERO) outreach effort to help registered entities assess and improve their own compliance and reliability practices. To help determine where more outreach is most needed, please rate your perceived understanding of the following HEROs characteristics:

a) Reluctance to simplify (ex: solid root cause analysis)
b) Sensitivity to operations (ex: carefully designed change management practices)
c) Deference to expertise (ex: authorities follow expertise)
d) Commitment to resilience (ex: resources dedicated to corrective action plans and training)
e) Preoccupation with failure (ex: attention to "close calls" and "near misses")

Responses:
While I personally have a decent understanding of the HERO principles, I am not sure other parts of the organization do. Tools which I can use to assist in implementing HERO characteristics in other groups besides my own would be useful.

I rated Deference to expertise lower as this is an area where we have a difference of opinion with the MRO audit team.

Would like more information on change management and resiliency and examples from industry of how they are managing that

Question:
A commonly requested topic is learning more about Internal Controls. What level of detail would you like to see regarding information on Internal Controls?

Responses:
The gap between the layer of specific controls and an internal controls program (ICP). How can entities reassure auditors of compliance without the entity having a bespoke ICP? Or is that impossible? We need an alternative to a full on, hard to maintain ICP when many entities struggle with few compliance staff. It's also unrealistic to expect small companies to have an Enterprise-wide program, which seems to be what gets you "compliance" credit. What's another way forward?

Evaluations of effectiveness of internal controls

Detailed examples of specific controls deemed effective following controls testing with recognition from MRO.

Question:

The CMEPAC is finalizing its work plan for 2024. To help with work prioritization, which offerings would be of most value to your organization?

Responses:

Item 1: there should be a discussion on the value of these guides for fully risk-based Standards, like CIP-013, which are not prescriptive and seem to have more implied requirements than actual requirements. Guides can have the unintended consequence of setting auditing expectations where the Standard deliberately attempted to avoid prescriptive processes. What type of meaningful implementation guidance is best for non-prescriptive Standards/Requirements?   Item 3: There should be more advertising on the benefits of risk assessments. However, rather than focus on "quality", which is subjective, the focus should be on sufficiency to prove, 1) minimal risk, and 2) risk reducers (for possible processing as a CE). If we see how a solid risk assessment can benefit our submittals, entities might improve on this aspect.   Item 4: NERC needs to decide if using these codes are meaningful. How beneficial are tracking trends if few entities use these codes. And, like with identifying misoperations, there would need to be training on applying these codes as they are always a clear fit for industry situations. Does the cost/benefit ratio support using them in any meaningful way? If so, commit to requiring them and modify Align accordingly.   Item 7: While it's good to have a refresher, and much has changed in NERC/compliance/ICP/RMF, this topic might be best presented as a break-out session for interested parties at a larger conference or as a presentation available in a library.   Item 8: The Risk Management Framework is an interesting   topic but I'm concerned it will become the next ICP, where small entities that can't afford or manage an Enterprise-wide risk management process or program can't find a way to get meaningful credit (what ever that turns out to be). For small entities the cost/benefit ratio of starting up and maintaining an ICP or RMF isn't clear for those who successfully managed compliance programs since 2007.   Item 9: Frankly, I don't understand the use of COPs. We didn't get an updated one after our previous audit, which means we're working on +3-year old data. This cycle is too static to be a metric for risk assessments beyond a generic low/moderate/high, which doesn't impact monitoring in any way. Getting an updated COP just prior to an audit is probably more distraction than aid. What can you do with it? Unfortunately, the only way a COP would be helpful to entities would be if it really did materially identify/shape monitoring activities. But monitoring activities seem driven more by regional and ERO risks as well as by newly effective Standards. COPs don't bridge the gap between risk and compliance for entities. It's easier to identify what they don't do than what they do.

Approve standard application guideline for cloud security!

Approve standard application guideline for cloud security!

The COP is currently not offering much value as the data is stale, boiler plate without much detail, and not reflective of the Company's compliance program. i.e., how is inherent risk offset by the quality of the NERC compliance program?

