



**TEXAS RE**

# **Coordinated Oversight Program**

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&**

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**April 10, 2024**

# Antitrust Admonition

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**Notice of this meeting was posted on the Texas RE website and this meeting is being held in public. Participants should keep in mind that the listening audience may include members of the press, representatives from various governmental authorities, and industry stakeholders.**



# Upcoming Texas RE Events



April 15, 2024

Natural Gas & Power Industry  
Reliability Alliance



April 24, 2024

Spring Standards, Security, &  
Reliability Workshop



May 2, 2024

MOVEit Vulnerability



# Upcoming ERO Enterprise Events



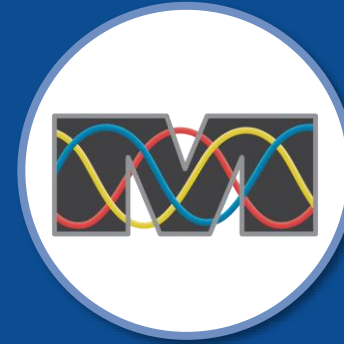
April 15, 2024

Technical Talk with RF



April 22-26, 2024

Electromagnetic Transient  
(EMT) Training Course



May 15, 2024

MRO Reliability Conference



**#TXRE**

## Joining as a participant?


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The ultimate Q&A and polling platform

# Give a voice to your audience, wherever they are.

[Create your own Slido event](#)

[Watch a video](#) or [Schedule a demo](#)




# Intro and Overview



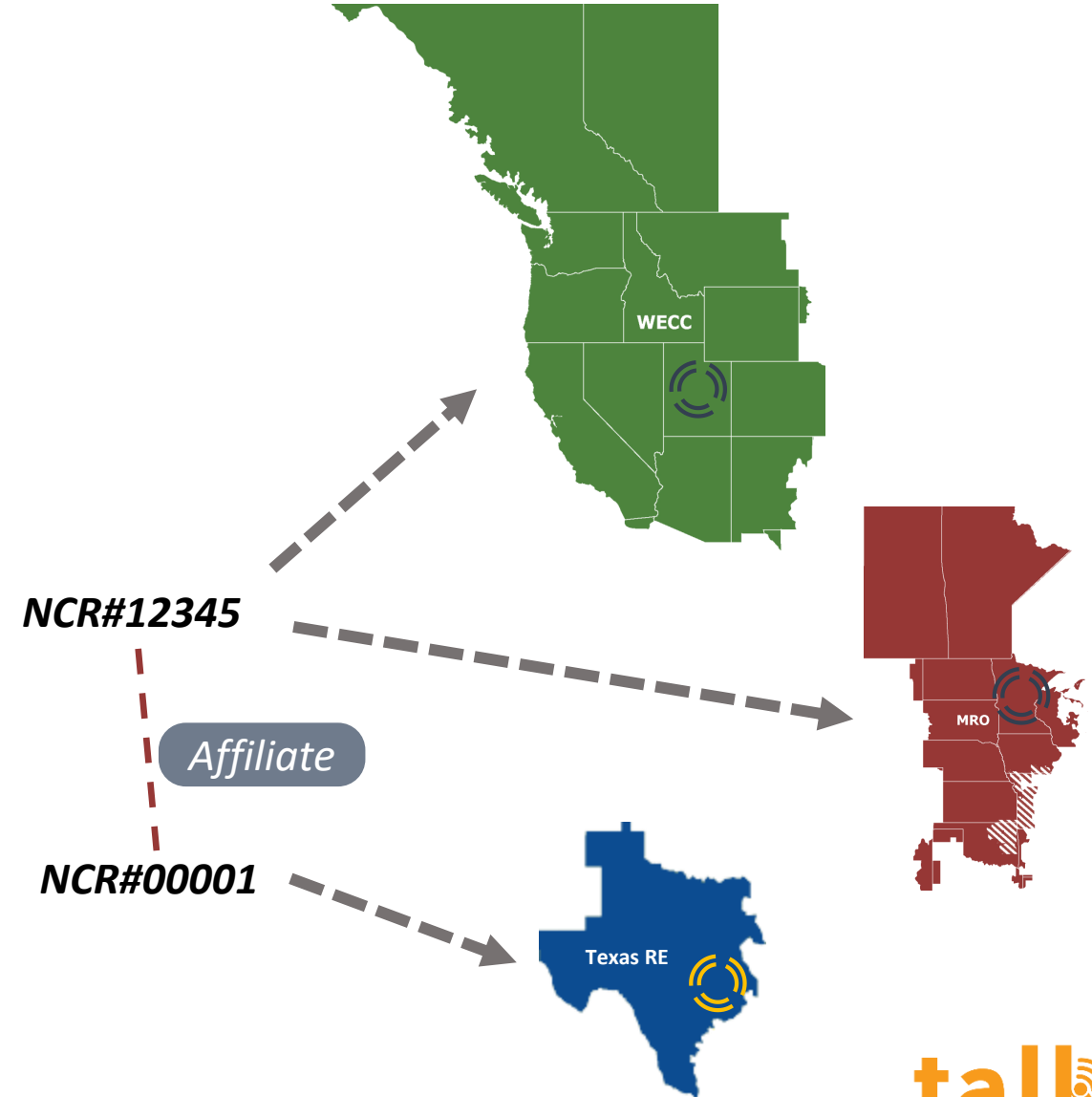
# Applicability

## Who is eligible?

A registered entity operating or owning assets in two or more Regional Entity territories is a potential candidate.

