## Texas REview

May 2020



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this Newsletter!

### From the Desk of the CEO

The "new normal" in this COVID-19 pandemic is beginning to feel a bit routine for all of us. At Texas RE, we've been working from home for more than six weeks and as I discussed in the April newsletter, have adapted our standard operating procedures to accommodate social distancing and protect the health of our employees and stakeholders. We're simultaneously becoming experts at video conferencing and experiencing fatigue at being on video calls for several hours a day.

The best news is the bulk power system (BPS) continues to operate reliably. For this, I'd like to offer my sincere gratitude for all of the hard work by energy industry personnel in Texas and around the country. Stakeholders have implemented thoughtful business continuity plans that require everything from control room social distancing to disinfecting workstations after every shift. Some operations are even having certain critical personnel live on-site. It is incumbent on all of us to recognize the sacrifices these dedicated professionals are making to ensure the power keeps flowing. NERC recently published a special Pandemic **Preparedness and Operational** Assessment: Spring 2020 that reviewed reliability considerations and operational preparedness during this crisis. The report shows our industry's efforts are paying dividends, as NERC has not identified any specific threat or degradation to the reliable operation of the BPS.

As the state economy begins to reopen, we are taking a cautious approach to reopening our office in Austin because the health of our employees, board members, and



stakeholders must take precedence. I recently extended our work-fromhome status through the end of May, with the current plan to begin a limited re-opening June 1. This means that our May 27 Member Representatives Committee (MRC), Audit, Governance, and Finance Committee (AG&F), and Board of Directors meetings will be held via video conferencing. We are currently working to amend the format to accommodate fully remote meetings.

We have also made the decision not to host events in our Conference Center this summer. It is unfortunate as this will impact numerous opportunities to interact with our members and other friends in the industry, but it is the right decision for the health and safety of all involved. Our usual summer workshop, Reliability 101, will be reorganized as a series of short webinars rather than as a one-day event. More details will be forthcoming on the dates, times, and topics.

From a compliance perspective, we continue to follow NERC and FERC guidelines and will not be conducting any on-site audit activities through the

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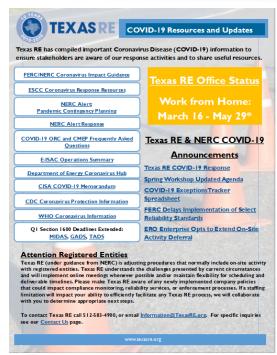
### From the Desk of the CEO, cont.

recently extended date of September 7. We have shifted our compliance interactions online. All Section 1600 reporting deadlines for the first quarter of 2020 have been extended to June 29. FERC also granted NERC's request to delay the implementation of several Reliability Standards (see page 5 for details). Please continue to check our COVID-19 resources document as it is updated regularly.

We are all looking forward to the time when we can return to working in the office, meeting face-to-face, and enjoying large gatherings. Until then, please continue to be diligent in your work and in your efforts to keep yourselves and your families safe.

Regards, Lane Lanford





Texas RE provided an update regarding the Centralized Organization Registration ERO System (CORES) during our Talk with Texas RE session on April 23, 2020. A copy of the presentation and recording can be reviewed here.

As of March 2020, CORES has been released to all registered entities in the Texas RE region. Registered entities must review and validate registration information in CORES for accuracy and completeness by **June 1, 2020**.

### **Texas RE Board of Directors**

Fred N. Day, IV Chair

(Independent)

Milton B. Lee Vice Chair (Independent)

Dr. Delores Etter (Independent)

Crystal E. Ashby (Independent)

W. Lane Lanford President and CEO Liz Jones MRC Chair (Affiliated)

Curt D. Brockmann MRC Vice Chair (Affiliated)

DeAnn T. Walker Chairman, Public Utility Commission (Ex officio, non-voting)

Lori Cobos Public Counsel, Office of Public Utility

Counsel

(Ex officio, non-voting)

There are several steps that must be taken during this process and they are outlined in the Texas RE <u>CORES</u> <u>Validation Instruction Guide</u>. Please use this guide when you begin the validation and review process. Texas RE also has two additional resource documents to assist with the validation process. The <u>CORES Validation</u> <u>Worksheet</u> can be utilized by each registered entity to document their findings, and the <u>CORES Introductory Training</u> document provides an overview of CORES functionality.

