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Attachment A *Reliability Standards Development Plan: 2019-2021*

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**North American Electric Reliability
Corporation**

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**Docket Nos. RM05-17-000
RM05-25-000
RM06-16-000**

**NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
INFORMATIONAL FILING OF RELIABILITY STANDARDS DEVELOPMENT PLAN
2019-2021**

The North American Electric Reliability Corporation (“NERC”) hereby submits its 2019-2021 Reliability Standards Development Plan (“2019 Development Plan”) in accordance with Section 310 of the NERC Rules of Procedure.¹ The 2019 Development Plan, included herein as **Attachment A**, provides a status update on active development projects, a forecast of future work to be undertaken by industry participants and NERC throughout the upcoming year, and an analysis comparing completed projects and development accomplishments with the prior year’s Reliability Standards Development Plan. The NERC Board of Trustees (“NERC Board”) approved the 2019 Development Plan on November 7, 2018. NERC submits this filing and attached 2019 Development Plan for informational purposes only.

¹ Section 310 of NERC’s Rules of Procedure requires NERC to develop and provide an annual Reliability Standards Development Plan for development of Reliability Standards to the applicable governmental authorities. Under that Section, NERC is also required to consider comments and priorities of the applicable governmental authorities in any updates made to the plan, and the plan should compare current accomplishments with the prior plan. *See* NERC’s Rules of Procedure, accessible online at: <http://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx>.

I. NOTICES AND COMMUNICATIONS

Notices and communications regarding this filing may be addressed to the following:

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II. BACKGROUND

Pursuant to Section 310 of the NERC Rules of Procedure, NERC submitted an initial version of a plan for Reliability Standards development, titled the *Reliability Standards Development Plan: 2007–2009*, to the Federal Energy Regulatory Commission (“FERC” or “Commission”) in 2006. NERC has since updated the plan annually, and the 2019-2021 version of the plan is presented in this filing. Consistent with previous versions, the 2019 Development Plan is filed for informational purposes and no specific Commission action is requested at this time.

The 2019 Development Plan is intended to:

1. Serve as a management tool to guide and coordinate the development of Reliability Standards and provide benchmarks for assessing progress;
2. Serve as a communications tool for coordinating standards development work with applicable governmental agencies in the United States and Canada and for engaging stakeholders in Reliability Standards development activities; and
3. Provide a basis for developing annual plans and budgets for the NERC Reliability Standards Program.

As with each prior year’s plan, NERC obtained stakeholder input on the 2019 Development Plan. As detailed in Section III, NERC submits this filing to summarize the 2019

Development Plan and inform the Commission and other interested parties of projects noted in the 2018 Development Plan that will continue into 2019.

III. 2019 DEVELOPMENT PLAN

A. Summary of the 2019 Development Plan

The 2019 Development Plan identifies the current plans and priorities for development and modification of NERC Reliability Standards in the immediate three-year time horizon. NERC anticipates that the Reliability Standards development work outlined in the 2019 Development Plan will be dynamic and will be updated periodically as projects are completed or as new needs are identified and projects are considered. NERC also recognizes Reliability Standards development in 2019 may require flexibility in planning to ensure that activities are given appropriate resources and priority.

The 2019 Development Plan builds upon the work of previous years in transforming the body of NERC Reliability Standards into a mature state. Most of the work in future years will focus on projects related to the Standards Efficiency Review, periodic reviews, and the standards grading initiative. Periodic Reviews and initiatives such as the Standards Efficiency Review project enable NERC to identify requirements that do little to promote reliability and should therefore be retired. As with the 2018 Development Plan, periodic reviews will occur at a measured pace compared to the level of activity and pace of standards development during recent years. Additionally, periodic reviews will be aligned with the strategic consideration of reviewing standard families that are interrelated. The final grades for standards graded in 2018 (listed in Attachment 1 to the 2019 Development Plan) also help to inform the Periodic Reviews as to the quality and content of the standards.