## You might be an ...

- Entity with two affiliated NCR#s owning assets in three Regional jurisdictions
- Entity with one NCR# owning assets in two Regional jurisdictions



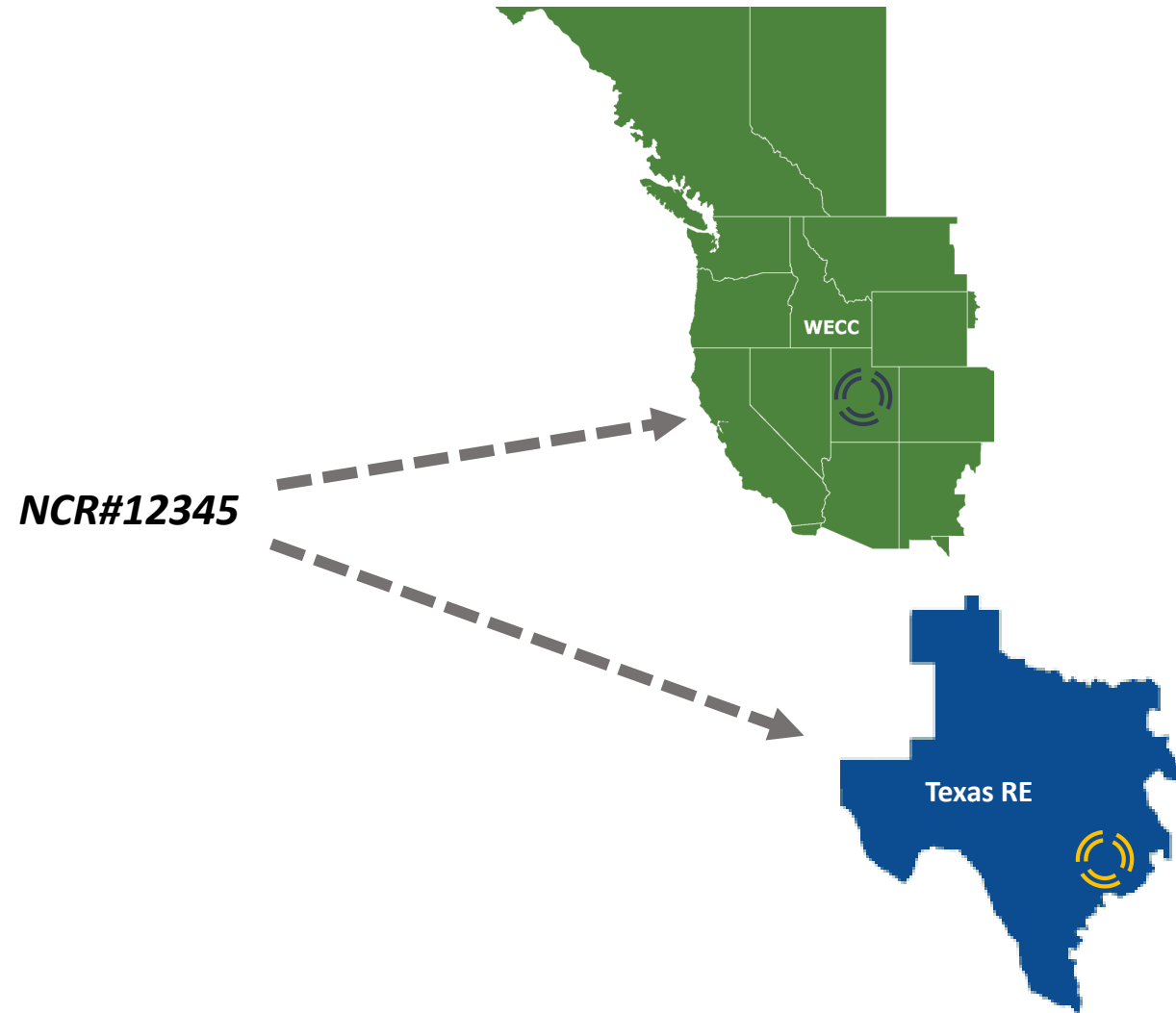
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# Form & Structure

## ☐ Lead Regional Entity (LRE)

- The Regional Entity selected by the Electric Reliability Organization (ERO) Enterprise to lead coordinated efforts related to oversight of an MRRE participating in the program.

## ☐ Affected Regional Entity (ARE)

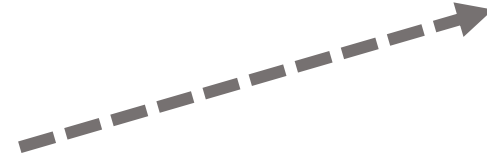
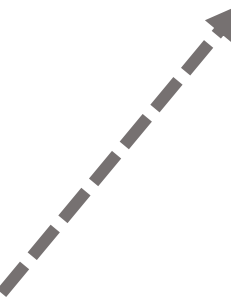
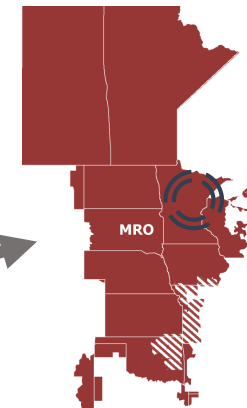
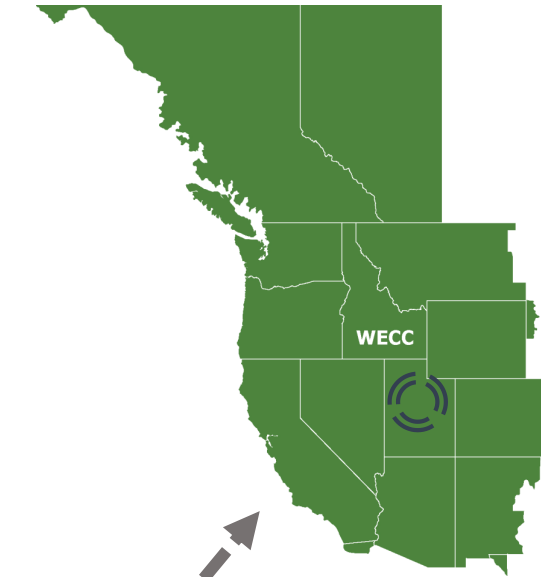
- Regional Entities who are not the LRE but that still cover part of the MRRE's footprint.

