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Dates & Events

February 2015

- 4 NERC <u>State of</u> <u>Standards</u> Webinar
- 11 NERC Board of Trustees Meeting, San Diego, CA
- 13 White House <u>Summit</u> on <u>Cybersecurity and</u> <u>Consumer Protection</u>, Stanford University
- 17-18 NERC <u>Technical</u>
 <u>Conference</u> for Review
 of EOP and FAC
 Standards, Salt Lake
 City, UT
- 19 FERC <u>Technical</u>
 <u>Conference on</u>
 <u>Reliability</u>
 Considerations of EPA
 CO₂ Regulations,
 Washington, DC
- 25 FERC Western Regional
 Technical Conference
 on Reliability
 Considerations of EPA
 CO₂ Regulations,
 Denver, CO

Electric Reliability Update

JANUARY 29, 2015

FERC

FERC Issues Supplemental Notice on Regional Technical Conference – January 26 – In an update to its January 6 Supplemental Notice, FERC <u>announced</u> the date, location, and agenda for its Western Region technical conference on the implications of compliance approaches to EPA's Clean Power Plan proposed rule. The Western Region conference will take place on February 25 in Denver and will cover electric reliability considerations, infrastructure needs, and potential implications for wholesale markets and bilateral trading. FERC will also hold separate hearings on the Clean Power Plan in Washington, D.C., and St. Louis.

FERC Approves PRC-005-3 Reliability Standard - January 20 - FERC <u>approved the revised PRC-005-3 reliability standard</u> submitted by NERC. This revised reliability standard requires applicable entities to test and maintain certain auto-reclosing relays as part of a protection system maintenance program. FERC's approval directs NERC to develop a modification to this reliability standard to ensure that proper maintenance and testing is done for all parts of a reclosing relay scheme that could potentially impact the Bulk-Power System. <u>FERC published notice of its final rule in the Federal Register on January 27th</u> and the rule will become effective on March 30, 2015.

Extension of Time for CIP Standard Revisions - January 13 - NERC filed a motion with FERC requesting a ten-day extension of time to file revisions to the fifth version of the Critical Infrastructure Protection (CIPv5) standards, and indicated that the delay would allow completion of a balloting process. The standards will revise "identify, assess, correct" language, modify standards for "low impact" violations, create standards for certain portable electronic devices, and define and create standards for communication networks. FERC granted the extension on the same date as NERC's request, and the revised standards are now due February 13, 2015.

FERC Accepts NERC Filing on FRCC Bylaws – January 13 – FERC <u>accepted NERC's uncontested filing</u> relating to its November 19, 2014 submission of amendments to its Delegation Agreement with Florida Reliability Coordinating Council, Inc. (FRCC).

NERC

SPP Delegation Agreement Revisions Filed - January 23 - NERC filed with FERC proposed revisions to NERC's delegation agreement with SPP. The revisions reflect amendments to SPP's bylaws clarifying obligations of any SPP members who exit SPP, and facilitating the entry into SPP of the Integrated System (consisting of transmission assets operated by the Western Area Power Administration - Upper Great Plains region, Heartland Consumers Power District, and Basin Electric Power Cooperative).

NERC Requests FERC Approval of Proposed Geomagnetic Disturbance Standard - January 21 - NERC submitted a <u>petition for approval of proposed Reliability Standard TPL-007-1</u> (Transmission System Planned Performance for Geomagnetic Disturbance Events) to FERC. The proposed standard would require Bulk-Power System owners and operators to conduct periodic geomagnetic vulnerability assessments and to develop a corrective action plan to address any deficiencies identified in the assessments.

NERC Submits Errata to Informational Filing of Reliability Standards Development Plan for 2015-2017 - January 21 - NERC <u>submitted an errata to correct certain minor errors in its Information Filing of Reliability Standards Development Plan for 2015-2017</u>. The redline of the proposed changes included with the errata filing shows that NERC corrected a number of factual errors and incorrect numbers submitted in its original filing.



NERC Balloting & Comment Deadlines

February 2015

2 <u>Final Ballot Closes</u>: Project 2014-02 – Critical Infrastructure Protection Standards Version 5 Revisions – CIP-003-7, CIP-004-7, CIP-007-7, CIP-010-3, and CIP-011-3

Selected Regional Compliance / Training Events

February 2015

11-12 MRO CIP Version 5 Workshop

25-25 <u>SERC Spring Compliance</u> <u>Seminar</u>

<u> March 2015</u>

10-11 <u>SPP Spring Compliance</u> <u>Workshop</u> **NERC Releases New Version of 2016 Business Plan and Budget Schedule** - December 16 - NERC released version 5 of its <u>draft 2016 Business Plan and Budget Schedule</u>.

Cybersecurity and Grid Security

Research Reveals Range of Responses to Critical Infrastructure Protection Standards A doctoral thesis by Marlene Ladendorf, a researcher at Idaho National Laboratory, provides insight into utility responses to NERC's CIP standards. The thesis utilizes anonymized questions to registered entities, which reveal that some utilities are concerned about financial impacts, others believe that cyber threats are overblown, and in some instances equipment would be downgraded to reduce CIP compliance obligations.

Congress

Senate Committee on Homeland Security and Governmental Affairs Holds Cybersecurity Hearing - January 28 - The U.S. Senate Committee on Homeland Security and Governmental Affairs held a meeting entitled "Protecting America from Cyber Attacks: The Importance of Information Sharing." Committee Chairman Ron Johnson indicated that the purpose of the hearing was to take the first step in better understanding cybersecurity threats in hopes of passing legislation during this congressional session. Business representatives from American Express, Microsoft Corporation, and Marsh & McLennan Companies testified regarding the evolving nature of security threats and sheer increase in numbers of threats in recent years. Additionally, individuals from cybersecurity software provider FireEye and the policy organization Center for Democracy & Technology also testified at the hearing.

House Science and Technology Committee Hears Cybersecurity Testimony - January 27 - The Research and Technology Subcommittee of the House Science and Technology Comittee held a hearing on "The Expanding Cyber Threat." Witnesses included members of the information technology industry, as well as representatives of the National Science foundation, the National Institute of Standards and Technology, and the Congressional Research Service. Testimony is available on the hearing on the committee website.

Regional Developments

ReliabilityFirst Issues CIP Compliance Report – January 22 – ReliabilityFirst released a report identifying common themes among the approximately 400 compliance violations between 2010 and 2014, and offering potential solutions to those issues. Each of the 400 reported or discovered compliance deficiencies were rooted in at least one of five themes identified in the report, with most of the violations caused by a lack of internal coordination or from "view[ing] compliance as merely a 'paper compliance' exercise rather than viewing it as a baseline level of what an entity needs to do to maintain security." Other themes highlighted in the report include inadequate use of tools by entities, outsourcing core functions, and lack of awareness of how an entity's systems work.

About Us

The Van Ness Feldman Electric Reliability Update is published by <u>Andrew Art, Malcolm McLellan</u> and <u>Gabe Tabak</u>, with assistance from <u>Chris Zentz</u>, <u>Ilan Gutherz</u>, and <u>Van Smith</u>. <u>Van Ness Feldman</u> counsels, advises and trains a wide range of clients on reliability matters. Please <u>email us</u> or call us at 202.298.1817 or 206.829.1814 for additional information.

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