

February 2024

From the Desk of the CEO 2024 Risk Elements-**Remote Connectivity** Remote Connectivity— CIP-005-7 R2 E-ISAC Celebrates 25-Year **Revised CIP Evidence Request Tool** Lee Recognized for Service to Board of Regents **Texas RE PUCT** Presentation **Upcoming ERO Outreach** 2024 Texas RE Outreach Standards Update **Texas RE Information** Click here to Subscribe to this Newsletter!

From the Desk of the CEO

In 2019, the North American Electric Reliability Corporation (NERC) and the Federal Energy Regulatory Commission (FERC) issued a report that recommended new cold weather Reliability Standards. Project 2019-06 was subsequently initiated, which contained a package of updates to standards that would be designed to help maintain reliability during extreme cold weather events, and the changes to EOP-011, IRO-010, and TOP-003 became effective in June of 2021. By design, standards projects take years to complete, giving industry opportunities to weigh in while the drafting teams consider utility, feasibility, and implementation. The results of all that time and effort is a more reliable grid, which we saw firsthand last month.

I think it is important to highlight when the grid is stressed but operates as expected and without interruption. Over the Martin Luther King, Jr. holiday a few weeks ago, Texas experienced prolonged subfreezing temperatures far below normal for our state. These temperatures pushed the interconnection to what likely will be a new January peak demand record, but throughout it all the grid performed well. This was due to industry doing its part to prepare for and execute during the cold weather.

Market participants in the Texas Interconnection have done a tremendous amount of work to prepare for extreme winter weather conditions in recent years. Requirements at the state and national level have been the impetus for some of these efforts, but responsibility for implementing weatherization plans falls to the entities themselves. At Texas RE we highlight some of these best practices during our annual Winter Weatherization Workshop, which will take place on October 2, 2024.

At the state level, the Public Utility Commission of Texas (PUCT) has worked to bolster grid reliability for the winter. Since 2021, the PUCT has used new weatherization requirements passed by the state legislature to ensure that generators are trained and equipped to withstand minimum operating



temperatures that are regionally specific across the state. Part of those requirements includes an expansion of ERCOT's annual inspection program to ensure that facilities are properly weatherized for extreme cold as well as provide a host of logistical support functions leading up to and during extreme events. For this winter they expected to perform 450 generation resource and transmission facility inspections, which is quite an undertaking.

Texas RE has also kept the PUCT wellinformed on electric reliability by filing important reports and assessments with the Commission throughout the year. Staff recently presented the findings from two key reports to the Commissioners at open meetings in November 2023 on the Inquiry into Bulk-Power System Operations During December 2022 Winter Storm Elliott and again recently at the beginning of February on the Blackstart and Next-Start Resource Availability in the Texas Interconnection report (read more on page 3). Providing data on the performance of the grid is one of Texas RE's core functions so that all stakeholders can work together to make sure Texans have access to power when they need it most.

There is one last stretch of winter ahead of us before spring brings shoulder month maintenance and preparations for summer. I hope everyone stays safe and prepared.

Reliably, Jim Albright

2024 Risk Elements—Remote Connectivity

By Erin Quigley, Risk Assessment Engineer

In October 2023, NERC and the Regional Entities released the 2024 Compliance Monitoring and Enforcement Program (CMEP) <u>Implementation Plan</u> (IP). The CMEP IP describes the risks that are priorities for a given year, which the ERO Enterprise uses to direct its monitoring and enforcement efforts.

One of the risk elements selected for 2024 is remote connectivity. Remote connectivity has been a risk element in the CMEP IP since 2021, representing a continued focus on the protection of critical infrastructure. This element highlights the risk that human performance plays in a cybersecurity environment. For example, in a highly secure environment personnel may be tempted to look for ways to circumvent security to make it easier or faster to complete their tasks. Shortcuts can lead to increased vulnerability from phishing and social engineering techniques that are becoming more sophisticated, potentially enabling unauthorized users to gain credentials to access BES facilities and BES Cyber Systems. There will always be potential for human error in any security system. The remote connectivity risk element gives Regional Entities a better understanding of how registered entities mitigate the risk of human error in their cybersecurity environments.