### Coordinate Oversight Group #1

NCR#12345

Affiliate

NCR#00002



# Form & Structure

## Entities in Coordinated Oversight

Could be a single entity, or a group of affiliated entities in a 'Coordinated Oversight Group'

NCR#00001

-OR-

Coordinate Oversight Group #1

NCR#12345

Affiliate

NCR#00002

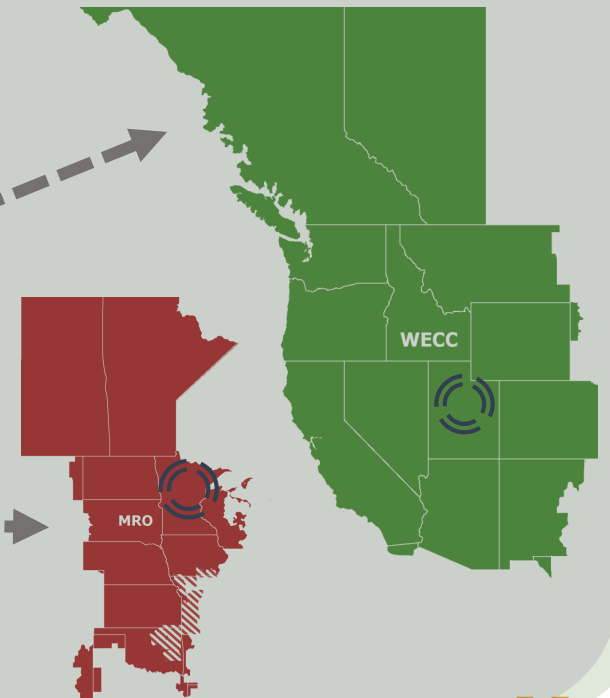
## Lead Regional Entity (LRE)

The Regional Entity selected by the ERO Enterprise to lead coordinated efforts related to oversight of a Multi-Region Registered Entity participating in the Program.



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## Lead Regional Entity (LRE)

