

vnf.com



Dates & Events

April 2015

- 24 Industry Webinar –
 Periodic Review of
 Emergency Operations
- 27 Industry Webinar <u>System Protection</u> <u>Coordination</u>
- 28 Industry Webinar <u>Uncoordinated</u> <u>Protection Systems</u>

May 2015

- 6-7 NERC <u>Board of Trustees</u> <u>Meeting</u>, Arlington, VA
- 21 Industry Webinar –

 <u>Monitoring and</u>

 <u>Situational Awareness</u>
- 21 Comments due to
 ROPcomments@NERC
 .net on Reliability
 Assurance Initiativebased changes to Rules
 of Procedure
- 28 Comments due to
 ROPComments@NERC
 .net on Risk-Based
 Registration changes to
 Rules of Procedure

Electric Reliability Update

APRIL 23, 2015

FERC

FERC Issues Final Rule Approving BAL-001-2 Standard - April 16 - FERC issued a final rule approving reliability standard BAL-001-2, which addresses Real Power Balancing Control Performance and four new definitions. The new standard is designed ensure that applicable entities maintain system frequency within narrow bounds around a scheduled value. The standard is intended to improve reliability by adding a frequency component to the measurement of a Balancing Authority's Area Control Error. The approved standard becomes effective July 1, 2016.

FERC Accepts Two COM Standards - April 16 - FERC issued Order No. 808, accepting two proposed NERC communications standards. Standard COM-001-2 establishes communications requirements which functional entities must have in place and maintain; FERC largely accepted this standard as proposed, but required an additional filing addressing internal communications. Standard COM-002-4 requires applicable entities to develop communications protocols meeting certain requirements (including three-part communication when issuing operating instructions), sets out communications training requirements, and establishes a flexible enforcement approach for non-emergency violations and a mandatory enforcement system for violations of the standard during emergency conditions. Standard COM-001-2 will be effective on October 1, 2015, and standard COM-002-4 will be effective on July 1, 2016.

FERC Proposes to Approve Reliability Standard PRC-002-2 - April 16 - FERC issued a Notice of Proposed Rulemaking (NOPR) proposing to approve Reliability Standard PRC-002-2 (Disturbance Monitoring and Reporting Requirements). The proposed standard, which consolidates the requirements of unapproved Reliability Standard PRC-002-1 and currently-effective Reliability Standard PRC-018-1, would require the availability of adequate time-synchronized data for post-disturbance analysis. Comments on the NOPR are due June 22.

FERC Issues NOPR on PRC-005-4 Standard - April 16 - FERC proposed to approve Reliability Standard PRC-005-4 (Protection System, Automatic Reclosing and Sudden Pressure Relaying Maintenance), which would expand the applicability of Reliability Standard PRC-005-3 to include "those sudden pressure relays that NERC has identified as having a potential effect on the reliable operation of the Bulk-Power system." Comments on the proposed rule are due by June 22.

FERC Announces Bulk Power System Technical Conference - April 9 - <u>FERC announced</u> that it will hold a technical conference on the reliability of the bulk power system in Washington, DC on June 4, 2015. The agenda will be announced closer to the conference date, but <u>registration is now open</u> for inperson and web attendees.

NERC

NERC Releases Report Identifying Reliability Impacts of Clean Power Plan - April 21 - NERC released its Phase 1 report assessing potential reliability impacts of EPA's proposed Clean Power Plan, which would regulate carbon dioxide emissions from existing fossil-fuel generators. The report includes a sensitivity analysis to evaluate resource adequacy and compliance timelines in light of a range of gas prices and potential single- or multi-state compliance plans, as well as an analysis of transmission and gas pipeline adequacy and a review of existing studies. The report indicates that the infrastructure improvements necessary to support the Clean Power Plan will require longer compliance and implementation plans, and recommends that EPA include a reliability assurance mechanism in the final rule (anticipated in summer 2015). Once the rule is finalized, NERC will conduct Phase II analysis, and anticipates a report in 2016.