Question:
For CMEPAC outreach, please provide feedback on CMEPAC's strengths

Responses:
It's a stakeholder group that takes input from a diverse group of MRO members.

The outreach covers a large area of topical information, which is helpful for such a varied audience of potential "customers." Also, it's beneficial to have the experience of qualified, experienced professionals in the NERC compliance space sharing their perspectives.

High level of expertise and is a trusted source.

Experienced, knowledgeable industry members sharing information; the conference, risk discussions

Frequent meetings to discuss compliance issues

Question:
For CMEPAC outreach, please provide feedback on areas that could be improved

Responses:
How does the Ask CMEPAC email differ materially than sending a question straight to RAM? Also, I don't see a question on the monthly vs every other month vs quarterly CMEPAC call. Although it's good to have monthly check-in calls, I support moving calls to every other month with emails for emerging news, events, etc.

It would be great to have a web space dedicated to CMEPAC. It can be access controlled, but the availability of information and where it is stored seems to vary. One library would be beneficial.

More opportunities for the regional stakeholders to gather in person.

I think the work plan discussions should be handled in a special call and not be part of the quarterly meeting agenda. Perhaps once a year, but certainly not at all of them. Otherwise, I think the council does an admirable job of promoting and facilitating outreach in the MRO region.

More engagement of broader group, soliciting feedback from more entities to ensure the CMEPAC delivers value for all entities.

Would like to see more collaboration with MCCF. Consider use of MRO offices for the MCCF in person workshop. Other Regional Entities have similar arrangements.

Engagement and participation from more participants; focus on initiatives that reduce compliance risk (and reliability risk); more coordination and cooperation with industry and MRO - we are better rowing the same direction

Bi-annual Standards & Compliance Workshops (in-person)

Considerations and Next Steps

- **Considerations**

  - How to get higher response rate from annual stakeholder survey?

- **Next Steps**

  - Identify CMEP AC volunteers for the 2024 Annual Stakeholder Survey
  - Plan to launch in time for the responses to be inputs to the 2025 Work Plan; i.e., must be completed prior to Q4 meeting (October 9)

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MRO CMEP Conference Topics Discussion
Terri Pyle, CMEPAC Chair

Action
Discussion

Report
Terri Pyle will lead this discussion during the meeting.

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2023 CMEP Hybrid Conference Survey Results 39 responses as of 8/15/23

Attendance: 368 Total

117 In-person & **251** Virtual

Average Score for Event **4.35**

Questions   Average score per Question

1. Overall, how would you rate this event?   4.10

2. How relevant was the material provided to the work you do?   4.36

3. How likely are you to attend this or other MRO outreach events again?   4.46

4. For virtual attendees, how would you rate your experience with attending this event virtually?   4.46

5. If there is one thing you would have changed about this event, what would it be?

While it might sound insignificant, changing the orientation of the room so that the speaker is on the short wall and speaking to the entire audience without significant head movement would likely be appreciated by not only the attendees sitting at the far ends of the room but the speaker as well.

Really great day other than that. Matt did a fabulous job as MC. The morning presentations were especially stellar!

I attended in-person, so I left Question 4 blank. The conference was really good and I feel I got a lot out of it. This is my first in-person event since 2019 and it did not disappoint. I could have done without one particular participant's comments to Amy's presentation; however, that has nothing to do with the CMEPAC. I don't get much out of the SDT project update presentations, but that is because I follow SDT updates pretty regularly. However, those presentations are perfect and should not be changed. Today's presenters were really good. Thank you all for your hard work!

More time for Q&A.

I can't think of anything at this time.

Allow questions to continue rather than cut off per schedule and end up with unused time at the end. Although I appreciate sticking to the schedule if I have to attend other meetings and jump in and out of the event. I appreciate it is a difficult balance to achieve.

I attended virtually - I think it would be useful for each of the presenters to cover right at the beginning who their presentation is relevant to (ie GO GOP only, CIP Med and High only, TO BA RC only). For the most part attendees can figure it out and already know before attending the meeting which projects/standards are applicable to them. A simple up front statment made by the presenter would save alot of people alot of time.

