

TEXAS RE

2024 ERO Implementation Plan

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Upcoming Texas RE Events



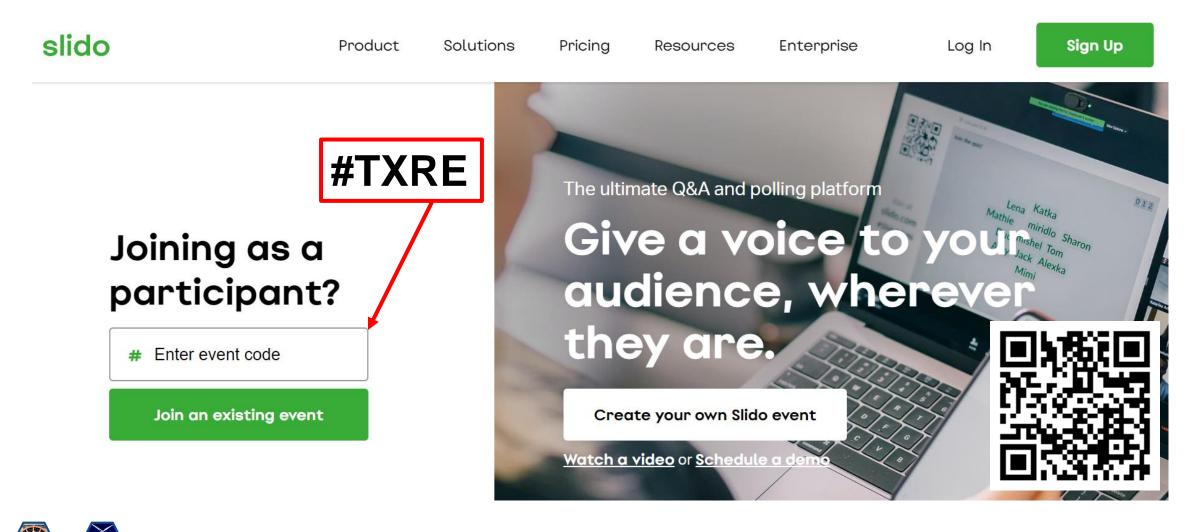


Upcoming ERO Events





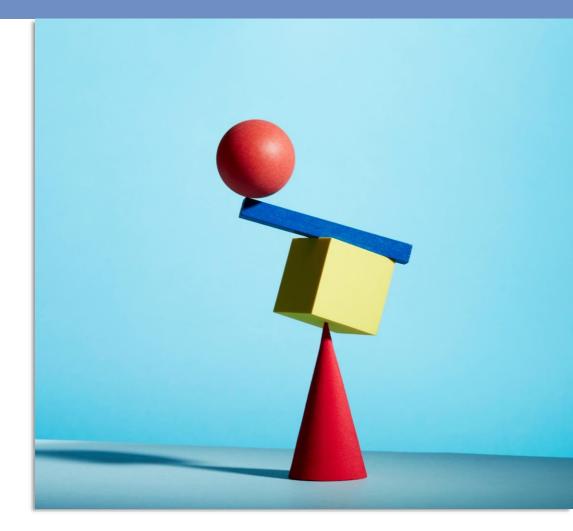
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CMEP Implementation Plan (CMEP IP) Purpose

- Reflects ERO and Regional Entity-specific risk elements that regions prioritize for oversight of registered entities
- Developed by NERC and the regional entities
- **Given State And State And**
 - 1. Changing Resource Mix
 - 2. Cybersecurity Vulnerabilities
 - 3. Resource Adequacy and Performance
 - 4. Critical Infrastructure Interdependencies





Risk Elements

Risk elements developed using:

- Compliance findings
- Recent event analysis
- Data analysis
- Committees
- Publications

Risk elements are considered when regions:

- Complete an Inherent Risk Assessment
- Complete a Compliance Oversight Plan
- Scope an engagement
 - Engagement team may use to focus on sampling and internal controls