Projects to develop new or revised Reliability Standards may be initiated in response to Commission directives or to address new or emerging risks. To identify reliability risks, NERC will continue to seek input and recommendations from the Reliability Issues Steering Committee (“RISC”) and employ feedback from sources such as the Compliance Monitoring and Enforcement Program, RISC profiles, Events Analysis, Compliance violation statistics, published “Lessons Learned,” and any feedback from Regional Entities. NERC will use the information available to evaluate a reliability risk and determine whether a Reliability Standard project is the best tool to initially address that risk. Projects to develop new or revised Reliability Standards may also be initiated in response to standard authorization requests, such as those submitted in response to the work of the various NERC technical committees and working groups thereunder.

B. 2018 Progress Report

The 2018 Development Plan identified 11 standard development projects that would be initiated in 2018 or continue from 2017. The projects and their current status are noted below. Additional project information is available on the NERC website on the Standards web page.²

1. Projects Completed in 2018

Several projects identified in the 2018 Development Plan were completed in 2018. These projects, along with when the associated standard(s) were adopted by the NERC Board, are identified below:

- Project 2016-04 Modifications to PRC-025-1 (adopted February 2018)
- Project 2017-02 Modifications to Personnel Performance, Training, and Qualifications Standards – PER-003 and PER-004 (adopted May 2018)

² NERC Reliability Standards, <http://www.nerc.com/pa/Stand/Pages/default.aspx>.

- Project 2017-06 Modification to BAL-002-2 (adopted August 2018)
- Project 2016-02 Modifications to CIP Standards, CIP-012-1 only (adopted August 2018)
- Project 2015-10 Single Points of Failure TPL-001 (adopted November 2018)

In addition to the above-listed projects, NERC completed an initial assessment of the entire body of Reliability Standards in 2018 under its Standards Efficiency Review initiative.

2. Projects Continuing in 2019

The following standard development projects identified in the 2018 Development Plan will continue into 2019:

- Project 2015-09 Establish and Communicate System Operating Limits – FAC-010, FAC-011, FAC-014
- Project 2016-02 Modifications to CIP Standards
- Project 2017-01 Modifications to BAL-003-1.1

The following four projects identified in the 2018 Development Plan will also continue into 2019, with work to be coordinated with the Standards Efficiency Review:

- Project 2017-03 FAC-008 Periodic Review
- Project 2017-04 Periodic Review of Interchange Scheduling and Coordination Standards – INT-004, INT-006, INT-009, and INT-010
- Project 2017-05 Periodic Review of NUC-001-3
- Project 2017-07 Standards Alignment with Registration

Each of these projects are identified and prioritized in the 2019 Development Plan, as described in the following section.

C. Prioritization of 2019 Projects

For each new Reliability Standard Project identified in the 2019 Development Plan, the NERC Standards Committee has assigned a priority of either high, medium, or low. These rankings are in addition to priority assignments made in previous plans for ongoing projects, and the assignments are based on the following criteria: (i) outstanding regulatory directives with filing deadlines (high priority); (ii) RISC category rankings of high impact with consideration of probability of occurrence (high or medium priority); (iii) potential reliability risks identified through feedback mechanisms (high, medium, or low priority, based on the risk); (iv) outstanding regulatory directives without regulatory deadlines, or regulatory considerations (high or medium priority); (v) outstanding requirements that are known candidates for retirement (medium or low priority); and (vi) any known adverse content and quality assessment (likely low priority). The new and continuing projects identified in the 2019 Development Plan and their assigned priority category are provided below.

High Priority

- Project 2018-02 Modifications to CIP-008 Cyber Security Incident Reporting
- Project 2016-02 Modifications to CIP Standards
- Project 2015-09 Establish and Communicate System Operating Limits - FAC-010, FAC-011, FAC-014
- Project 2018-04 Modifications to PRC-024-2³

Medium Priority

- Project 2017-01 Modifications to the BAL-003-1.1

³ On December 12, 2018, the Standards Committee accepted a Standard Authorization Request submitted by the NERC Operating and Planning Committees to consider revisions to the PRC-024-2 standard to address inverter-based resource performance. Project 2018-04 Modifications to PRC-024-2 will be assigned a high priority in 2019. Due to timing, this project was not identified in the 2019 Development Plan.