NERC Balloting & Comment Deadlines

April 2015

- 27 <u>Final Ballot Closes</u>: Project 2008-02.2 – Phase 2 of Undervoltage Load Shedding (UVLS): Misoperations – PRC-004, PRC-010
- 29 <u>Final Ballot Closes</u>: Project 2014-04 – Physical Security – CIP-014-2
- 30 <u>Joint Ballot Pool Closes:</u> Project 2007-06 – System Protection Coordination – PRC-027-1

<u>May 2015</u>

- 11 <u>Comments Due</u>: Project 2015-02 – Periodic Review of Emergency Operations – EOP-004, EOP-005, EOP-006, and EOP-008
- 15 Additional Ballot and Non-Binding Poll Closes and Comments Due: Project 2007-06 – System Protection Coordination – PRC-027-1
- 19 <u>Comments Due</u>: Project 2010-04.1 – MOD-031 – FERC Order No. 804 Directives – SAR

Selected Regional Compliance / Training Events

May 2015

- 11-13 FRCC CIP Spring Compliance Workshop
- 13 TRE Spring Standards and Compliance Workshop
- 19-21 NPCC Spring Compliance and Standards Workshop

June 2015

2-3 SPP CIP 2015 Workshop

NERC Issues Statement in Response to FERC Orders Approving Reliability Standards and Issuing NOPRs - April 16 - NERC posted on its website a statement of approval of FERC's orders adopting three reliability standards and issuing two Notices of Proposed Rulemaking (NOPR). In its statement, NERC indicates that it supports FERC's decisions and emphasized the need for the Communications and Resource and Demand Balancing standards approved by FERC.

NERC Submits Motion for 6o-Day Extension on ROP Revisions - April 13 - NERC requested a 6o-day extension from FERC to comply with the Commission's request for revisions to the NERC Rules of Procedure (ROP). The revisions are intended to implement NERC's Risk-Based Registration (RBR) initiative. If the motion is granted, NERC would submit its compliance filing on or before July 17.

NERC Proposes Revisions to Rules of Procedure To Implement Risk-Based Registration and Reliability Assurance Initiatives - In response to FERC orders approving NERC's Risk-Based Registration (RBR) Initiative and Reliability Assurance Initiative (RAI), NERC has posted proposed revisions to its Rules of Procedure. Comments on the proposed RBR changes are due May 28 and comments on the proposed RAI changes are due May 21.

Cybersecurity and Grid Security

ICS-CERT Releases 2014 Annual Report - The Department of Homeland Security's Industrial Control Systems Cyber Emergency Response Team (ICS-CERT) released its <u>2014 Year in Review report</u>. The report states that incidents reported at energy facilities were a higher proportion of overall incidents than any other critical infrastructure sector, totaling 32% of all identified cyber incidents. The report also discusses on-site inspection programs and ongoing DHS efforts to improve cyber security at critical infrastructure facilities.

Congress

Cybersecurity Legislation Committee Report Filed - A report from the Senate Committee on Intelligence was filed for the Cybersecurity Information Sharing Act of 2015. The legislation would create additional incentives to increase sharing of cybersecurity threat information and facilitate voluntary cooperation between private companies and the government in sharing cyber threat indicators.

Cybersecurity Protection Advancement Act Advances Through Committee - April 21 - The National Cybersecurity Protection Advancement Act of 2015 (H.R. 1731), introduced by Rep. Michael McCaul (R-TX), will be considered by the House Rules Committee. The bill would amend the Homeland Security Act of 2002 to increase cooperative information sharing regarding cybersecurity risks while also attempting to address privacy concerns.

Regional Developments

ReliabilityFirst Posts Annual Report - ReliabilityFirst posted its <u>Annual Report for Fiscal Year 2014</u>. The report describes RFC's implementation of the Reliability Assurance Initiative, implementation of an RFC Entity Risk Management Program; RFC's corporate reorganization, including the creation of three new departments – Entity Development, Risk Analysis & Mitigation, and Standards and Services; the activities of each of the three new departments; and compliance and enforcement activities.

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. Click <u>here</u> to sign up for the Reliability Update.

Follow us on Twitter @VNFELECTRIC.

© 2015 Van Ness Feldman, LLP. All Rights Reserved. This document has been prepared by Van Ness Feldman for informational purposes only and is not a legal opinion, does not provide legal advice for any purpose, and neither creates nor constitutes evidence of an attorney-client relationship.