Texas RE is completing Inherent Risk Assessments and Compliance Oversight Plans in Align



Current Risk Elements listed in Align



An Entity's Compliance Oversight Plans will reflect Risk Element considerations





What's New with Risk Elements?

| 2023 | 2024 |
|--------------------------|--------------------------|
| Remote Connectivity | Remote Connectivity |
| Supply Chain | Supply Chain |
| N/A | Physical Security |
| Incident Response | Incident Response |
| Stability Studies | Stability Studies |
| Inverter-Based Resources | Inverter-Based Resources |
| Facility Ratings | Facility Ratings |
| Cold Weather Response | Extreme Weather Response |



Focuses on the human element of security

How do entities manage the risk of remote connectivity and the complexity of the tasks the individuals perform?

| Standard | Requirement |
|-----------|-------------|
| CIP-005-7 | R2, R3 |
| CIP-007-6 | R3 |
| CIP-012-1 | R1 |

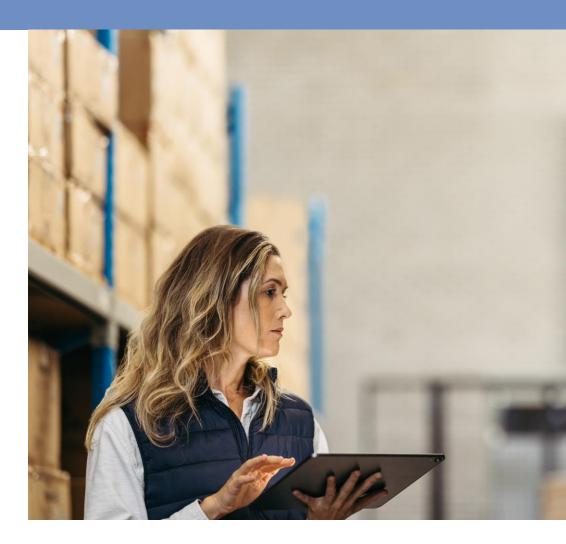




Supply Chain

 A growing risk and focal point
Various publications that highlight vendors, services, and products widely used

| Standard | Requirement |
|-----------|-------------|
| CIP-010-4 | R1 |
| CIP-013-2 | R1, R2 |



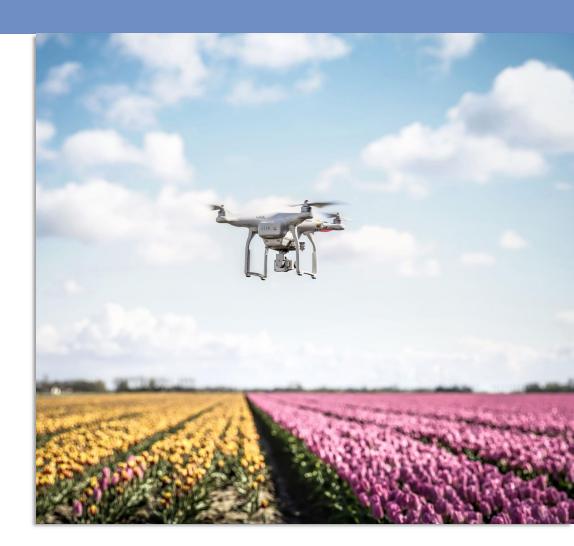


Incidents increasing

Many of the attacks have been against substations or distribution infrastructure

Potential use of drones for attacks

| Standard | Requirement |
|-----------|-------------|
| CIP-014-3 | R4, R5 |





Slido Question

Physical security is not related to cyber-security risks.

True or False?

