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

| | | |
|---|---|---|
| **North American Electric Reliability Corporation** | **)** **)** | **Docket Nos. RM05-17-000** **RM05-25-000** **RM06-16-000** |

# NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION INFORMATIONAL FILING OF RELIABILITY STANDARDS DEVELOPMENT PLAN 2022–2024

Lauren A. Perotti
Senior Counsel
North American Electric Reliability Corporation
1325 G Street, N.W., Suite 600
Washington, DC 20005
(202) 400-3000
(202) 644-8099 – facsimile
lauren.perotti@nerc.net

*Counsel for the North American Electric Reliability Corporation*

November 30, 2021

**TABLE OF CONTENTS**

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

| | | |
|---|---|---|
| **North American Electric Reliability Corporation** | **)** **)** | **Docket Nos. RM05-17-000** **RM05-25-000** **RM06-16-000** |

# NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION INFORMATIONAL FILING OF RELIABILITY STANDARDS DEVELOPMENT PLAN 2022–2024

The North American Electric Reliability Corporation ("NERC") hereby submits its 2022–2024 Reliability Standards Development Plan ("2022 Development Plan") in accordance with Section 310 of the NERC Rules of Procedure.[1] The 2022 Development Plan, included herein as **Attachment A**, provides a status update on active development projects, a forecast of future work to be undertaken by NERC and its stakeholders 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 2022 Development Plan, subject to the inclusion of several new projects, on November 4, 2021. NERC submits this filing and the attached 2022 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 year's plan. *See* NERC's Rules of Procedure, accessible online at: https://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:

Lauren A. Perotti
Senior Counsel
North American Electric Reliability Corporation
1325 G Street, N.W., Suite 600
Washington, DC 20005
(202) 400-3000
lauren.perotti@nerc.net

## 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 2022–2024 version of the plan is presented in this filing. Consistent with previous versions, the 2022 Development Plan is filed for informational purposes and no specific Commission action is requested at this time.

The 2022 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 communication 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 2022 Development Plan. As detailed in Section III, NERC submits this filing to summarize the 2022 Development

Plan and inform the Commission and other interested parties of projects noted in the 2021 Development Plan that will continue into 2022.

## III. 2022 DEVELOPMENT PLAN

### A. Summary of the 2022 Development Plan

The 2022 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 2022 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 2022 may require flexibility in planning to ensure that activities are given appropriate resources and priority.

The 2022 Development Plan builds upon the work of previous years, while adding new projects intended to address new and emerging reliability risks and issues. While most of the work in the next three years will focus on new Standards Authorization Requests, Periodic Reviews, and Standards Efficiency Review implementation, projects to develop new or revised Reliability Standards may be initiated in response to Commission directives or to address new or emerging risks. Periodic Reviews will be aligned with the strategic consideration of reviewing standard families that are interrelated. The Standards Grading efforts for 2020 and 2021 have been completed and results are included.

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. 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.

### B. 2021 Progress Report

The 2021 Development Plan identified standard development projects that would be initiated in 2021 or continue from 2020. 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. Standards Projects Completed in 2021

Several projects (or portions of projects) identified in the 2021 Development Plan were completed in 2021. These projects, along with when the associated standard(s), were adopted by the NERC Board of Trustees and are identified below:[3]

- Project 2015-09 Establish and Communicate System Operating Limit (adopted by the NERC Board in May 2021)
- Project 2019-02-BES Cyber System Information Access Management (adopted by NERC Board in August 2021)
- Project 2019-06 Cold Weather (adopted by the NERC Board in June 2021)

#### 2. Projects Continuing in 2022

The following standard development projects identified in the 2021 Development Plan will continue into 2022:

- Project 2016-02 Modifications to CIP Standards
- Project 2017-01 Modifications to BAL-003-1.1 (phase 2)

---

[2] NERC Reliability Standards, https://www.nerc.com/pa/Stand/Pages/default.aspx.

[3] Two projects which were identified in the 2021-2023 Reliability Standards Development Plan were terminated following the filing of that plan. Project 2020-01 Modifications to MOD-032-1 was terminated in December 2020. Project 2019-05 Modifications to PER-003-2 was terminated in July 2021.