In the past, the remote connectivity risk element was only associated with two requirements: CIP-005-7 R2 and CIP-007-6 R3. In 2024, CIP-005-7 R3 and CIP-012-1 R1 were also associated with this risk element. Each of the risk elements is evaluated for applicability and considered as an input for every entity that receives an updated Compliance Oversight Plan (COP) in 2024.



As part of a risk element for 2024, registered entities with high and medium impact BCS who have engagements in 2024 may expect to see CIP-005-7 R2 and R3, CIP-007-6 R3, and CIP-012-1 R1 in their engagement scopes more frequently. This is a great opportunity for registered entities to share the internal controls their organizations have established to address the risk associated with remote connectivity.

For more information on the 2024 CMEP IP, NERC has posted a prerecorded webinar here.

Remote Connectivity—CIP-005-7 R2

By Devin Kitchens, Manger, CIP Compliance Monitoring

The risk element remote connectivity is related to several Critical Infrastructure Protection (CIP) Standards. However, it is generally associated with CIP-005-7 R2. The type of evidence requested when CIP-005-7 R2 is in scope for a compliance engagement could include (but is not limited to) what is listed on table 1.

Evidence required to gain reasonable assurance will vary depending on the Responsible Entity's documented process(es) and the specific facts and circumstances that pertain to the compliance engagement. For more information related to the types of evidence requested during compliance engagement, see the CIP Evidence Request Tool, which can be found on Texas RE's Compliance page and NERC's One-Stop Shop.

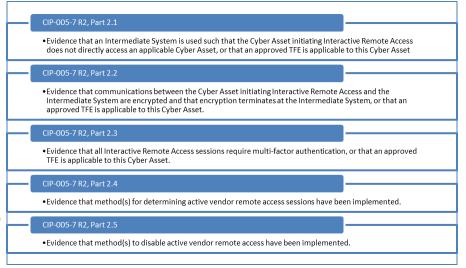


Table 1



E-ISAC Celebrates 25-Year Anniversary

This year marks the <u>25th anniversary</u> of the formation of NERC's Electricity Information Sharing and Analysis Center (E-ISAC). Established in 1999, the E-ISAC was created to reduce cyber and physical security risk to the North American electricity industry through information sharing, curated analysis, and security expertise. Since then, it has become a trusted source of information and has evolved to



meet a constantly changing threat landscape by expanding resources and adapting for a growing membership of approximately 1,800 electricity asset owners and operators, government, and cross-sector partners who share security threat intelligence.

Over the past 25 years, the E-ISAC's products and programs have grown to include industry alerts, webinars, bulletins, situational reports, monthly briefings, the Industry Engagement Program, and the <u>Vendor Affiliate Program</u>. In addition, the E-ISAC hosts conferences and events such as the annual grid security conference <u>GridSecCon</u>, physical security workshops, and the biennial <u>GridEx</u>, the largest grid security exercise in North America.

Revised CIP Evidence Request Tool

NERC recently posted a revised ERO Enterprise <u>CIP</u> <u>Evidence Request Tool</u> (ERT). The purpose of the CIP ERT is to help the ERO Enterprise with consistency and transparency in its audit approach. It will also help Responsible Entities (especially those that operate in multiple regions) fulfill these requests more efficiently by understanding what types of evidence are useful in preparation for an audit.

For more information on the CIP ERT, users may refer to the <u>user guide</u> or review the <u>list of changes</u> from the previous version.

Please contact compliance@texasre.org with any questions.

Texas RE PUCT Presentation

On February 1, 2024, Texas RE's President and Chief Executive Officer Jim Albright, Vice President and Chief Operating Officer Joseph Younger, and Chief Engineer and Director of Reliability Outreach Mark Henry appeared before the Public Utility Commission of Texas (PUCT) to deliver an update on the recently published FERC-NERC Blackstart Report, as well as on 2024 oversight priorities.