Access rights to CORES have been granted to all appropriate contacts (i.e., PCC, ACC, and PCO). Be sure to review each role and validate that the contacts have been granted the appropriate permissions. Remember, you must have an active <a href="ERO Portal">ERO Portal</a> account before you can access your data in CORES.

If you have any questions about CORES, please contact Abby Fellinger at 512-583-4927 or email <u>Texas RE</u> <u>Registration</u>.

### **Upcoming Texas RE Events**

MRC, AG&F, and Board Meetings - May 27, 2020

Join us on May 27, 2020, for our quarterly meeting of the Member Representatives Committee (MRC), the Audit, Governance & Finance Committee (AG&F), and the Board of Directors.

Due to concerns surrounding COVID-19, these meetings will be held via video conference.

The agenda and materials for each meeting will be posted in advance of the meeting date in accordance with Texas RE's Board policies:

MRC Meeting | AG&F Meeting | Board Meeting

### <u>Upcoming Talk with Texas RE Schedule</u>

- April 23 CORES & the ERO Portal
- May 7 Align, Are We There Yet?
- May 14 The MIDAS Touch
- May 21 PRC-027
- June 18 Assessment of Reliability Performance

Please contact information@texasre.org with any questions.

# Pandemic Preparedness and Operational Assessment: Spring 2020

NERC has released the <u>Pandemic Preparedness and Operational Assessment: Spring 2020</u>, which reviews reliability considerations and operational preparedness during the COVID-19 outbreak. Currently, NERC has not identified any specific threat or degradation to the reliable operation of the bulk power system. However,

as pandemic mitigation and containment strategies continue, prolonged periods of operator sequestration and deferred equipment maintenance increase risk profiles. This could exacerbate impacts to the bulk power system during the summer months and potentially over the long-term.

#### Spring 2020

- No specific reliability issue identified
- Potential workforce disruptions
- Supply chain interruption
- Increased cyber security threat and monitoring
- Different system conditions including lower demands and higher voltages.
- System operators under sequester
- Noncritical staff are remote

### **NERC Lesson Learned**

Misoperation of 87N Transformer Ground
Differential Relays Causing Loss of Load

Gaps in implementing modification and commissioning processes led to the omission of neutral connections for three separate transformer neutral differential relays, ultimately causing three simultaneous misoperations and a subsequent loss of load.

#### **Protracted Fault in a Transmission Substation**

Electronic communications equipment utilized to transmit and receive information from the remote terminals of a transmission line automatically shut down within milliseconds when a bus fault occurred at one terminal of the line. Neither the primary nor the back-up relay protection cleared the fault, which continued for over four minutes.

## Loss of Automatic Generation Control During Routine Update

During a weekly automatic generation control (AGC) software update, a critical AGC task aborted at one of two fully redundant control centers and the same critical task aborted at the other control center four minutes later. As a result, generation schedules could not be set and area control error (ACE) could not be automatically calculated until the issue was resolved. The cause was a modified line of code.

For a detailed analysis of the issues leading to and caused by these events, please visit the <u>NERC</u> <u>Lessons Learned Page</u>.

# AHGN

On April 16, 2020, NERC hosted the ERO Enterprise Compliance Monitoring and Enforcement Program (CMEP) staff workshop via webinar. During the workshop, NERC demonstrated the functionality of Align and provided updates on the ERO Evidence Locker. NERC staff navigated through Align and displayed some of the following "how to" scenarios:

- View and navigate the dashboard
- Use of the sort and filter features, including icons that provide registered entity information and guidance to complete a request
- View the NERC Standard and Requirement language
- Enter findings for the registered entity and Region
- Process and view the status of preliminary screens, enforcement actions, mitigation plans, and milestones
- View, link, and consolidate open enforcement actions (OEAs)
- Use of the search feature

As the development of Align and the ERO Evidence Locker progress, NERC and the Regional SMEs are validating registered entity functional registrations and NERC Standards and Requirements. NERC continues to focus on the Evidence Locker harmonization process, development and design of Release 2 (Periodic Data Submittals (PDS), Technical Feasibility Exceptions (TFEs), Self-Certifications, and development of training materials.