- Project 2019-04 Modifications to PRC-005-6
- Project 2020-02 Transmission-connected Dynamic Reactive Resources
- Project 2020-03 Supply Chain Low Impact Revisions
- Project 2020-04 Modifications to CIP-012
- Project 2020-05 Modifications to FAC-001-3 and FAC-002-2
- Project 2020-06 Verifications of Models and Data for Generators

Additionally, the following projects, which began in 2021, will continue into 2022:

- Project 2021-01 Modifications to MOD-025 and PRC-019
- Project 2021-02 Modifications to VAR-002
- Project 2021-03 CIP-002 Transmission Owner Control Centers
- Project 2021-04 Modifications to PRC-002-2
- Project 2021-05 Modifications to PRC-023
- Project 2021-06 Modifications to IRO-010 and TOP-003
- Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination
- Project 2021-08 Modifications to FAC-008

Each of these projects is identified and prioritized in the 2022 Development Plan, as described in the following section. No Reliability Standards are due for periodic review in 2022.

3. Standards Efficiency Review

In 2021, work also continued to implement the recommendations of the NERC Standards Efficiency Review. In 2018, NERC began using both internal ERO Enterprise resources and industry resources to evaluate candidates for potential Reliability Standard retirements under the Standards Efficiency Review project. 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. Through open and transparent industry participation, the Standards Efficiency Review teams submitted a Standard Authorization Request to the Standards Committee in order to implement recommended changes to the body of Reliability Standards. The resulting project retired numerous standards and requirements no longer needed for reliability in 2019.

Additionally, the Standards Efficiency Review working team reviewing the Critical Infrastructure Protection ("CIP") Reliability Standards identified a list of three recommended retirements and six modifications. The team determined that there was not sufficient justification for retiring requirements that outweighed the reliability and security benefits of the requirements, particularly in light of past FERC directives and the evolving nature of cyber security. Therefore, the working team decided to change their focus and be more strategic. The overall recommendation from the CIP Standards Efficiency Review working team is for industry to create an initiative to align the CIP Standards with the results-based framework. The timing, scope, and participants of a CIP standards alignment initiative will be determined at a later date. The alignment initiative will consider observations made by the Standards Committee Process Subcommittee evaluation of standards template or drafting team process changes.

### C. Prioritization of 2022 Projects

Each new or continuing Reliability Standard Project identified in the 2022 Development Plan has been 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 2022 Development Plan and their assigned priority category are provided below.

**High Priority**

- Project 2016-02 Modifications to CIP Standards
- Project 2020-03 Supply Chain Low Impact Revisions
- Project 2020-04 Modifications to CIP-012
- Project 2021-03 CIP-002 Transmission Owner Control Centers
- Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination

**Medium Priority**

- Project 2017-01 Modifications to BAL-003-1.1 (phase 2)

**Low Priority**

- Project 2019-04 Modifications to PRC-005-6
- Project 2020-02 Transmission-connected Dynamic Reactive Resources
- Project 2020-05 Modifications to FAC-001-3 and FAC-002-2
- Project 2020-06 Verifications of Models and Data for Generators
- Project 2021-01 Modifications to MOD-025 and PRC-019
- Project 2021-02 Modifications to VAR-002
- Project 2021-04 Modifications to PRC-002-2
- Project 2021-05 Modifications to PRC-023
- Project 2021-06 Modifications to IRO-010 and TOP-003

- Project 2021-08 Modifications to FAC-008

Currently, no Reliability Standards are due for periodic review in 2022. The Periodic Reviews will coordinate timing with any subsequent work under the Standards Efficiency Review project to ensure the initiatives work together to review the standards that may need to be modified.

Other projects may be initiated in 2022 based on new Standard Authorization Requests, including those being developed by the Reliability and Security Technical Committee, emerging risks to the Bulk-Power System, or new regulatory directives.

## IV. CONCLUSION

As discussed above, the 2022 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 2022 Development Plan for informational purposes only.