Provided the slides prior to the event, say like a day before. The conference was really good, learned new things.

I really appreciated having speakers from NERC and FERC to help understand their perspective. Great job.

Q&A Session - perhaps have attendees post questions with registration or through an app during the

meeting The food was better in the past

Good job

Maybe include a break out session/roundtable of some kind over a hot topic

Discourage questions that turn into long stories or rude questions.

During the first break there was a suggestion to meet someone we didn't know. It was acknowledged that this would be challenging for remote participants. For other events (non-MRO) I've experienced using Slack or Discord to create rooms or other spaces aside from the main space where people could meet virtually and chat, as opposed to the single threaded main chat in WebEx (Everyone - would be very noisy) or one-on-one only WebEx chat with only the presenter or panelists. Please consider other ways to enable participants to interact more dynamically, while still allowing the organizers and presenters the ability to control the primary space (WebEx Everyone chat).

It would be nice if the recordings available after the fact would include all of the Q&A sessions. Many times, the Q&A sessions are equally as insightful as the presentation itself. If it is the MRO intention to censor the Q&A sessions a disclaimer should be provided. I think it is important to have the tough conversations, but in a respectful manner. I would have liked to have seen the tough Q&A included in the recordings. Especially for those who were unable to participate the day of the live event.

I like the meet and greet to simply hang out with old acquaintances and meet new folks - the hotel is good and close - easy walk to the MRO offices. All MRO staff was pleasant and the meetings went as scheduled with some good content! Thanks!

ERC's presentation, while excellent, did not have any relation to compliance, I think that was a missed opportunity. Lastly, but possibly more importantly, I found it very unfortunate how many errors were contained in the short agenda and the agenda packet. That is not what I have come to expect from MRO and it was a bit of a distraction. Tasha Ward's title was incorrect as she is not the Director of Compliance Monitoring and External Affairs Enforcement. Jess Syring is not a "Manger", but a manager. In the slides, Jim Kubrak of RF was referenced as "Kim Kubrak", slide numbers were not on all slides, I noticed this as I wanted to reference a slide number to follow-up on later, but I was unable to do that. There were things, but these are the issues that stood out the most.

While the MRO presentation on CIP-014 was not well received by all attendees, I for one want to keep hearing from MRO on their expectations and on areas where organizations are coming up short so I can course correct when needed.

Other Outreach Topic Ideas
Terri Pyle, CMEPAC Chair

Action
Discussion

Report
Terri Pyle will lead this discussion during the meeting.

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2024 Team Assignments Review
Terri Pyle, CMEPAC Chair

Action
Discussion

Report
Terri Pyle will lead this discussion during the meeting. Assignments and statistics will begin on the next page.

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MRO CMEP Advisory Council

2024 Teams

2024 CMEPAC Roster			Team Assignments
Name	**Company**	**Term End**	**Team**
Terri Pyle	Oklahoma Gas and Electric	12/31/2026	Conference (Lead)
Tiffany Lake	Evergy, Inc.	12/31/2026	Conference
Alison Archer	MISO	12/31/2025	Conference
Ashley Stringer	Oklahoma Gas and Electric	12/31/2026	Monthly Calls
Bryan Dixon	Xcel Energy	12/31/2024	Webinars (Lead)
Carl Stelly	Southwest Power Pool, Inc.	12/31/2024	Webinars
Ellen Watkins	Sunflower Electric	12/31/2025	Webinars
Eric Ruskamp	Lincoln Electric System	12/31/2026	Monthly Calls (Lead)
Kevin Lyons	Central Iowa Power Cooperative	12/31/2024	Newsletters
Larry Heckert	Alliant Energy	12/31/2024	Monthly Calls
Mark Buchholz	Western Area Power Administration	12/31/2025	Newsletters
Matt Caves	Western Farmers Electric Cooperative	12/31/2025	Webinars
Nazra Gladu	Manitoba Hydro	12/31/2024	Newsletters
Theresa Allard	Minnkota Power Cooperative	12/31/2026	Newsletters (Lead)
Troy Brumfield	American Transmission Company	12/31/2025	Monthly Calls