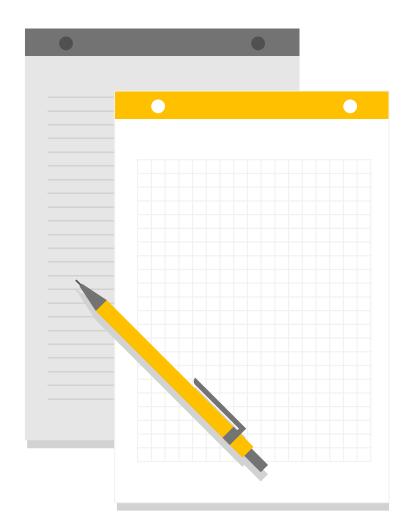




Efforts underway to develop cyber tools that should assist industry in enhancing preparation and reaction plans

Having and implementing a Cyber Security Incident response plan is important

| Standard | Requirement |
|-----------|-------------|
| CIP-008-6 | R1, R2, R3 |





Focuses on how the changing resource mix impacts operational and transmission planning

Reports have highlighted insufficient model quality checks

| Standard | Requirement |
|-------------|-------------|
| CIP-014-3 | R1 |
| TPL-001-4 | R4, R6 |
| TPL-001-5.1 | |





Recent events highlighted IBR risks

- Ride through capability during normal fault events
- Need to accurately model IBR characteristics
- Recent related NERC Alert

| Standard | Requirement |
|-----------|-------------|
| FAC-001-4 | R1, R2 |
| FAC-002-4 | R1, R2 |
| MOD-026-1 | R2 |
| PRC-024-3 | R1, R2 |

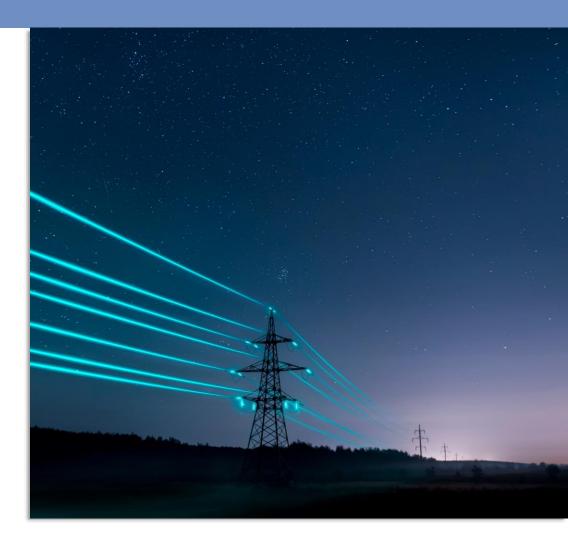




Facility Ratings

- ERO has released a guide on related best practices
- ERO is understanding more about controls entities have in place

| Standard | Requirement |
|-----------|-------------|
| FAC-008-6 | R6 |





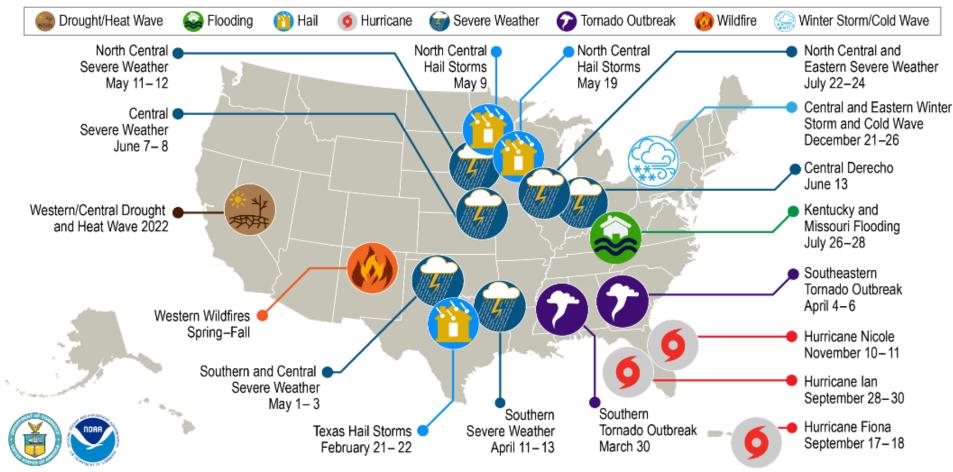
Replaces Cold Weather Response Risk Element

