

Annual Reliability and Compliance Workshop: Embracing the Transformation

Day 1 Tuesday, September 27, 2022 1 – 5 p.m. Eastern





Welcome and Logistics

- Safety and Logistics
- This WebEx event is not being recorded
- Please submit all questions through Slido
- We will provide the workshop survey live at the end of Day #2
- Today's presentations (minus the E-ISAC presentation) are posted on the RF website

Join the conversation at Slido.com #RFWorkhshop





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For our virtual participants, what city and state are you joining from?

For our in-person guests, what city and state did you travel from?

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Today's Agenda

Tuesday, Sept. 27					
Presentation	Presenter(s)	Time			
Lur	12 – 1 p.m.				
Opening Remarks	Brian Thiry, Director of Entity Engagement, RF	1 – 1:10 p.m.			
Day 1 Keynote	Tim Gallagher, CEO, RF	1:10 – 1:40 p.m.			
Energy Availability and the Changing Generation Resource Mix	Mark Lauby, Senior VP NERC; and Jim Uhrin, Director, Engineering & Reliability Services, RF	1:40 – 2:40 p.m.			
Bre	2:40 – 3 p.m.				
OT Cyber Threats and Recommendations for the Electric Sector	Robert Lee, CEO and Co-Founder Dragos, Inc.	3 – 3:40 p.m.			
Electricity Threat Landscape and CIP-008 Submission Considerations	Matt Duncan, Director of Intelligence, E-ISAC	3:40 – 4:20 p.m.			
CMEP Updates	Zack Brinkman, CIP Compliance Monitoring Manager, RF	4:20 – 4:50 p.m.			
Closing Remarks	Brian Thiry, Director of Entity Engagement, RF	4:50 – 5 p.m.			
Rece	5 – 7 p.m.				



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Trivia Giveaways

RF is offering the opportunity to win a \$50 Amazon gift card at the end of each workshop day for five participants!

To Enter: Use Slido (Slido.com, Slido app or the QR code). At the closing of each workshop day, we will announce that a content-based trivia question is coming. You will have one minute to enter your name into Slido before the questions are asked. You must enter your first and last name; anonymous responders are not eligible to win.

To Win: A skill-based question will be visible in Slido. You must answer correctly and be the fastest respondent, as recorded in Slido, to win. We will announce the winners who will then email Jody Tortora to receive the \$50 Amazon gift card.

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NO COST TO ENTER. Governed by the rules of Ohio. Registrants and Entrants hold RF harmless from any associated claim and RF is not responsible nor may be held liable for any technical errors or events that may prevent the promotion from running smoothly. Must be over the age of 18 with a valid US address and not an Employee of ReliabilityFirst to win. Any resulting taxes are the responsibility of the winner.



RF Anti-Trust Statement

It is ReliabilityFirst's policy and practice to obey the antitrust laws and to avoid all conduct that unreasonably restrains competition. This policy requires the avoidance of any conduct which violates, or which might appear to violate, the antitrust laws. Among other things, the antitrust laws forbid any agreement between or among competitors regarding prices, availability of service, product design, terms of sale, division of markets, allocation of customers or any other activity that unreasonably restrains competition.

It is the responsibility of every ReliabilityFirst participant and employee who may in any way affect ReliabilityFirst's compliance with the antitrust laws to carry out this policy.



Keynote Speaker

Tim Gallagher President & CEO, ReliabilityFirst



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Energy Availability

Mark Lauby and Jim Uhrin ReliabilityFirst 2022 Fall Workshop September 27, 2022

Strong Regions + Strong NERC = Brilliant ERO









Mark Lauby

NERC Senior Vice President and Chief Engineer

Mr. Lauby joined NERC in January 2007 and has held a number of positions, including vice president and director of Standards and vice president and director of Reliability Assessments and Performance Analysis.

In 2012, Mr. Lauby was elected to the North American Energy Standards Board and was appointed to the Department of Energy's Electric Advisory Committee by the Secretary of Energy from 2013-2017. He has been recognized for his achievements, including the 1992 IEEE Walter Fee Young Engineer of the Year Award. He was named a Fellow by IEEE in November 2011 for "leadership in the development and application of techniques for bulk power system reliability," and in 2014, Mr. Lauby was awarded the IEEE Power and Energy Society's Roy Billinton Power System Reliability Award. In 2020, the National Academy of Engineering (NAE) elected Mr. Lauby as a member.