Check the <u>Align FAQs</u> for regular updates. For additional Align information, please visit NERC's <u>Align page</u>. If you have any questions or concerns, please contact <u>AskAlign@nerc.net</u> or Texas RE's Align Project Change Agent Rochelle Brown at 512-583-4921 or email <u>Rochelle.Brown@texasre.org</u>.



# **ERO Enterprise Opts to Extend On-Site Activity Deferral**

As first announced on March 18, the ERO Enterprise has postponed on-site audits and other on-site activities during the COVID-19 health crisis. The ERO Enterprise has extended this date through September 7, 2020, to allow registered entities to continue to focus their resources on keeping their workforces safe and the lights on.

The ERO Enterprise recognizes that there are significant uncertainties regarding the duration of the outbreak and the subsequent recovery, and will continue to evaluate the circumstances to determine when on-site activities may resume safely or whether additional regulatory relief is necessary. In the interim, the Regional Entities are actively involved in remote oversight activities and are experimenting with innovative approaches to work with registered entities during this pandemic to continue assuring the reliability and security of the bulk power system.

# Pandemic Cause Code and Examples for GADS Reporters

The NERC GADS Working Group has developed a guide to answer questions about how events impacted by the COVID-19 pandemic should be handled. There is an expectation that NERC and other regulators may ask how the pandemic affects reliability. In order to track how the pandemic affects reliability, the NERC GADS Working Group has taken several steps, which have been detailed in NERC's <a href="Pandemic Cause Code and Examples for GADS Reporters">Pandemic Cause Code and Examples for GADS Reporters</a> guide.

This document along with an updated list of Cause Codes has been posted to the NERC website at the <u>GADS Data</u> <u>Reporting Instructions page</u>, as well as a reference in the NEWS on the NERC OATI portal (webE-GADS).

The April 29, 2020 Risks and Mitigations for Losing EMS Functions Reference Document – Version 2.0 webinar is available <a href="here">here</a>!

# FERC Grants NERC Request to Delay Implementation of Select Reliability Standards

On April 6, 2020, NERC submitted a motion requesting that FERC defer upcoming implementation deadlines for select Reliability Standards in order to allow registered entities to focus their resources on coronavirus-related priorities. On April 17, 2020, FERC issued an order granting that motion. The delayed Reliability Standards and their new implementation dates are:

- CIP-005-6 Cyber Security Electronic Security Perimeter(s): October 1, 2020
- CIP-010-3 Cyber Security Configuration Change Management and Vulnerability Assessments: October 1, 2020
- CIP-013-1 Cyber Security Supply Chain Risk Management: October 1, 2020
- PRC-002-2 Disturbance Monitoring and Reporting Requirements (phased-in implementation for Requirements R2-R4 and R6-R11), phased-in 50% compliance requirement: **January 1, 2021**
- PRC-025-2 Generator Relay Loadability, phased-in implementation of Attachment 1: Relay Settings, Table 1
  Options 5b, 14b, 15b, and 16b: January 1, 2021
- PRC-027-1 Coordination of Protection Systems for Performance During Faults: April 1, 2021
- PER-006-1 Specific Training for Personnel: April 1, 2021

Contact information@texasre.org if you have any questions.

### **Standards Update**

#### Comment and Ballot Periods

Project Name	Open through 8:00 p.m. ET on date listed
Project 2020-03—Supply Chain Low Impact Revisions	May 6, 2020
Project 2020-04—Modifications to CIP-012	May 11, 2020
Project 2020-02— <u>Transmission-connected Resources</u>	May 13, 2020
Project 2019-06—Cold Weather	May 21, 2020
SER Phase 2—Operational Data Exchange Simplification SAR	May 27, 2020

### **NERC Actions**

On April 6, 2020, NERC filed NOPR <u>comments</u> regarding NERC Standards Efficiency Review retirements.