Respectfully submitted,

*/s/ Lauren A. Perotti*

Lauren A. Perotti
Senior Counsel
North American Electric Reliability Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
lauren.perotti@nerc.net

*Counsel for the North American Electric Reliability Corporation*

Date: November 30, 2021

## 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 30th day of November, 2021.

*/s/ Lauren A. Perotti*

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

# ATTACHMENT A

# RELIABILITY STANDARDS DEVELOPMENT PLAN

# 2022–2024

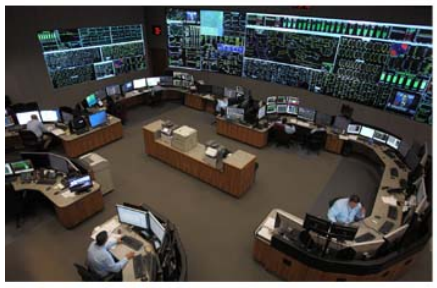
NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

# Reliability Standards Development Plan

2022-2024

November 4, 2021

**RELIABILITY | RESILIENCE | SECURITY**




**3353 Peachtree Road NE**
**Suite 600, North Tower**
**Atlanta, GA 30326**
**404-446-2560 | www.nerc.com**

# Table of Contents

# Background

As described herein, this Reliability Standards Development Plan (RSDP) builds upon the goals of the previous RSDPs. 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 2022-2024 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.

This RSDP contemplates that the work of the Reliability and Security Technical Committee (RSTC) and working groups thereunder may result in more Standard Authorization Requests(SARs) and subsequent standards projects. It also important to note that projects may be generated through the use of the ERO risk framework.

Periodic Reviews and initiatives, such as the final recommendations of the Standards Efficiency Review (SER) project, also enable NERC to identify requirements that do little to promote reliability, and should therefore be retired. 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.[1] The Standards Grading efforts for 2020 and 2021 have been completed and results are included.

While most of the work in the next three years will focus on new SARs, 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 the 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 RSTC. 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.

# Progress Report

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

## FERC Directives

As of June 30, 2021, there are two[2] outstanding directives being resolved through the standards development process. The status of the Standards directives are reported quarterly to the NERC Board of Trustees (Board).

### Continuing Projects

All of the other projects from the previous RSDP are complete or expected to be complete this year, except the following, which will continue into 2022:

1. Project 2016-02 Modifications to CIP Standards
2. Project 2017-01 Modifications to BAL-003-1.1 (phase 2)
3. Project 2019-04 Modifications to PRC-005-6
4. Project 2020-02 Transmission-connected Dynamic Reactive Resources
5. Project 2020-03 Supply Chain Low Impact Revisions
6. Project 2020-04 Modifications to CIP-012
7. Project 2020-05 Modifications to FAC-001-3 and FAC-002-2
8. Project 2020-06 Verifications of Models and Data for Generators
9. Project 2021-01 Modifications to MOD-025 and PRC-019
10. Project 2021-02 Modifications to VAR-002
11. Project 2021-03 CIP-002 Transmission Owner Control Centers
12. Project 2021-04 Modifications to PRC-002-2
13. Project 2021-05 Modifications to PRC-023
14. Project 2021-06 Modifications to IRO-010 and TOP-003
15. Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination
16. Project 2021-08 Modifications to FAC-008

Additional project information is available on the NERC website on the Standards web page.[3] 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 in 2019. The first phase of Standards retirements for SER is complete, and any future development will continue into 2022.

**The following projects have been or are planned to be completed in 2021** (actual and anticipated Board adoption dates are noted):

[2] The following projects are currently modifying standards to address directives: 2020-04 Modifications to CIP-012 (requirement for protections regarding the availability of communication links and data communicated between bulk electric system Control Centers). The second directive is a requirement to submit project schedules for two ongoing CIP projects.

[3] As of the date of publication, the subject web page resides at http://www.nerc.com/pa/Stand/Pages/default.aspx.

1. Project 2015-09 Establish and Communicate System Operating Limits (adopted by the NERC Board in May 2021)
2. Project 2019-02-BES Cyber System Information Access Management (adopted by NERC Board in August 2021)
3. Project 2019-06 Cold Weather (adopted by the NERC Board in June 2021)

# 2022 Projects

## Projects Continuing into 2022

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 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination (drafting estimated to be completed in phases over 2022-2023; first phase expected to be complete by September 2022 requiring subject matter experts for approximately 205 work hours each for the remaining part of this project)
- Project 2020-04 Modifications to CIP-012 (drafting estimated to be completed by May 2022 requiring approximately 8 industry subject matter experts for approximately 100 work hours each for the remaining part of this project)
- Project 2020-03 Supply Chain Low Impact Revisions (drafting estimated to be completed by May 2022 requiring approximately 10 industry subject matter experts for approximately 120 work hours each for the remaining part of this project)
- Project 2021-03 CIP-002 Transmission Owner Control Centers (drafting estimated to be completed by May 2022 requiring approximately 10 subject matter experts for approximately 40 work hours each for this project)
- Project 2016-02 Modifications to CIP Standards (drafting estimated to be completed by February 2022 requiring approximately 9 industry subject matter experts for approximately 120 work hours each for the remaining part of this project)