Prior to joining NERC, Mr. Lauby worked for the Electric Power Research Institute (EPRI) for 20 years.

Mr. Lauby began his electric industry career in 1979 at the Mid-Continent Area Power Pool in Minneapolis, Minnesota. Mr. Lauby is the author of more than 100 technical papers. He earned his bachelor's and master's degrees in Electrical Engineering from the University of Minnesota. In addition, Mr. Lauby attended the London Business School Accelerated Development Program, as well as the Executive Leadership Program at Harvard Business School.



Jim Uhrin

Director, Engineering and Reliability Services

Mr. Uhrin joined ReliabilityFirst in 2007 and has about forty years of working experience in the electric utility industry. In his current role Mr. Uhrin is responsible for overseeing the Engineering and System Performance and the Operational Analysis and Awareness groups. Prior to serving in this role, Mr. Uhrin, held the position of Director, Compliance Monitoring, at ReliabilityFirst Corporation for 8 years. In that role, Mr. Uhrin was responsible for directing and served in an oversight role over all Compliance Monitoring functions performed at RF (Ops/Planning and CIP). In Mr. Uhrin's previous role at ReliabilityFirst, he served as the Manager of Compliance Service and Investigations, where he was responsible for the oversight of the Compliance Monitoring and Enforcement Program (CMEP), Regulatory Reviews, and implementation of most of the CMEP related activities.

Prior to joining ReliabilityFirst, Mr. Uhrin was the Manager of Dispatch and Operation for PJM Interconnection, L.C.C, in their West Office, where he managed both the day-to-day operations of the Bulk Power System and the West Regional office operations. Before joining PJM, Mr. Uhrin held various positions with Allegheny Power as Operations Support Manager, Team Leader in Network Planning and various Engineering positions in Allegheny's Operations and System Planning Groups. Mr. Uhrin is a graduate of University of Pittsburgh with a Bachelor of Science degree in Electrical Engineering and has taken some MBA course work at Duquesne University. He is a Registered Professional Engineer in the state of Pennsylvania and was a NERC Certified System Operator (2010).

- The following drivers have led to rapid changes in energy resources:
 - Governmental policies
 - Changes in resource economics
 - Consumer demand for clean energy
- In addition to the shift in resources, an increase in extreme weather presents new challenges
 - Fuel sources are inherently less secure

Four Pillars of the Energy Transition



No/Low Carbon Energy Resources

Ensure sufficient amounts of no/low carbon energy to achieve decarbonization goals



Transmission

Develop adequate transmission to integrate renewables and transmit/distribute energy

Balancing Resources

Maintain a robust fleet of balancing resources needed to serve energy along with integrated renewables

Energy Supply Chain

Ensure healthy energy supply chains for balancing resources, with sufficient access to stored energy to withstand long-duration, widespread extreme weather events

The Challenge: Sufficient Energy Availability





- Power grid transition is resulting in a higher level of energy uncertainty, regardless of fuel type
 - The current tools, rules of thumb, and approaches used to determine the system's ability to meet demand were not designed for today's grid

•The focus needs not be on fuel type, but rather on energy availability

Considerations in Solving This Challenge

- Rapidly changing generation fleet
- Increasing electrification
- Widespread, long-duration, extreme weather events
- Historically, industry ensured energy through capacity and reserve margins with assurance of fuel



<u>Capacity</u> is the maximum electric output a generator <u>can produce under specific</u> <u>conditions, typically on peak</u>. (MW)

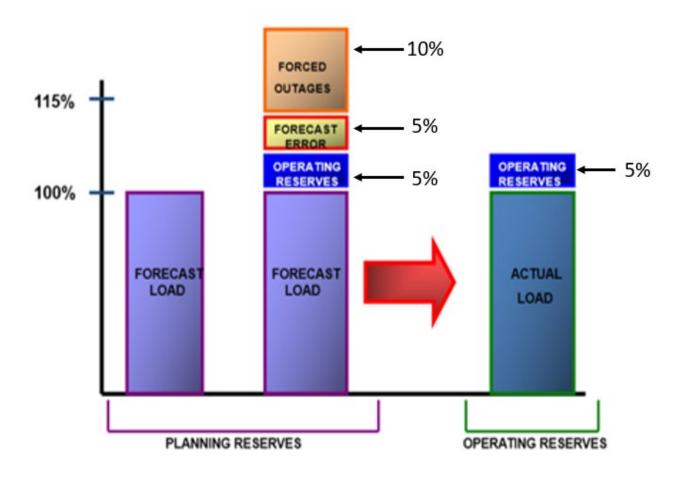
Energy is the amount of electricity a generator produces over a specific period of time. (MWh)

