

# NERC and Regional Coordination Compliance Update

October, 2010

Standards	Project	Activity	Due Date
<b>NERC – CIP-002-1</b>	<b>Interpretation 2010-INT-05 - CIP-002-1 Requirement R3 for Duke Energy – Duke</b> has requested interpretation of several items included in Requirement 3, including; What does the phrase, "essential to the operation of the Critical Asset" mean?	<b>Comment</b>	<b>10/08/2010</b>
<b>NERC TPL-001, 002, 003, 004</b>	<b>Project 2010-11 - TPL Table 1 Order - The</b> standard drafting team made conforming changes to footnote 'b' based on industry feedback. The footnote was intended to provide clarity to the industry with regard to the planned or controlled interruption of electric supply where a single contingency occurs on a transmission system. After the August, 2010 technical conference,	<b>Comment</b>	<b>10/08/2010</b>

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<b>NERC Cont. - TPL-001, 002, 003, 004</b>	a revised footnote was written which includes the following points: 1) An objective of the planning process is to avoid interruption of Demand. 2) - Demand may need to be interrupted in limited circumstances to address BES performance requirements. There are limitations for Demand which include: 1) Demand that is directly served by the elements that are removed. 2) Interruptible Demand or Demand-Side Management. 3) Demand that does not adversely impact overall BES reliability	<b>Comment</b>	<b>10/08/2010</b>
<b>NERC PRC-005</b>	<b>Project 2007-17 - Protection System Maintenance and Testing</b> – Proposed revision to definition of Protection System	<b>Comment</b>	<b>10/12/2010</b>

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<p><b>NERC – PRC-023</b></p>	<p><b>Project 2010-13: Relay Loadability Order -</b>            A draft PRC-023 Attachment B has been posted for a 20-day informal comment period. Attachment B provides a set of criteria for the Planning Coordinator to use in determining which of the facilities (transmission lines operated below 200 kV and transformers with low voltage terminals connected below 200 kV) in its Planning Coordinator Area are critical to the reliability of the bulk electric system to identify the facilities below 200 kV that must meet specific relay loadability criteria. The criteria proposed in Attachment B were under field test and not available to the drafting team when the team prepared the other modifications to PRC-023-1 that were posted through September 19, 2010.</p>	<p><b>Informal Comment</b></p>	<p><b>10/12/2010</b></p>

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<b>NERC CIP-001-1 EOP-004-1</b>	<b>Project 2009-01 - Disturbance and Sabotage Reporting</b> - Stakeholders have indicated that identifying potential acts of “sabotage” is difficult to do in real time, and additional clarity is needed to identify thresholds for reporting potential acts of sabotage in CIP-001-1.	<b>Comment</b>	<b>10/15/2010</b>
<b>NERC FAC-012 FAC-013</b>	<b>Project 2010-10 - FAC Order 729</b> - In Order 729, FERC ruled that the ATC standards developed in Project 2006-07 did not completely address the topics covered in FAC-012 and -013. Accordingly, the FERC denied the portions of the implementation plan that would have retied these standards, and instead directed changes to the FAC	<b>Ballot Comment</b>	<b>10/20/2010 11/03/2010</b>

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<b>NERC Cont. - FAC-012 FAC-013</b>	standards to be made and submitted back to the FERC no later than 60 days prior to the effective date of the standards. This SAR is being created in response to the FERC Order.	<b>Ballot Comment</b>	<b>10/20/2010 11/03/2010</b>
<b>NERC CIP-002 through CIP-009</b>	<b>Project 2008-06 - Cyber Security Order 706</b> – Scope includes modification of the standards so they conform to the latest approved versions of the ERO Rules of Procedure as outlined in the Standard Review Guidelines identified in Attachment 1, and addressing the directives issued by FERC, in Order 706 relative to the approved Cyber Security Standards CIP-002-1 through CIP-009-1. Also, includes incorporation of clarifications from the Interpretation of CIP-006-1 Requirement 1.1.	<b>Ballot Comment</b>	<b>10/20/2010 11/03/2010</b>

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<b>NERC FAC-013-2</b>	<b>Project 2010-10 - FAC Order 729</b> - The drafting team posted its responses to the comments it received with the initial posting of the proposed SAR, FAC-013-2 Standard, and associated Implementation Plan. The team made some clarifying changes to the Standard and its Implementation Plan and has posted these for a 45-day formal comment period.	<b>Comment</b>	<b>11/03/2010</b>

- CVIs, CIP Spot Check, Audit Results
  - PJM will file position paper and mitigation overview by October 15<sup>th</sup>

- In Development
  - TO/GO Process
  - TOP-006
    - PJM operator relay information
  - BES Definition
    - Will be included in Manual 3a rather than separate compliance bulletin
  - MOD-004 implementation
  - Definition of ‘access’, as used in CIP

- RFC TO Matrix Review of PJM TOs
  - RFC to review two PJM TOs compliance with TO Matrix
    - One in October 2010, the other in December 2010
    - Purpose is to gather information to develop formal TO Matrix Audit Program
      - Treating Matrix as de facto JRO agreement?
      - ALL PJM TOs to be audited on the Matrix beginning in 2011
  - Rescheduled from a half day review to two full days

- Next Monthly WebEx
  - October 21, 2010
  
- Quarterly Meeting
  - November 18, 2010
  - February 17, 2011