### Medium Priority

- Project 2017-01 Modifications to BAL-003-1.1 (phase 2) (drafting estimated to be completed by February 2022 requiring approximately 10 subject matter experts for approximately 40 work hours each for this project)

### Low Priority

- Project 2019-04 Modifications to PRC-005-6 (drafting estimated to be completed by December 2022 requiring approximately eight subject matter experts for approximately 40 work hours each for this project)

- Project 2020-02 Transmission-connected Dynamic Reactive Resources (drafting estimated to be completed by December 2022 requiring approximately 10 subject matter experts for approximately 40 work hours each for this project)
- Project 2020-05 Modifications to FAC-001-3 and FAC-002-2 (drafting estimated to be completed by May 2022 requiring approximately 10 subject matter experts for approximately 60 work hours each for this project)
- Project 2020-06 Verifications of Models and Data for Generators (drafting estimated to be completed by May 2022 requiring approximately 10 subject matter experts for approximately 40 work hours each for this project)
- Project 2021-01 Modifications to MOD-025 and PRC-019 (drafting estimated to be completed by May 2023 requiring approximately 10 subject matter experts for approximately 40 work hours each for this project)
- Project 2021-02 Modifications to VAR-002 (drafting estimated to be completed by May 2022 requiring approximately 10 subject matter experts for approximately 40 work hours each for this project)
- Project 2021-04 Modifications to PRC-002-2 (drafting estimated to be completed by May 2022 requiring approximately 10 subject matter experts for approximately 40 work hours each for this project)
- Project 2021-05 Modifications to PRC-023 (drafting estimated to be completed by May 2022 requiring approximately 10 subject matter experts for approximately 40 work hours each for this project)
- Project 2021-06 Modifications to IRO-010 and TOP-003 (drafting estimated to be completed by November 2022 requiring approximately 10 subject matter experts for approximately 40 work hours each for this project)
- Project 2021-08 Modifications to FAC-008 (drafting estimated to be completed by November 2022 requiring approximately 10 subject matter experts for approximately 40 work hours each for this project)

# Other Projects Continuing into 2022

## NERC Reliability Standards Efficiency Review Transition

In 2018, NERC began using both internal ERO Enterprise resources and industry resources to evaluate candidates for potential Reliability Standard 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 effort retired numerous standards and requirements in 2019. The Standards Efficiency Review Report and Transition Plan outlines the Phase 1 and Phase 2 work and the additional recommendations.

As a part of the SER, the CIP SER working team evaluated the set of CIP Standards and identified a list of three recommended retirements and six modifications. The team determined that there was not sufficient justification for retiring requirements that outweighed the reliability and security benefits of the requirements, particularly in light of past FERC directives and the evolving nature of cyber security. Therefore, the working team decided to change their focus and be more strategic. The overall recommendation from the CIP SER working team is for industry to create an initiative to align the CIP Standards with the results-based framework.[4] The timing, scope, and participants of a CIP standards alignment initiative will be determined at a later date. The alignment initiative will consider observations made by the Standards Committee Process Subcommittee (SCPS) evaluation of standards template or drafting team process changes.

The SER Advisory Group recognized that Reliability Standards efficiency should be an ongoing priority. As a result, two final recommendations were created: (1) Post recommended standards modifications from SER Phase 1, Phase 2 and CIP SER on the NERC website for consideration by existing and future SDTs and Periodic Review Teams (2) The SCPS, in coordination with the SC and NERC staff, will perform a comprehensive assessment and propose identified enhancements in the standards development and review processes to engrain efficiency principles.

NERC will continue to coordinate with the industry team to ensure all of the information developed through previous Standards Grading efforts, which includes consideration of content, quality, cost, and reliability impact analysis, align with the SER transition and future development projects.

## Other Projects Commencing

Currently, no Reliability Standards are due for periodic review in 2022. The Periodic Reviews will coordinate timing with any subsequent phases of 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 2021.

[4] https://www.nerc.com/pa/Stand/Pages/CIP-Standards-Efficiency-Review.aspx

# 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.[5]The PRSRT is comprised of the following:

- SRT chair: SC chair or (or SC chair delegate)
- Two representatives from the Reliability and Security Technical (RSTC)
- Representation from the Regional Entities
- NERC staff

The grading metrics include possible scores of 0-4 for content and 0-13 for quality. 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.