Extreme heat events have had impact on BPS

| Standard | Requirement |
|-----------|----------------------------|
| EOP-011-2 | R1, R2, R3, R6, R7, R8 |
| EOP-012-1 | R1, R2, R3, R4, R5, R6, R7 |
| TPL-007-4 | R1, R2, R4, R5, R7 |







This map denotes the approximate location for each of the 18 separate billion-dollar weather and climate disasters that impacted the United States in 2022.

Source: NOAA National Centers for Environmental Information (NCEI) U.S. Billion-Dollar Weather and Climate Disasters (2023) https://www.ncei.noaa.gov/access/billions/



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Slido Question

Which Risk Element do you think poses the most risk to your registered entity(ies)?

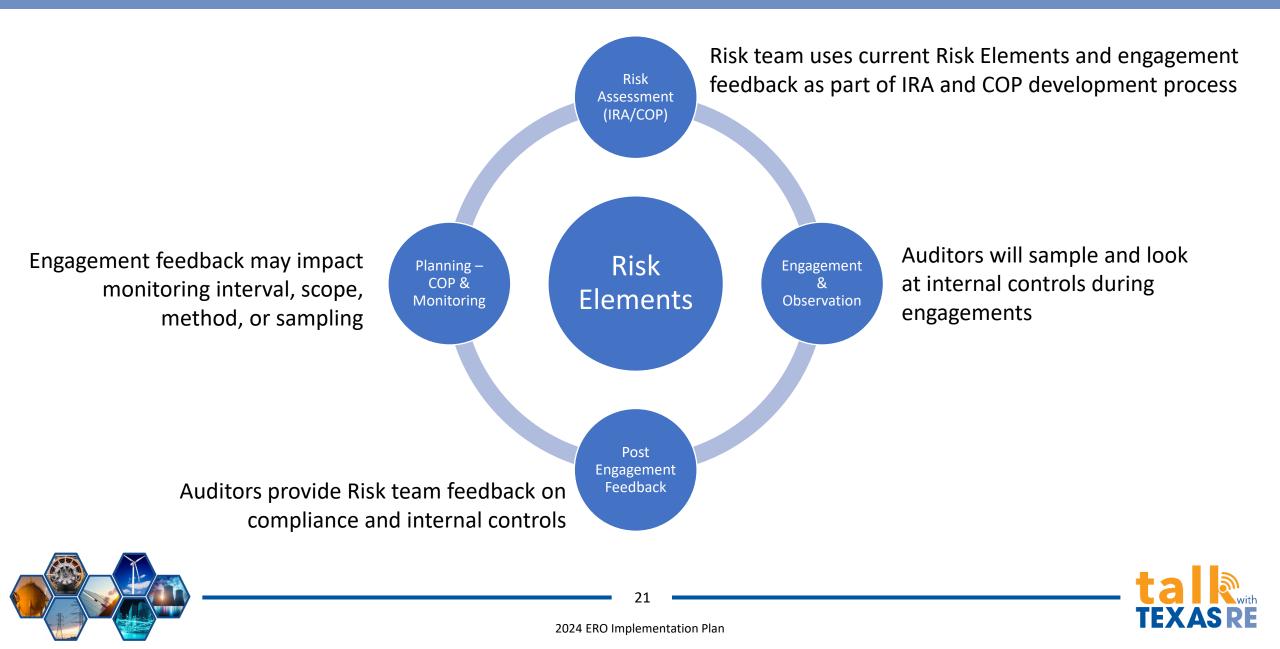
- □ Remote Connectivity
- □ Supply Chain
- Physical Security
- □ Incident Response
- □ Stability Studies
- □ Inverter-Based Resources
- □ Facility Ratings
- □ Extreme Weather Response







Tying it All Together



Questions?