After an introduction from CEO Albright, COO Younger discussed the 2024 CMEP IP, which he described as having eight priorities that fit into two categories. First is energy risks, which are risks to operations and planning. The second category is security risks, both cyber and physical. Chief Engineer Henry then updated the Commissioners on the findings within the FERC-NERC Blackstart Report. For more information on that report, a recording of the recent Talk with Texas RE with guest speakers from FERC and NERC is available here.

The full commentary from Texas RE during the PUCT Open Meeting is available here.

Lee Recognized for Service to Board of Regents

Texas RE Independent Director Milton B. Lee has served on the University of North Texas System Board of Regents since 2013 and was recently recognized by Texas Governor Greg Abbott for his contributions to the state. The Board of Regents, the governing body for the University of North Texas System, is composed of nine distinguished and dedicated Texans who are appointed by the Governor of the State of Texas and confirmed by the Texas Senate. Throughout its history, the Board of Regents has been composed of ardent advocates for excellence in quality of education, research, service and leadership, supporting institutional and regional growth and success.





Upcoming ERO Events

Technical Talk with RF - February 12, 2024

On February 12, 2024, ReliabilityFirst will host a special state policy edition of Technical Talk with RF. The agenda includes a discussion on the current grid transformation and an update on FERC activities.



SERC Spring Reliability and Security Seminar – February 27-28, 2024

On February 27-28, 2024, SERC will host its Spring Reliability and Security Seminar. Discussions will focus on reliability and security of the bulk power system, lessons learned, and change and configuration management topics.



WECC Grid Fundamentals - February 27-28, 2024

Grid Fundamentals is a discussion series hosted by WECC to teach attendees about the importance of grid reliability. There are upcoming sessions on February 27 and on February 28.



MRO & CISA Defending Against Ransomware Webinar – February 29, 2024

On February 29, 2024, MRO is hosting a collaborative webinar addressing the crucial topic of "Defending Against Ransomware" in partnership with the Department of Homeland Security (DHS) Cybersecurity and Infrastructure Security Agency (CISA).



Upcoming Texas RE Events

Talk with Texas RE: CSIRP Planning and Testing - February 27, 2024

On February 27, 2024, starting at 1:30 p.m. Central, join Texas RE for a presentation on CIP-008-6 R1 and R2 which includes planning, testing, and activation of Responsible Entities' Cyber Security Incident Response Plans. The discussion will include best practices, internal controls, and potential pitfalls that may occur when implementing these Requirements.



2024 Women's Leadership in Grid Reliability & Security Conference - March 5, 2024

On March 5, 2024, starting at 10:00 a.m. Central, Texas RE will host the 2024 Women's Leadership in Grid Reliability & Security Conference. The Conference will feature a series of panels and presentations from women across North America who each day help to ensure the reliability of the BPS. Topics will include mentorship, career development, opportunities with the ERO Enterprise, and technical presentations on current issues facing the industry such as distributed energy resources and extreme weather.

Register | Agenda & Speaker Bios





2024 NERC Standards Review Forum (NSRF) Meetings

February 22 August 22

March 28 September 19

April 25 October 24

May 16 November 21

June 27

July 25

NERC

NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

2024 Critical Infrastructure Protection Working Group (CIPWG) Meetings

March 1 October 4

April 5 November 1

May 3 December 6

June 7

August 2

September 6



Standards Update

NERC Actions

On January 17, 2024, NERC filed an informational filing in response to Order No. 901 that provides a plan for development of new and revised Reliability Standards addressing high priority reliability risks associated with the rapid growth of inverter-based resources.

On January 18, 2024, NERC submitted the <u>Internal Network Security Monitoring Feasibility Study</u> (INSM) as directed by FERC in Order No. 887.



Current Standards Projects





February 2024



Upcoming Events



Current Openings



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