[5] 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 2020

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 2020 grades are posted on the project page.

| 2020 Standards Grades | | | |
|---|---|---|---|
| **Standard** | **Requirement** | **Content Average** | **Quality Average** |
| COM-001-3 | R12. | 3.75 | 12.25 |
| COM-001-3 | R13. | 3.50 | 12.25 |
| IRO-001-4 | R1. | 3.25 | 12.25 |
| IRO-001-4 | R2. | 3.75 | 13.00 |
| IRO-001-4 | R3. | 3.75 | 13.00 |
| IRO-002-5 | R1. | N/A | N/A |
| IRO-002-5 | R2. | 3.25 | 11.25 |
| IRO-002-5 | R3. | 3.75 | 13.00 |
| IRO-002-5 | R4. | 4.00 | 13.00 |
| IRO-002-5 | R5. | 4.00 | 12.75 |
| IRO-002-5 | R6. | 4.00 | 13.00 |
| IRO-008-2 | R1. | 3.75 | 12.75 |
| IRO-008-2 | R2. | 4.00 | 12.75 |
| IRO-008-2 | R3. | 3.50 | 12.75 |
| IRO-008-2 | R4. | 3.75 | 12.50 |
| IRO-008-2 | R5. | 3.25 | 12.50 |
| IRO-008-2 | R6. | 3.50 | 12.50 |
| IRO-010-2 | R1. | 4.00 | 12.25 |
| IRO-010-2 | R2. | 3.75 | 12.75 |
| IRO-010-2 | R3. | 3.75 | 13.00 |
| IRO-014-3 | R1. | 4.00 | 12.50 |
| IRO-014-3 | R2. | 4.00 | 13.00 |
| IRO-014-3 | R3. | 4.00 | 12.75 |
| IRO-014-3 | R4. | 3.75 | 12.50 |
| IRO-014-3 | R5. | 3.75 | 12.75 |
| IRO-014-3 | R6. | 3.75 | 13.00 |
| IRO-014-3 | R7. | 3.50 | 9.75 |
| IRO-017-1 | R1. | 4.00 | 13.00 |
| IRO-017-1 | R2. | 3.75 | 12.50 |
| IRO-017-1 | R3. | 3.50 | 12.50 |
| IRO-017-1 | R4. | 3.50 | 12.25 |
| IRO-018-1(i) | R1. | 3.75 | 12.50 |
| IRO-018-1(i) | R2. | 3.75 | 12.75 |

| | | | |
|---|---|---|---|
| IRO-018-1(i) | R3. | 4.00 | 12.50 |
| TOP-001-4 | R1. | 3.75 | 12.75 |
| TOP-001-4 | R2. | 3.75 | 12.50 |
| TOP-001-4 | R3. | 3.75 | 12.75 |
| TOP-001-4 | R4. | 3.25 | 12.50 |
| TOP-001-4 | R5. | 3.50 | 12.50 |
| TOP-001-4 | R6. | 3.50 | 12.50 |
| TOP-001-4 | R7. | 3.50 | 9.75 |
| TOP-001-4 | R8. | 3.50 | 12.75 |
| TOP-001-4 | R9. | 3.25 | 12.00 |
| TOP-001-4 | R10. | 4.00 | 12.50 |
| TOP-001-4 | R11. | 4.00 | 13.00 |
| TOP-001-4 | R12. | 4.00 | 13.00 |
| TOP-001-4 | R13. | 3.75 | 12.75 |
| TOP-001-4 | R14. | 3.75 | 12.00 |
| TOP-001-4 | R15. | 3.75 | 12.00 |
| TOP-001-4 | R16. | 4.00 | 13.00 |
| TOP-001-4 | R17. | 3.75 | 12.75 |
| TOP-001-4 | R18. | 3.75 | 12.50 |
| TOP-001-4 | R19. | N/A | N/A |
| TOP-001-4 | R20. | 3.75 | 12.00 |
| TOP-001-4 | R21. | 4.00 | 13.00 |
| TOP-001-4 | R22. | N/A | N/A |
| TOP-001-4 | R23. | 3.75 | 12.25 |
| TOP-001-4 | R24. | 3.75 | 13.00 |
| TOP-002-4 | R1. | 4.00 | 13.00 |
| TOP-002-4 | R2. | 4.00 | 13.00 |
| TOP-002-4 | R3. | 3.50 | 13.00 |
| TOP-002-4 | R4. | 3.75 | 12.75 |
| TOP-002-4 | R5. | 3.50 | 13.00 |
| TOP-002-4 | R6. | 3.25 | 12.50 |
| TOP-002-4 | R7. | 3.25 | 12.50 |
| TOP-003-3 | R1. | 4.00 | 10.50 |
| TOP-003-3 | R2. | 4.00 | 10.50 |
| TOP-003-3 | R3. | 3.75 | 13.00 |
| TOP-003-3 | R4. | 3.75 | 13.00 |
| TOP-003-3 | R5. | 4.00 | 12.25 |
| TOP-010-1(i) | R1. | 4.00 | 11.25 |
| TOP-010-1(i) | R2. | 4.00 | 11.25 |
| TOP-010-1(i) | R3. | 4.00 | 12.00 |
| TOP-010-1(i) | R4. | 2.75 | 12.50 |