- Project 2018-01 Canadian-specific Revisions to TPL-007-2

Low Priority

- Project 2017-07 Standards Alignment with Registration
- Project 2017-05 Periodic Review of NUC-001-3
- Project 2017-04 Periodic Review of Interchange Scheduling and Coordination Standards - INT-004-3.1, INT-006-4, INT-009-2.1 and INT-010-2.1
- Project 2017-03 Periodic Review of FAC-008-3

In 2018, NERC initiated Project 2018-03 Standards Efficiency Review Retirements to consider recommendations for retirements from the first phase of the Standards Efficiency Review. Work will continue on this project in 2019. Also in 2019, NERC will continue work on the second phase of the Standards Efficiency Review. The second phase of this project is expected to result in recommendations for standard modifications, among other things. Any standard modification recommendations would then be considered through the standard development process.

In addition to the projects listed above, at least two periodic review projects should commence in 2019 based on feedback from industry and results of the standards grading project, among other initiatives. The timing of the periodic reviews will be coordinated with the Standards Efficiency Review to ensure the projects work together to review standards that may need to be modified.

Other projects may be initiated in 2019 based on new standard authorization requests, emerging risks to the Bulk Power System, or new regulatory directives. Additionally, work will continue on efforts to implement the “Technical Rationale for Reliability Standards” policy endorsed by the Standards Committee in June 2018.

The industry-led Standards Committee has prioritized current and upcoming projects, as communicated through prioritization schedules and project plans, to ensure that development moves at a measurable and sustainable pace.

IV. CONCLUSION

As discussed above, the 2019 Development Plan was developed in accordance with Section 310 of the NERC Rules of Procedure and identifies the current plans and priorities for development and modification of NERC Reliability Standards in the immediate three-year time horizon. NERC submits this filing and the attached 2019 Development Plan for informational purposes only.

Respectfully submitted,

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Date: December 14, 2018

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding. Dated at Washington, D.C. this 14th day of December, 2018.

/s/ Lauren A. Perotti

Lauren A. Perotti
*Counsel for the North American Electric
Reliability Corporation*

ATTACHMENT A

RELIABILITY STANDARDS DEVELOPMENT PLAN

2019-2021

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Reliability Standards Development Plan

2019-2021

October 2, 2018

RELIABILITY | ACCOUNTABILITY



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Background

As described herein, the 2019-2021 Reliability Standards Develop Plan (RSDP) builds upon the goals of the previous RSDPs with an additional objective of implementing changes based on the Standards Efficiency Review (SER) efforts that began in 2018.

Pursuant to Section 310 of the NERC Rules of Procedure, NERC is required to develop and provide to applicable governmental authorities an annual RSDP for Reliability Standards development. Each annual RSDP must include a progress report comparing results achieved to the prior year's RSDP. NERC is required to consider the comments and priorities of the applicable governmental authorities in developing and updating the annual RSDP. NERC also provides the RSDP to the NERC Standards Committee (SC) for review and posts the RSDP for industry comment.

Executive Summary

This 2019-2021 RSDP provides insight into standards development activities anticipated at the time of publication, so that stakeholders may make available resources needed to accomplish the standards development objectives. Additional activities such as Requests for Interpretation and Regional Variance development may impact the plan, but are not included at this time. In order to help the industry understand resource requirements for each project, the RSDP now shows time frames and anticipated resources for each project under development.

The 2019–2021 RSDP recognizes the diligent work over the last few years in transforming the body of NERC Reliability Standards into a mature state while shifting the focus of the standards program to Periodic Reviews, Federal Energy Regulatory Commission (FERC) directives, emerging risks, Standard Authorization Requests (SARs), the SER, and the standards grading initiative. The 2019-2021 RSDP also contemplates that the work of the various NERC technical committees and working groups thereunder may result in one or more SARs and subsequent standards projects. The 2019-2021 RSDP also includes plans for completing the Periodic Reviews initiated in prior years and for commencing additional Periodic Reviews in 2018.