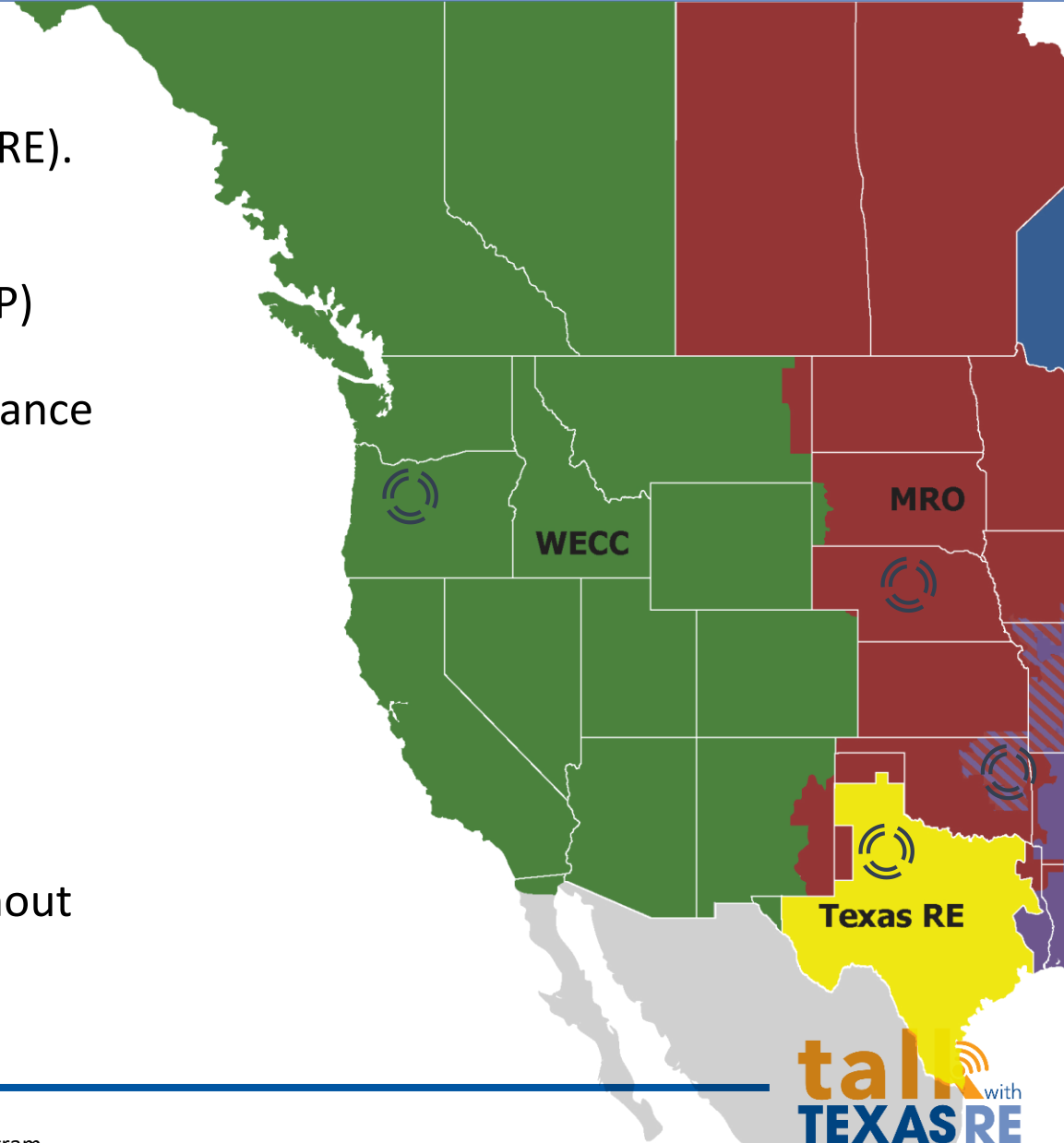
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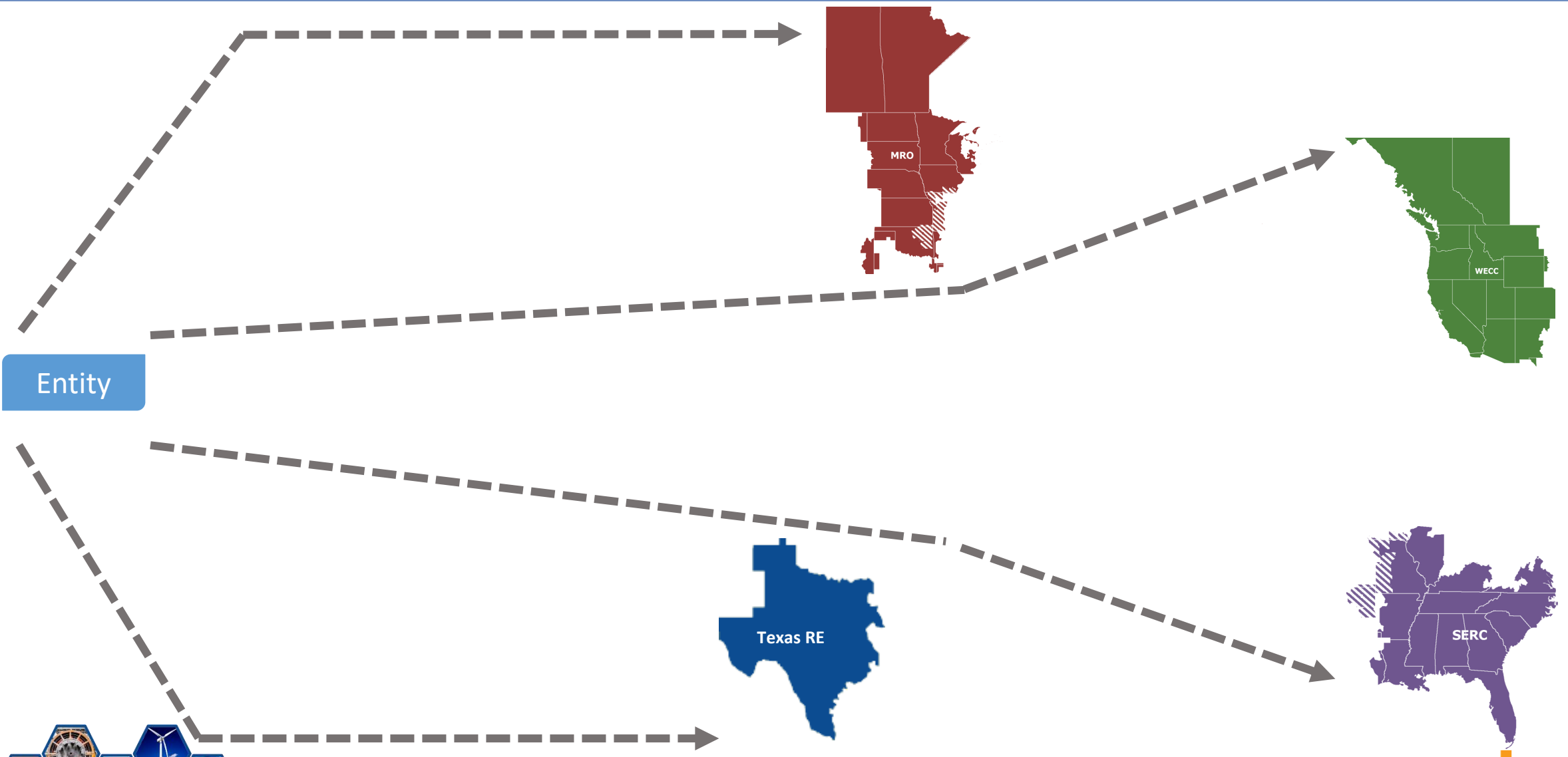
# Scenario

- ❖ You are the compliance staff of an entity (specifically, an MRRE).
- ❖ You discover an ongoing critical infrastructure protection (CIP) issue. Previously undiscovered issues in how baseline configurations were being captured presents a potential instance of noncompliance.
- ❖ Given that this issue involved assets at a central CIP control center, the impact extends across your footprint – including WECC, MRO, Texas RE, and SERC.