 These comments are in response to the Notice of Proposed Rulemaking FERC issued on January 23, 2020.

On April 23, 2020, NERC filed a Petition for approval of erratum to TPL-001-5.

- This is an erratum to NERC's petition submitted on December 7, 2018 seeking approval for TPL-001-5.
- NERC identified an error in Requirement R2, Part 2.7: a cross-reference had not been updated when the requirement was revised.

#### **FERC Actions**

On April 2, 2020, FERC issued a <u>letter order</u> granting an extension of time for NERC to submit compliance filings pertaining to NERC's Five-Year Performance Assessment.



### Upcoming Enforceable Standards (as of May 5, 2020)

Enforcement Date	Non-CIP Standard/Requirement
50% by 7/1/2020	MOD-026-1 R2
50% by 7/1/2020	MOD-027-1 R2
10/1/2020	TPL-007-4 R1, R2, R5, R9
1/1/2021	PRC-012-2
Updated 50% by 1/1/2021	PRC-002-2 R2-R4, R6-R11
Updated 1/1/2021	PRC-025-2 Attachment 1, Options 5b, 14b, 15b,and 16b
Updated 4/1/2021	PER-006-1
Updated 4/1/2021	PRC-027-1
7/1/2021	TPL-007-4 R12, R13
1/1/2022	TPL-007-4 R6, R10
100% by 7/1/2022	PRC-002-2 R2-R4, R6-R11
7/1/2022	PRC-002-2 R2-R4, R6-R11: Entities owning only one BES bus, BES Element, or generating unit shall be fully compliant within 6 years
1/1/2023	TPL-007-4 R3, R4, R8
7/1/2023	TPL-001-5 R1, R2, R4
1/1/2024	TPL-007-4 R7, R11
100% by 7/1/2024	MOD-026-1 R2
100% by 7/1/2024	MOD-027-1 R2

Enforcement Date	CIP Standard/Requirement	
4/1/2020	CIP-003-8 R1 – R4	
Updated 10/1/2020	CIP-005-6 R1 – R2	
Updated 10/1/2020	CIP-010-3 R1 – R4	
Updated 10/1/2020	CIP-013-1 R1 – R3	
1/1/2021	CIP-008-6 R1 – R4	
7/1/2022	CIP-012-1 All	

PRC-005 – See the <u>Implementation Plan</u>

- Implementation Plan <u>Calendar View</u>
- Implementation Plan Requirements View

PRC-025 – See the Implementation Plan

Want to participate in a ballot for a Regional Standard?

Entities must be in the Registered Ballot Body (RBB) before joining a registered ballot pool.

To join, please fill out the <u>RBB Application</u> form and email it <u>here</u>.

### **Contact Information for Texas RE Management**

Follow Us





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### **Texas Reliability Entity, Inc.**

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Phone: (512) 583-4900

E-mail: information@texasre.org



To assure effective and efficient reduction of risks to the reliability and security of the bulk power system within the ERCOT Interconnection.

Texas Reliability Entity, Inc. monitors and enforces compliance with Reliability Standards for the North American Electric Reliability Corporation; develops regional standards; and monitors and reports on compliance with the ERCOT Protocols.



### **Upcoming Important Dates at Texas RE**

May 7 - Talk with Texas RE: Align, Are we th	iere yet? – 1:	30 p.m.
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May 14 - Talk with Texas RE: The MIDAS Touch - 1:30 p.m.

May 21 - Talk with Texas RE: PRC-027 - 1:30 p.m.

May 27 - MRC Meeting

May 27 - Audit, Governance & Finance Committee Meeting

May 27 - Board of Directors Meeting

May 28 - NSRF Meeting - 9:30 a.m. (Webinar)

June 18 – Talk with Texas RE: Assessment of Reliability Performance – 1:30 p.m.

June 25 - NSRF Meeting - 9:30 a.m. (Webinar)

May 2020						
Sun	Mon	Tue	Wed	Thu	Fri	Sat
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24	25	26	27	28	29	30
31						

June 2020						
Sun	Mon	Tue	Wed	Thu	Fri	Sat
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