Periodic Reviews and initiatives such as the streamlining SER project also enable NERC to identify requirements that do little to promote reliability and should therefore be retired. As with the 2018-2020 RSDP, Periodic Reviews will occur at a measured pace compared to the level of activity and pace of standards development during recent years. Additionally, Periodic Reviews will be aligned with the strategic consideration of reviewing standard families that are interrelated. The Standards Grading and “Final Grades for Standards Graded in 2018” (Attachment 1) also help to inform the Periodic Reviews as to the quality and content of the standards.¹

While most of the work in the next three years will focus on Periodic Reviews, SER implementation, and Standards Grading, there may be new or emerging risks identified that could generate new standards development projects. NERC will continue to seek input and recommendations from the Reliability Issues Steering Committee (RISC) with regard to emerging or potential risks to Bulk Electric System (BES) reliability that may require revisions to existing standards or new standards development.

To help determine impact of potential risk to BES reliability, NERC will use a variety of feedback mechanisms, including but not limited to, the Compliance Monitoring and Enforcement Program, RISC profiles, Events Analysis, and Compliance violation statistics, as well as any published “Lessons Learned.” The Regional Entities also have feedback mechanisms in place to solicit comments from industry and to help identify approaches to meet concerns and provide input to the standards. Input into standards will also continue to be coordinated with the North American Energy Standards Board as appropriate. In assessing feedback to create new or revised standards, NERC will focus on risk, reliability or security data, and enforcement information to determine whether a standard revision is the best tool to initially address the reliability risk.

¹ The Periodic Review standing review team grades the standards prior to conducting Periodic Reviews. The team includes representatives from NERC, the Regional Entities, and NERC technical committees. If the standard is revised through the standard development process in response to a Periodic Review recommendation(s), the Periodic Review standing review team will re-grade the standard with the revised language.

2018 Progress Report

Pursuant to Section 310 of the NERC Rules of Procedure, NERC offers the following progress report on Reliability Standards development in 2018.

FERC Directives

As of August 31, 2018, there are 16 outstanding FERC directives, six of which are related to standards and being resolved through the standards development process. The status of the Standards directives are reported quarterly to the NERC Board of Trustees (Board).

Projects Completed in 2018

The 2018-2020 RSDP identified 11 projects initiated in 2018 or continued from 2017. All of the projects listed therein were either completed or are planned to be completed in 2018 except for (see detailed description of the specific activities in the next section titled 2019 Projects):

1. Project 2015-09 Establish and Communicate System Operating Limits,
2. Project 2016-02 Modifications to CIP Standards, and
3. Project 2017-01 Modifications to the BAL-003-1.1.

Additional project information is available on the NERC website on the Standards web page.² Also, the SER completed an initial assessment of the entire body of standards in 2018 prior to initiating the Standards development process to consider any changes to the body of Reliability Standards.

The following projects have been or are planned to be completed in 2018 (actual and anticipated Board adoption dates are noted):

1. Project 2016-04 Modifications to PRC-025-1 (adopted by the Board in February 2018)
2. Project 2017-02 Modifications to Personnel Performance, Training, and Qualifications Standards – PER-003-1, and PER-004-2 (adopted by the Board May 2018)
3. Project 2017-06 Modification to BAL-002-2 (adopted by the Board in August 2018)
4. Project 2016-02 Modifications to CIP Standards, CIP-012-1 only (adopted by the Board in August 2018)
5. Project 2015-10 Single Points of Failure TPL-001 (Board adoption anticipated November 2018)

² As of the date of publication, the subject web page resides at <http://www.nerc.com/pa/Stand/Pages/default.aspx>.

2019 Projects

Projects Continuing into 2019

In determining high, medium, or low priority designations for projects as listed in this RSDP, the following factors were taken into consideration:

1. Outstanding regulatory directives with filing deadlines (High Priority)
2. RISC category rankings of high impact with consideration of probability of occurrence (High or Medium Priority)
3. Potential reliability risks from stakeholders provided through feedback mechanisms (High, Medium, or Low Priority, based on the risk)
4. Outstanding regulatory directives without regulatory deadlines or “soft directives” such as considerations (High or Medium Priority)
5. Outstanding requirements that are known candidates for retirement (Medium or Low Priority)
6. Any known adverse content and quality assessments (likely Low Priority, as any reliability gaps identified have already been addressed)