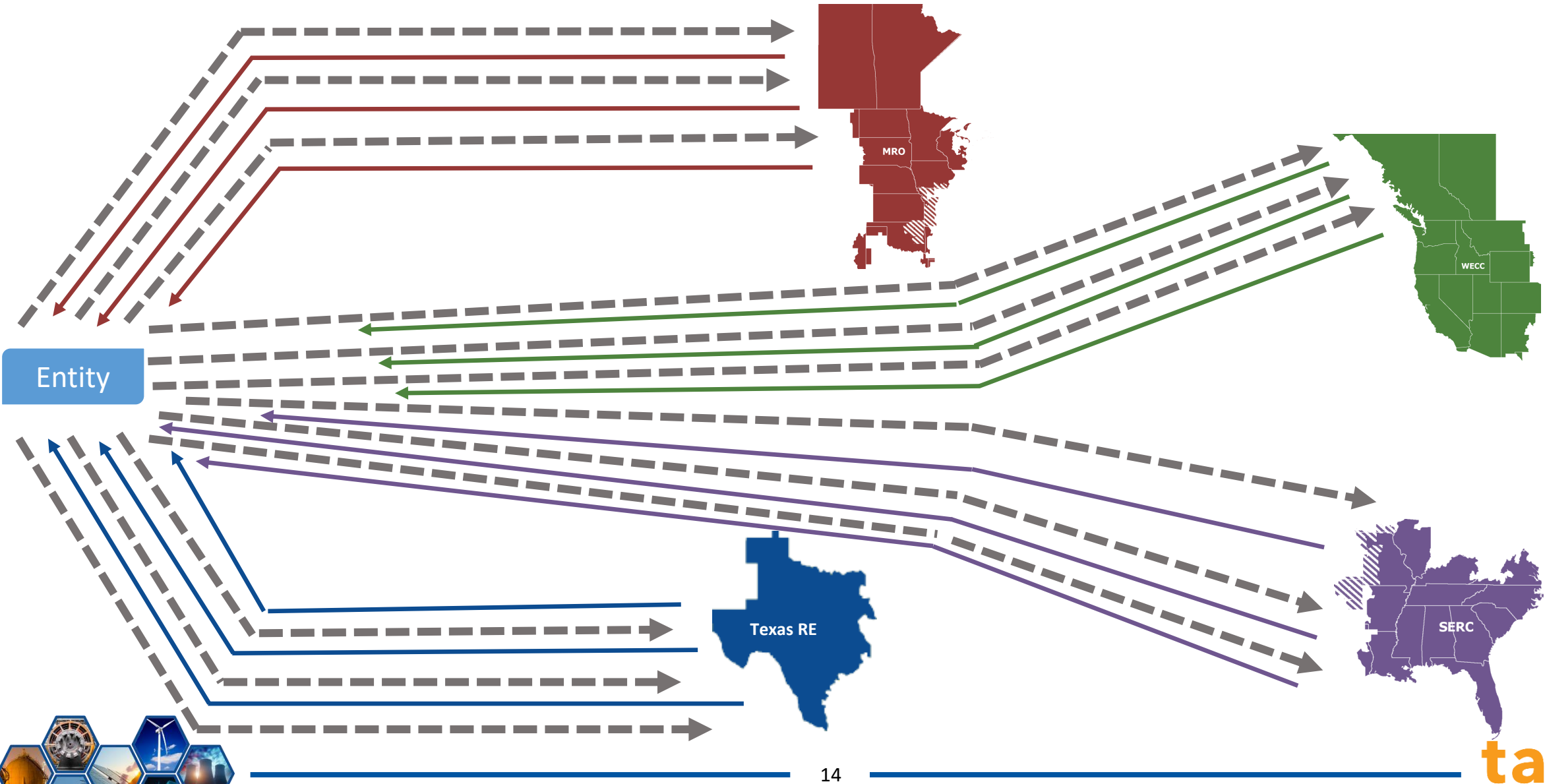
So, what would the compliance process look like with and without coordinated oversight?