2024 Q1 Team UPDATES

Conference (July 24, Kansas City) – Terri Pyle
- Met with Outreach to discuss milestones and timelines
  - Save the Date communication will go out week of March 25th
  - Conference Announcement with Agenda and Speakers will go out week of May 13th
    - We can finalize the agenda in our Q2 meeting scheduled for May 7
  - Slides available 15-30 days prior to Conference

Webinars – Bryan Dixon
- Q1 Webinar scheduled for February 28th – Compliance Management Tools

Monthly Calls – Eric Ruskamp
- Need facilitators for September and December
- Discuss topic ideas for March (Ellen Watkins – Facilitator)
- Ideas: Using Align for audits – would this be a better webinar topic?

Newsletter Articles – Theresa Allard
- Q1 Article in process (Mark) – FERC Order 902
- Q2 Article planned (Nazra) – General Topic: Periodic Data Requests, Information, and Links
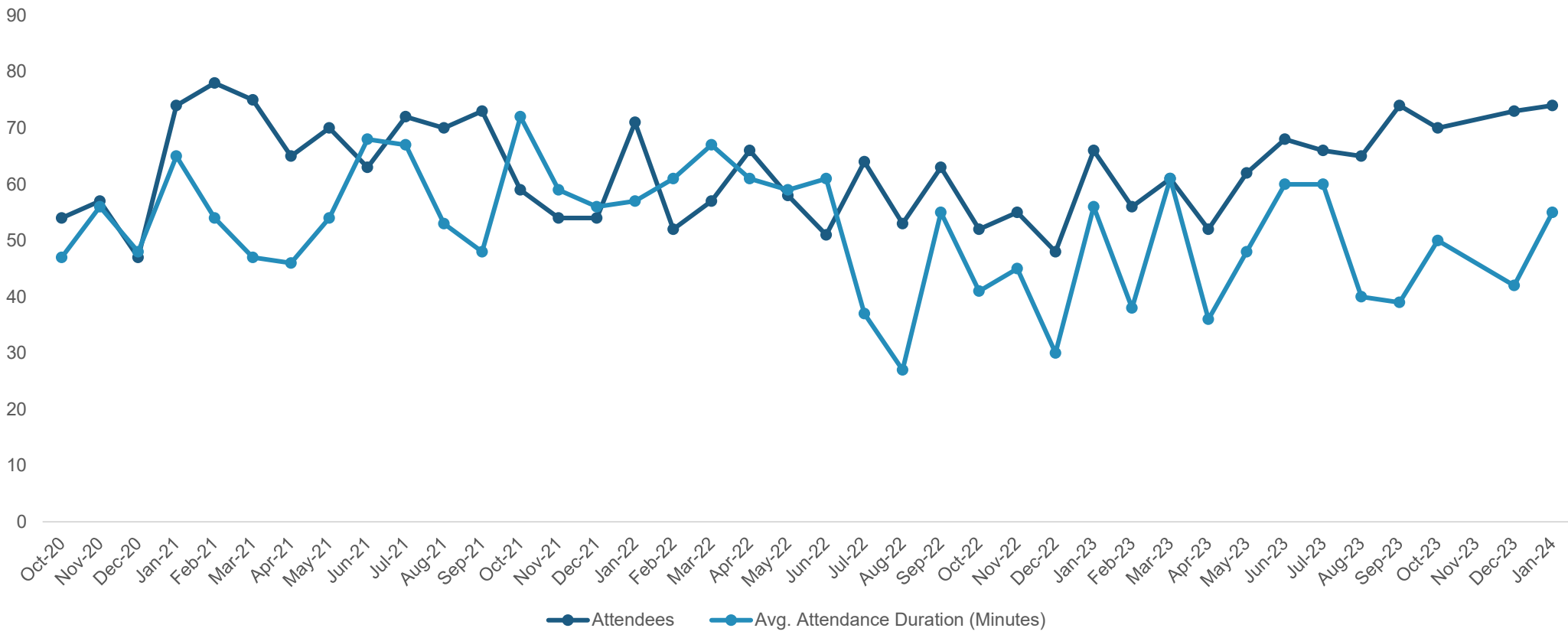
CMEPAC Call Metrics