High Priority

- Project 2018-02 Modifications to CIP-008 Cyber Security Incident Reporting (drafting estimated to be completed by February 2019 requiring approximately 10 industry subject matter experts for approximately 85 work hours each for the remaining part of this project)
- Project 2016-02 Modifications to CIP Standards (drafting estimated to be completed by November 2019 requiring approximately 13 industry subject matter experts for approximately 120 work hours each for the remaining part of this project)
- Project 2015-09 Establish and Communicate System Operating Limits - FAC-010, FAC-011, FAC-014 (drafting estimated to be completed by February 2019 requiring approximately 10 industry subject matter experts for approximately 50 work hours each for the remaining part of this project)

Medium Priority

- Project 2017-01 Modifications to the BAL-003-1.1 (drafting estimated to be completed by May 2019 requiring approximately eight subject matter experts for approximately 40 work hours each for this project)
- Project 2018-01 Canadian-specific Revisions to TPL-007-2 (drafting estimated to be completed by February 2019 requiring approximately eight subject matter experts for approximately 50 work hours each for this project)

Low Priority

- Project 2017-07 Standards Alignment with Registration (drafting estimated to be completed by May 2019, pending the SER project, requiring approximately eight subject matter experts for approximately 40 work hours each for this project)
- Project 2017-05 Periodic Review of NUC-001-3 (drafting estimated to be completed by May 2019, pending the SER project, requiring approximately eight subject matter experts for approximately 40 work hours each for this project)

- Project 2017-04 Periodic Review of Interchange Scheduling and Coordination Standards - INT-004-3.1, INT-006-4, INT-009-2.1 and INT-010-2.1 (drafting estimated to be completed by May 2019, pending the SER project, requiring approximately eight subject matter experts for approximately 40 work hours each for this project)
- Project 2017-03 Periodic Review of FAC-008-3 (drafting estimated to be completed by May 2019, pending the SER project, requiring approximately eight subject matter experts for approximately 40 work hours each for this project)

Projects Commencing in 2018 and Continuing into 2019

NERC Reliability Standards Efficiency Review

In 2018, NERC began using both internal ERO Enterprise resources and industry resources to evaluate candidates for potential retirements. NERC solicited industry participants to evaluate possible candidate requirements that may no longer be necessary to support reliability or address current risks to the Bulk Power System (BPS). Through open and transparent industry participation, the SER teams submitted a SAR to the SC in order to implement recommended changes to the body of Reliability Standards. The SAR was accepted at the August 2018 SC meeting, and the SER project will continue into 2019. The SER initiative may continue past 2019 pending additional industry input and SAR authorizations.

NERC will continue to coordinate with the industry team to ensure all of the information developed through the 2018 Standards Grading efforts, which includes consideration of content, quality, cost, and reliability impact analysis align with the SER projects. Thus, some projects such as the Standards Alignment with Registration and periodic reviews may have some natural synergies that allow for other projects to be combined with the SER initiative.

Other Projects Commencing

At least two Periodic Reviews should commence in 2019 based on feedback from industry and results of the Standards Grading project and other initiatives. However, the Periodic Reviews will coordinate timing with the SER project to ensure the initiatives work together to review the standards that may need to be modified. Additionally, SARs, emerging risks to the BPS, and FERC regulatory directives that may occur subsequent to publishing this RSDP may prompt additional projects through 2019.

Technical Rationale Transition Plan

The SC also charged the Technical Rationale Advisory Group (TRAG) with developing and overseeing an effective approach to implementing the “Technical Rationale for Reliability Standards” policy endorsed by the SC at its June 14, 2017 meeting. Consistent with the policy, the Reliability Standards template will no longer include a Guidelines and Technical Basis (GTB) section. Upon completion of this project, the GTB will be replaced by Technical Rationale documents and/or Implementation Guidance. That project will also require industry participation in order to review the existing GTB and determine: 1) if it is eligible to be transitioned directly to Technical Rationale; or 2) if the GTB should be reviewed using the Standards Development process prior to transition to a Technical Rationale document.