# Examples



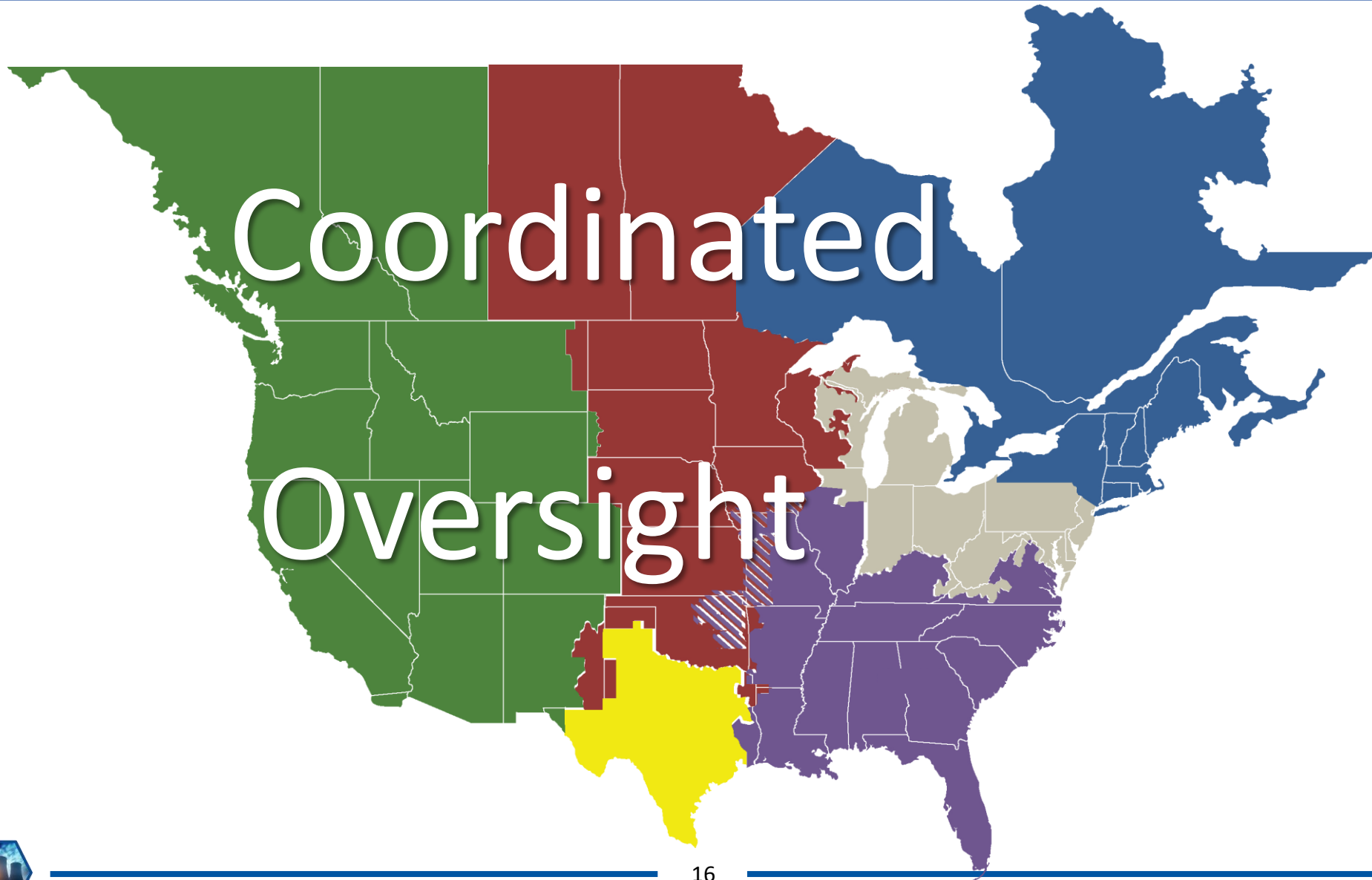
# Examples



# Standard Protocol

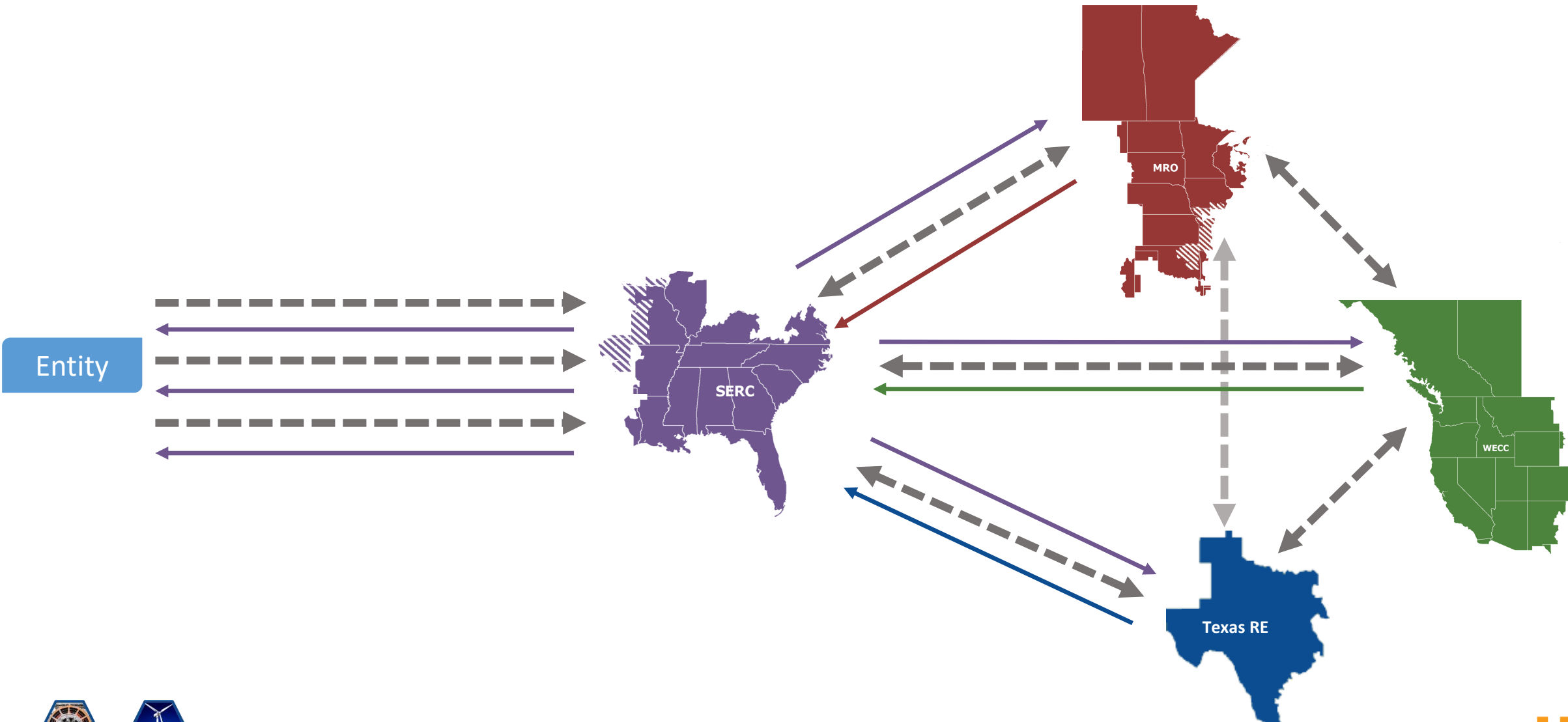


# Another Way





# Same Example: Coordinated Oversight



# Example Outcome for Entity Outside of Coordinated Oversight

**Duplicative administrative obligations**

**Limited opportunity for