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
March 2022	57	67 Minutes
April 2022	66	61 Minutes
May 2022	58	59 Minutes
June 2022	51	61 Minutes
July 2022	64	37 Minutes
August 2022	53	27 Minutes

September 2022	63	55 Minutes
October 2022	52	41 Minutes
November 2022	55	45 minutes
December 2022	48	30 Minutes
January 2023	66	56 Minutes
February 2023	56	38 Minutes
March 2023	61	61 Minutes
April 2023	52	36 Minutes
May 2023	62	48 Minutes
June 2023	68	60 Minutes
July 2023	66	60 Minutes
August 2023	65	40 Minutes
September 2023	74	39 Minutes
October 2023	70	50 Minutes
December 2023	73	42 Minutes
January 2024	74	55 Minutes

Currently there are 198 registered for the monthly calls.

CMEP Call Statistics

Legend: Attendees, Avg. Attendance Duration (Minutes)

X-axis: Oct-20, Nov-20, Dec-20, Jan-21, Feb-21, Mar-21, Apr-21, May-21, Jun-21, Jul-21, Aug-21, Sep-21, Oct-21, Nov-21, Dec-21, Jan-22, Feb-22, Mar-22, Apr-22, May-22, Jun-22, Jul-22, Aug-22, Sep-22, Oct-22, Nov-22, Dec-22, Jan-23, Feb-23, Mar-23, Apr-23, May-23, Jun-23, Jul-23, Aug-23, Sep-23, Oct-23, Nov-23, Dec-23, Jan-24

2024 Work Plan Project Volunteers
Terri Pyle, CMEPAC Chair

Action
Discussion

Report
Terri Pyle will lead this discussion during the meeting.

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2024 CMEPAC Work Plan Activity Volunteers

#	Activity	Volunteers
3	MRO Collaboration Site Enhancements	
4	CMEPAC webinar/material library	
11	Stakeholder Survey	
12	RRA Participation	
13	RRA/Standards Coverage Initiative	
14	Requirement Specific RFI templates	

2024 Meeting Dates and Other Scheduled Outreach
Terri Pyle, CMEPAC Chair

Action
Information

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	Q1 2024	Q2 2024	Q3 2024	Q4 2024
RAC	2/22	5/16	8/8	10/3
SAC	2/21	5/14	8/6	10/3
CMEPAC	2/20 Virtual	5/7	7/23	10/3
PRS	3/12	6/11	9/10	12/10
OGOC	3/6 Virtual	5/22	8/20	11/6
BOD	2/8 Virtual	5/23	8/22	11/7

*Joint council meeting 10/2/24 PM

MRO CONFERENCE DATES 2024	
Q1	**RAM Conference: March 20, 2024, Virtual conference**
Q2	**Reliability Conference: May 14-15, 2024, Social networking event and conference (hybrid)**
Q3	**CMEP Conference: July 23-24, 2024, Social networking event and conference (hybrid); Kansas City, MO**
Q4	**Security Conference: October 1-2, 2024, Social networking event, training, and conference (hybrid)**

OTHER OUTREACH
MRO Regional Risk Assessment Overview Webinar: February 28, 2024, 9:00 a.m. – 10:00 a.m. Central
MRO Compliance Management Tools Webinar: February 28, 2024, 1:00 p.m. – 2:00 p.m. Central
MCCF Summer Forum: July 25, 2024, Kansas City, MO

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Action Item Review
Anna Martinson, RAM and Enforcement/External Affairs Administrator

Action
Discussion

Report
Anna Martinson 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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