Standards Grading Metrics

The NERC SC endorsed the initial grading system for standards as a metric on March 9, 2016. The grading activity was directed by the NERC Board and is conducted by the Periodic Review Standing Review Team (PRSRT) as set forth in the Periodic Review process.³ The PRSRT is comprised of the following:

- SRT chair: SC chair or (or SC chair delegate)
- Operating Committee (OC) chair (or OC chair delegate)
- Planning Committee (PC) chair (or PC chair delegate)
- NERC staff
- Representation from the Regional Entities

The grading metrics include possible scores of 0-3 for quality and 0-13 for content. The set of standards chosen each year for grading, according to the criteria in the above section, will be graded to prioritize, and be a factor in determining the sequence they should enter into the Periodic Review process. At least one industry comment period will take place to allow industry to comment on the grading performed by the PRSRT. The grades, based on the PRSRT and any industry input, will be finalized, appended to the RSDP, and used to complete the prioritization each year. Additionally, input from other standards projects such as the Standards Efficiency Review, are being considered and coordinated with the Standards Grading activities.

³ The process is detailed in the Periodic Review template which is available at:
<https://www.nerc.com/pa/Stand/Resources/Documents/Periodic%20Review%20Template%20Feb%202016.pdf>.

Attachment 1: Final Grades for Standards Considered in 2018

The PRSRT was tasked with using metrics from the 2013 Independent Experts Review Panel to assign numeric grades to instruct future Periodic Review teams.

While the PRSRT’s final standards grades are important data points for the Periodic Reviews to consider, they are intended as one of many inputs to facilitate discussion during the reviews. Detailed analysis and background information on the Standards Grading process and PRSRT recommendations for periodic review project prioritization based on 2018 grades are posted on the [project page](#).

Standard & Requirement	Content Average	Quality Average
CIP-014-2 R1.	2.25	12.25
CIP-014-2 R2.	2.75	12.75
CIP-014-2 R3.	3.00	12.25
CIP-014-2 R4.	2.75	13.00
CIP-014-2 R5.	2.75	12.50
CIP-014-2 R6.	2.75	12.25
COM-002-4 R1.	2.75	12.25
COM-002-4 R2.	2.75	12.50
COM-002-4 R3.	2.25	12.00
COM-002-4 R4.	2.75	12.25
COM-002-4 R5.	3.00	12.50
COM-002-4 R6.	2.75	12.50
COM-002-4 R7.	3.00	12.50
FAC-003-4 R1.	3.00	12.75
FAC-003-4 R2.	3.00	12.00
FAC-003-4 R3.	3.00	12.75
FAC-003-4 R4.	3.00	12.25
FAC-003-4 R5.	3.00	12.75
FAC-003-4 R6.	3.00	12.50
FAC-003-4 R7.	2.75	12.75
FAC-013-2 R1.	2.75	12.25
FAC-013-2 R2.	2.75	12.25
FAC-013-2 R3.	3.00	13.00
FAC-013-2 R4.	2.50	12.25
FAC-013-2 R5.	2.75	12.25
FAC-013-2 R6.	3.00	12.25
IRO-006-5 R1.	3.00	12.75
MOD-020-0 R1.	2.75	12.50
MOD-025-2 R1.	3.00	12.25
MOD-025-2 R2.	3.00	12.50
MOD-025-2 R3.	3.00	12.50
MOD-026-1 R1.	3.00	13.00
MOD-026-1 R2.	3.00	12.25
MOD-026-1 R3.	2.75	12.50

Standard & Requirement	Content Average	Quality Average
MOD-026-1 R4.	2.75	12.75
MOD-026-1 R5.	2.75	13.00
MOD-026-1 R6.	3.00	13.00
MOD-027-1 R1.	3.00	12.75
MOD-027-1 R2.	3.00	12.25
MOD-027-1 R3.	2.75	12.50
MOD-027-1 R4.	2.75	12.75
MOD-027-1 R5.	2.25	12.75
MOD-028-2 R1.	3.00	12.50
MOD-028-2 R10.	3.00	12.50
MOD-028-2 R11.	3.00	12.50
MOD-028-2 R2.	3.00	12.50
MOD-028-2 R3.	3.00	12.50
MOD-028-2 R4.	3.00	12.50
MOD-028-2 R5.	3.00	12.50
MOD-028-2 R6.	3.00	12.50
MOD-028-2 R7.	3.00	12.50
MOD-028-2 R8.	3.00	12.50
MOD-028-2 R9.	3.00	12.50