Regional coordination**

**Deluge of deadlines, timelines, alternative tracking numbers, etc.**

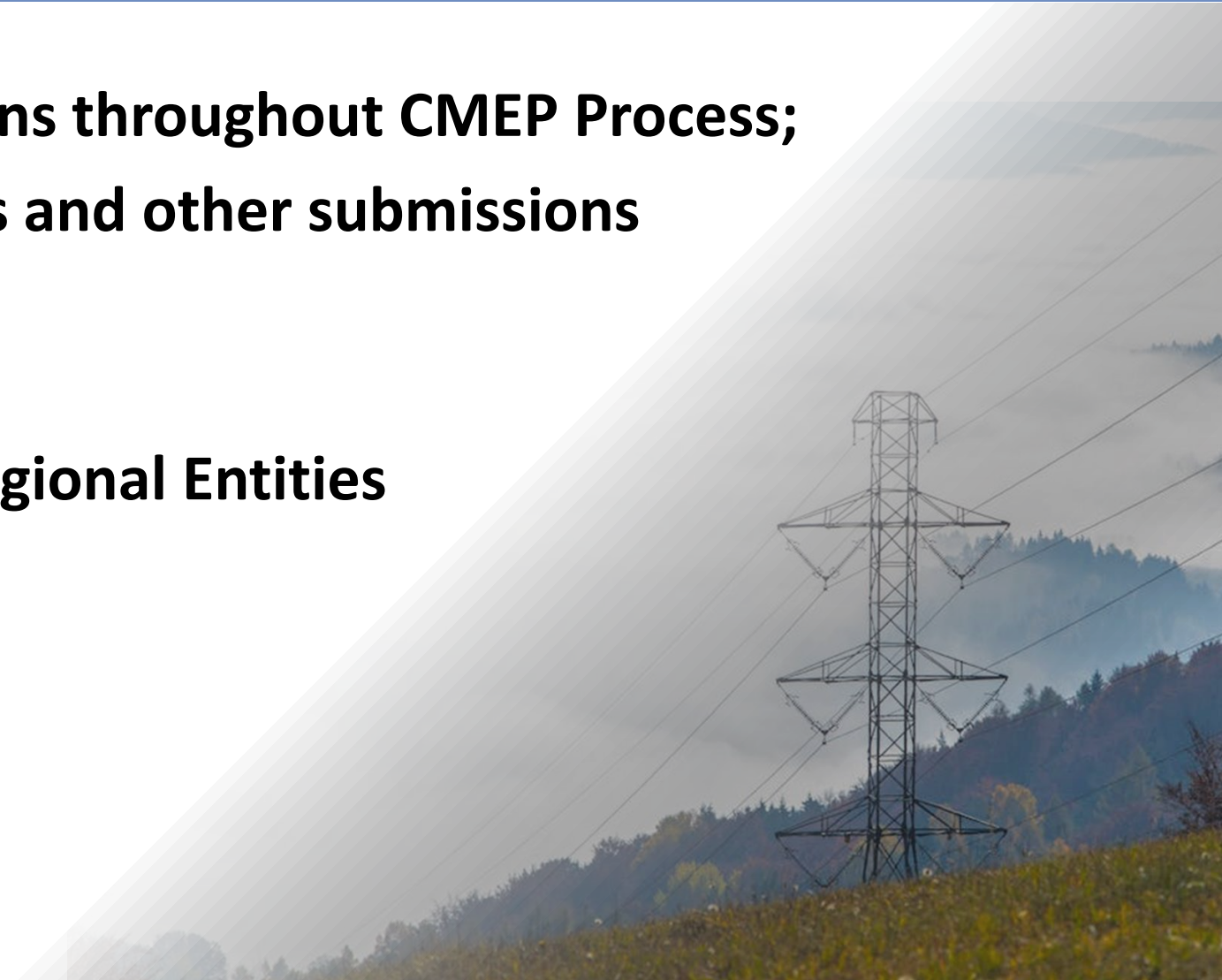


# Example Outcome for Entity in Coordinated Oversight

**Centralized source for communications throughout CMEP Process;  
Centralized destination for responses and other submissions**

