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

**North American Electric Reliability)
Corporation)**

Docket No. RD20-2-000

**INFORMATIONAL FILING OF THE NORTH AMERICAN ELECTRIC RELIABILITY
CORPORATION REGARDING STANDARDS DEVELOPMENT PROJECTS**

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March 15, 2021

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Pursuant to paragraph 5 of the Order Directing Informational Filings Regarding NERC Standard Drafting Projects,¹ the North American Electric Reliability Corporation (“NERC”)² hereby submits to the Federal Energy Regulatory Commission (“FERC” or the “Commission”) an informational filing regarding two active Critical Infrastructure Protection (“CIP”) standard development projects: (1) Project 2016-02 – Modifications to CIP Standards (“Project 2016-02”); and (2) Project 2019-02 – BES Cyber System Information Access Management (“Project 2019-02”).³ Project 2016-02 focuses on modifications to the CIP Reliability Standards to incorporate applicable protections for virtualized environments. Project 2019-02 proposes to enhance the CIP standards by providing a secure path toward the use of third-party data storage and analysis systems and by clarifying the protections expected when using cloud computing services. This informational filing provides an update to the current schedules for both projects.

I. BACKGROUND

In the February 20 Order, the Commission directed NERC to submit, within 30 days of the issuance of the Order, an informational filing that includes project schedules for Projects 2016-02

¹ *N. Am. Elec. Reliability Corp.*, “Order Directing Informational Filings Regarding NERC Standard Drafting Projects,” 170 FERC ¶ 61,109 (Feb. 20, 2020) [hereinafter February 20 Order].

² The Commission certified NERC as the electric reliability organization (“ERO”) in accordance with Section 215 of the FPA on July 20, 2006. *N. Am. Elec. Reliability Corp.*, 116 FERC ¶ 61,062 (2006).

³ Unless otherwise designated, all capitalized terms shall have the meaning set forth in the *Glossary of Terms Used in NERC Reliability Standards*, https://www.nerc.com/files/Glossary_of_Terms.pdf.

and 2019-02.⁴ The Commission stated that these schedules should include the status of the projects, interim target dates, and the anticipated filing date for new or modified Reliability Standards. In addition, the Commission directed NERC to file quarterly informational status updates, beginning in June 2020, until NERC files new or modified standards with the Commission.⁵

NERC provided the initial informational filing regarding the schedules on March 19, 2020⁶ and three additional quarterly informational filings with updated schedules on June 19, 2020,⁷ September 17, 2020,⁸ and December 15, 2020.⁹ NERC also provided a supplemental informational filing on November 13, 2020.¹⁰

II. PROJECT SCHEDULES

The status of the projects, interim target dates, and the anticipated filing dates of the modified Reliability Standards for Projects 2016-02 remain unchanged from those reported in the November and December Informational Filings. The Project 2019-02 schedule, shown below, reflects earlier dates than reported in the November and December Informational Filings. NERC notes that these schedules are projections and subject to change. Any changes will be reported in the next informational filing scheduled for June 2021.

⁴ February 20 Order, *supra* note 1, at P 5.

⁵ *Id.*

⁶ NERC, *Informational Filing of the North American Electric Reliability Corporation Regarding Standards Development Projects*, Docket No. RD20-2-000 (March 19, 2020).

⁷ NERC, *Informational Filing of the North American Electric Reliability Corporation Regarding Standards Development Projects*, Docket No. RD20-2-000 (June 19, 2020).

⁸ NERC, *Informational Filing of the North American Electric Reliability Corporation Regarding Standards Development Projects*, Docket No. RD20-2-000 (September 17, 2020).

⁹ NERC, *Informational Filing of the North American Electric Reliability Corporation Regarding Standards Development Projects*, Docket No. RD20-2-000 (December 15, 2020) [hereinafter December Informational Filing].

¹⁰ NERC, *Supplemental Informational Filing of the North American Electric Reliability Corporation Regarding Standards Development Projects*, Docket No. RD20-2-000 (November 13, 2020) [hereinafter November Informational Filing].

Project 2019-02 BES Cyber System Information Access Management Schedule

- Additional 45-day formal comment period and ballot: To be posted ~~April~~ **March** 2021
- Additional 45-day formal comment period and ballot (if needed): To be posted ~~July~~ **June** 2021
- Final ballot: To be posted ~~September~~ **August** 2021
- NERC Board of Trustees Adoption: November 2021
- FERC Filing: December 2021

In addition, as noted in the November Informational Filing, NERC planned to develop a Compliance Monitoring and Enforcement Program (“CMEP”) Practice Guide regarding virtualization under the current CIP standards. To that end, NERC published three CMEP Practice Guides: (1) Virtual Network;¹¹ (2) Virtual Storage;¹² and (3) Virtual Systems.¹³ These CMEP Practice Guides provide guidance to ERO Enterprise CMEP staff when assessing a Responsible Entity’s applicable systems that incorporate virtualized technologies.

III. CONCLUSION

At the time of this filing, Project 2016-02 and Project 2019-02 remain on schedule as provided herein. If any changes occur to the projects’ status, target dates, or anticipated filing

¹¹ NERC, *ERO Enterprise CMEP Practice Guide: Assessment of Virtualized Networks* (Feb. 26, 2021), <https://www.nerc.com/pa/comp/guidance/CMEPPacticeGuidesDL/CMEP%20Practice%20Guide%20%20Virtual%20Network.pdf>.

¹² NERC, *ERO Enterprise CMEP Practice Guide: Assessment of Virtualized Storage* (Feb. 26, 2021), <https://www.nerc.com/pa/comp/guidance/CMEPPacticeGuidesDL/CMEP%20Practice%20Guide%20%20Virtual%20Storage.pdf>.

¹³ NERC, *ERO Enterprise CMEP Practice Guide: Assessment of Virtualized Systems* (Feb. 26, 2021), <https://www.nerc.com/pa/comp/guidance/CMEPPacticeGuidesDL/CMEP%20Practice%20Guide%20%20Virtual%20Systems.pdf>.

dates, NERC will provide these changes in its quarterly informational filings submitted pursuant to the directive in the February 20 Order.

Respectfully submitted,

/s/ Marisa Hecht

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*Counsel for the North American Electric
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March 15, 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 the above-referenced proceeding.

Dated at Washington, D.C. this 15th day of March, 2021.

/s/ Marisa Hecht

Marisa Hecht
*Counsel for North American
Electric Reliability Corporation*