

2021 Texas RE Regional Risk Elements

Texas RE has developed four Regional Risk Elements for 2021.

Each Regional Risk Element has one or more associated requirements called Areas of Focus. During the 2021 engagement year, the Risk Team will review the Elements for each applicable entity scheduled for an engagement. Each of the associated requirements indicated in the Areas of Focus will be considered for scope, subject to an analysis of the specific risks the entity poses to the BPS.

Note that the establishment of an Area of Focus does not automatically mean that the requirement will be included in an engagement scope. Instead, it means that the requirement will be strongly considered for scope, with professional judgment applied to the facts and circumstances of the entity and the engagement.

1. Supply Chain Vulnerability

Although high and medium impact CIP requirements have always represented significant risk, the SolarWinds breach has brought those risks to the forefront to an even greater degree. While there is some overlap with the Remote Connectivity and Supply Chain Risk Element from the 2021 ERO CMEP IP, this Texas RE Risk Element includes a larger number of Areas of Focus. These additional requirements address more issues surrounding External Routable Connectivity, patch management, malicious code prevention, incident response, and vulnerability assessment.

Areas of Focus:

CIP-005-6 R1, R2

CIP-007-6 R1, R2, R3, R4

CIP-008-6 R1, R2, R4

CIP-010-3 R1, R3

CIP-013-1 R1

2. Low Impact Cyber Security Vulnerability

CIP-003-8, made effective in 2020, brought significant responsibilities to registered entities with respect to low impact BES Cyber Systems. Specifically, nearly all entities in the region have new responsibilities with respect to Electronic Access Controls (EAC), Transient Cyber Assets (TCA), and Removable Media (RM).

Area of Focus:

CIP-003-8 R2

3. Failure to Remain Connected during Transients

Texas RE has focused on a regional risk in recent years, namely the failure of some generating units to remain connected during voltage transients. The current Risk Element addresses transmission line loadability and Protection System coordination as well, in addition to broader generation ride-through risks.

Areas of Focus:

PRC-019-2 R1

PRC-023-4 R1

PRC-024-2 R1

PRC-024-2 R2

PRC-026-1 R2

PRC-027-1 R1

4. Inadequate Modeling and Recording

This Risk Element has much in common with Poor Quality Models Impacting Planning and Operations from the 2021 CMEP IP. However, it adds the Transmission Planner's responsibility for verifying the usability of the modeling data provided by the Generator Owner, as well as the need for Generator Owners to verify their units' real and reactive power. Finally, it also includes the risk of failure to have appropriate dynamic Disturbance recording capability.

Areas of Focus:

MOD-025-2 R1

MOD-025-2 R2

MOD-026-1 R2

MOD-026-1 R6

MOD-027-1 R2

MOD-027-1 R5

PRC-002-2 R6, R7