**Formalized coordination between Regional Entities**

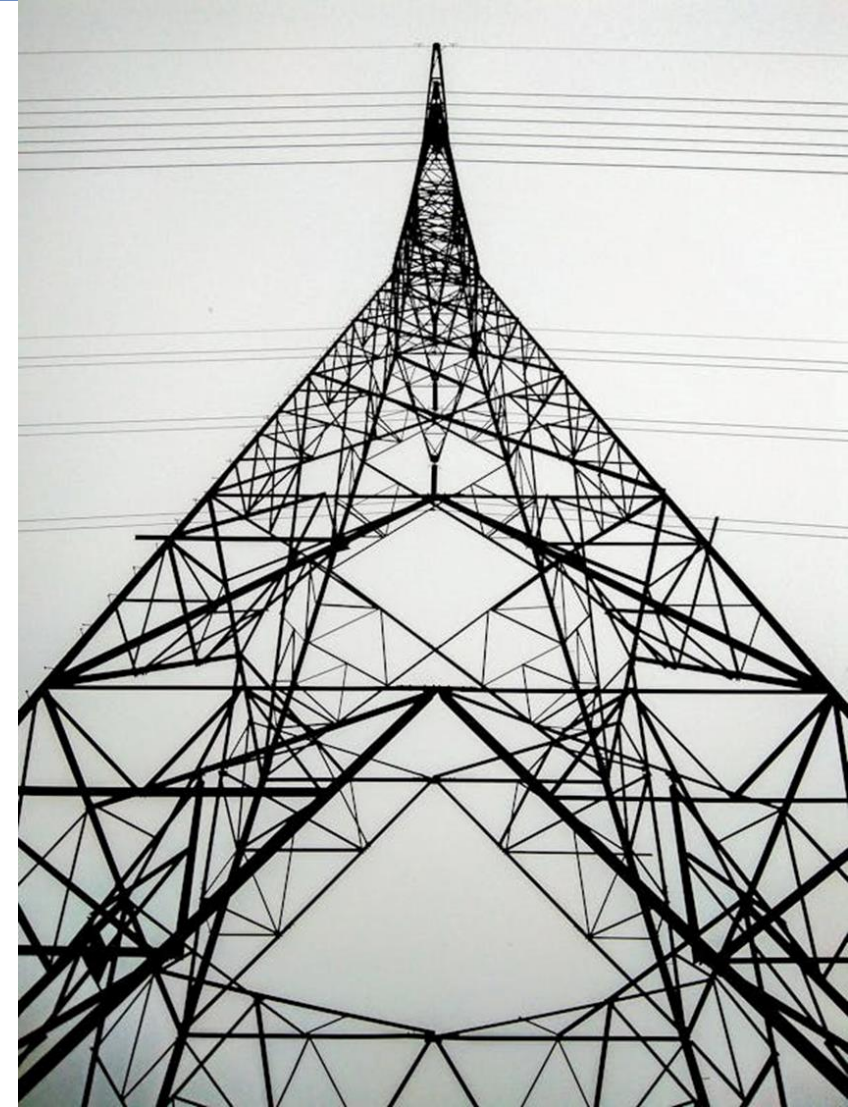
**Synchronized processing timelines**



# Coordinated Oversight

## □ Impact across breadth of CMEP obligations

- Self-Reporting and associated Enforcement Process
- Periodic Data Submittals
- Self-Certifications
- Compliance Engagements
  - Compliance Audits
  - Spot Checks
  - Compliance Investigations



# Common Questions about Coordinated Oversight



## What about Region-specific considerations/expertise?

- While quarterbacked by LRE, expertise of all Regional Entities can still be brought to bare

## Is it final? Is it onerous to switch?

- No, the entity can change its mind and opt out at any point

## Compliance history implications?

- Already consider affiliated entities and organizations that share a common NERC compliance program

## Your questions?



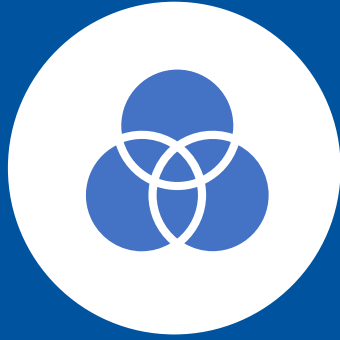
# Common Questions about Coordinated Oversight



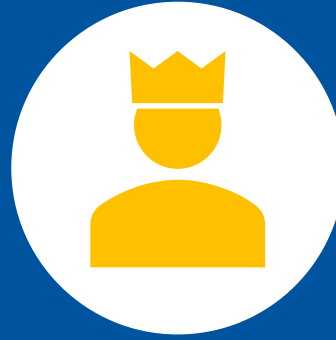
## Coordinated Oversight Registration



# Criteria for Coordinated Oversight



**Operating or owning assets in two or more Regional Entity jurisdictions with one or more NERC IDs.**



**Must designate a single Primary Compliance Contact (PCC)**

- This PCC will coordinate the collection of all required documentation and evidence from **ALL** facilities.



**Verify Primary Compliance Contact (PCC), Primary Compliance Officer (PCO), Authorizing Officer (AO) are accurate prior to submitting a request.**



# Process for Registering

- ❑ **PCC, PCO, or AO will submit to NERC an email request to be included in the Coordinated Oversight Program.**
  - If requested through the Regional Entity, you will be directed to request through NERC.
- ❑ **NERC will then communicate with the MRRE for any additional information.**
- ❑ **NERC compiles info and seeks approval from the ERO Enterprise.**
- ❑ **Upon Approval**
  - Notify MRRE of approval
  - Ensure the MRRE understands its obligations
- ❑ **MRREs should submit their request to [ComplianceOversight@nerc.net](mailto:ComplianceOversight@nerc.net)**

## The request should include the following:

- Registered entity name
- NERC Compliance Registry (NCR) numbers
- Applicable Region (per registered entity)
- Single PCC info for MRRE
- Description of facilities and assets (to assist in application suggestion guides)





# Choosing the Lead Region

## What is considered when choosing a lead Region?

- Location of assets
- Seams issues
- Registered functions in each region
- Load
- Generation & Transmission assets
- Control Center locations
- Protection System Schemes
- Blackstart units

**Please note: MRREs will not be involved with choosing a lead Region**



# Helpful Links

## ☐ Coordinated Oversight Guide

- [https://www.nerc.com/pa/comp/Reliability%20Assurance%20Initiative/ERO\\_Enterprise\\_Coord\\_Oversight\\_Guide.pdf](https://www.nerc.com/pa/comp/Reliability%20Assurance%20Initiative/ERO_Enterprise_Coord_Oversight_Guide.pdf)

## ☐ MRRE Coordinated Oversight Program - FAQs

- <https://www.nerc.com/pa/comp/Reliability%20Assurance%20Initiative/Coordinated%20Oversight%20MRRE%20FAQ.pdf>



The background of the slide features a blurred Texas state flag on the left and a target with several darts on the right. The darts are clustered in the center of the target, suggesting a focus on a specific point.

Questions?



**TEXAS RE**

Ensuring electric reliability for Texans