# Attachment 2: Final Grades for Standards Considered in 2021

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 2021 grades are posted on the project page.

| 2021 Standards Grades | | | |
|---|---|---|---|
| Standard | Requirement | Content Average | Quality Average |
| BAL-002-3 | R1. | 3.00 | 12.00 |
| BAL-002-3 | R2. | 4.00 | 12.33 |
| BAL-002-3 | R3. | 3.67 | 12.67 |
| BAL-005-1 | R1. | 4.00 | 13.00 |
| BAL-005-1 | R2. | 4.00 | 12.00 |
| BAL-005-1 | R3. | 4.00 | 13.00 |
| BAL-005-1 | R4. | 4.00 | 12.00 |
| BAL-005-1 | R5. | 4.00 | 12.00 |
| BAL-005-1 | R6. | 4.00 | 12.33 |
| BAL-005-1 | R7. | 4.00 | 12.67 |
| EOP-004-4 | R1. | 3.33 | 12.67 |
| EOP-004-4 | R2. | 3.33 | 13.00 |
| EOP-005-3 | R1. | 3.67 | 12.33 |
| EOP-005-3 | R2. | 3.67 | 12.67 |
| EOP-005-3 | R3. | 3.67 | 13.00 |
| EOP-005-3 | R4. | 4.00 | 12.00 |
| EOP-005-3 | R5. | 4.00 | 12.67 |
| EOP-005-3 | R6. | 4.00 | 12.67 |
| EOP-005-3 | R7. | 3.67 | 12.67 |
| EOP-005-3 | R8. | 4.00 | 13.00 |
| EOP-005-3 | R9. | 4.00 | 13.00 |
| EOP-005-3 | R10. | 4.00 | 12.67 |
| EOP-005-3 | R11. | 3.67 | 12.67 |
| EOP-005-3 | R12. | 3.67 | 13.00 |
| EOP-005-3 | R13. | 3.67 | 12.67 |
| EOP-005-3 | R14. | 3.67 | 12.67 |
| EOP-005-3 | R15. | 3.67 | 13.00 |
| EOP-005-3 | R16. | 3.67 | 12.67 |
| EOP-006-3 | R1. | 4.00 | 12.67 |
| EOP-006-3 | R2. | 3.67 | 12.67 |
| EOP-006-3 | R3. | 4.00 | 13.00 |
| EOP-006-3 | R4. | 4.00 | 13.00 |
| EOP-006-3 | R5. | 3.67 | 13.00 |

| | | | |
|---|---|---|---|
| EOP-006-3 | R6. | 4.00 | 12.67 |
| EOP-006-3 | R7. | 4.00 | 12.67 |
| EOP-006-3 | R8. | 3.67 | 12.67 |
| EOP-008-2 | R1. | 3.67 | 12.00 |
| EOP-008-2 | R2. | 4.00 | 12.67 |
| EOP-008-2 | R3. | 3.67 | 12.67 |
| EOP-008-2 | R4. | 3.67 | 12.67 |
| EOP-008-2 | R5. | 4.00 | 12.67 |
| EOP-008-2 | R6. | 4.00 | 12.33 |
| EOP-008-2 | R7. | 4.00 | 13.00 |
| EOP-008-2 | R8. | 3.67 | 12.33 |