<u>Nameplate</u> is <u>determined by the generator's manufacturer</u> and indicates the maximum output of electricity a generator can produce without exceeding design thermal limits.

https://www.iso-ne.com/about/what-we-do/in-depth/capacity-vs-energy-primer#:~:text=Electricity%20is%20measured%20in%20both,measured%20in%20megawatts%20(MW).

Refresher - Planning Reserve Margin

Illustrative Planning Reserve Margin of 20%



Sufficient resources includes a planning reserve margin to account for weather variations, generation outages and load forecasting error

Year One - The planning year that begins with the upcoming annual Peak Period

Planning Reserve Margin Methodology

- Both PJM and MISO adhere to the ReliabilityFirst BAL-502-RF-03 Standard
 - Establishes the "one day in ten years" loss of load event criterion
 - Only requires performing a study / no required reinforcements
- PJM considers the following:
 - Includes existing and generation with signed agreements
 - Does not include energy-only resources
 - Generation availability rates based on forced, planned and maintenance outages
 - Load forecast uncertainty
 - Likelihood of emergency assistance from adjacent regions
- MISO considers the following:
 - Assumes no internal transmission limitations within the MISO Region
 - Uses an unforced capacity requirement based upon the weighted average forced outage rate for resources

2021-2022 Performance and Trends

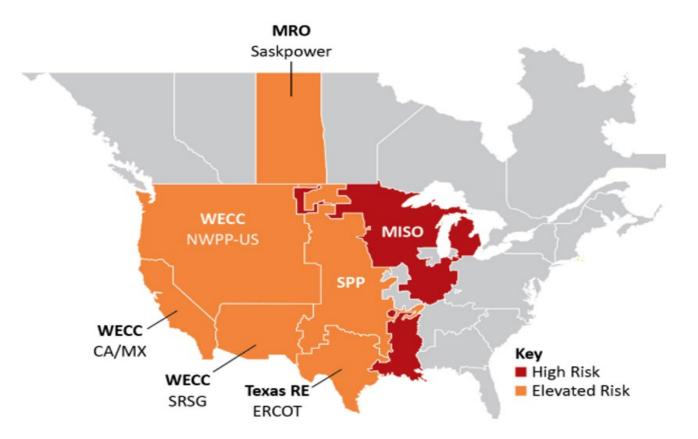
NERC NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION	
2022 State of	of Reliability 🖉
July 2022	
	An Assessment of 2021 Bulk Power System

Bulk Power Syster Performance

Table 3.1: Seasonal Risk Scenario Margins						
	S	ummer 2021		Winter 2021–2022		
Assessment Area	Anticipated Reserve	Typical Outages	Extreme	Anticipated Reserve	Typical Outages	Extreme Conditions
14/60	Wargin 24 cov	4.000/	4.200/	Margin	20 50%	4.200/
MISO	21.60%	4.60%	-4.20%	48.50%	20.50%	-1.20%
MRO-Manitoba					46.40%	4.20%
MRO-SaskPower	19.80%	16.40%	5.70%	19.30%	16.10%	11.60%
NPCC-Maritimes	69.80%	58.80%	27.60%	26.50%	19.90%	-2.10%
NPCC-New England	22.00%	9.50%	-0.70%	71.10%	55.30%	25.90%
NPCC-New York	27.30%	17.00%	18.30%	78.60%	58.40%	33.50%
NPCC-Ontario	20.30%	20.30%	8.50%	20.00%	20.00%	21.30%
NPCC-Québec	40.40%	40.80%	37.90%	12.40%	0.50%	0.80%
PJM	33.50%	25.60%	12.10%	42.00%	29.10%	11.30%
SERC-Central	25.20%	25.20%	10 20%	32 50%	24.40%	9.30%
SERC-East	22.50%	22.50%	12.70%	25.90%	20.60%	4.30%
SERC-Florida Peninsula	23.40%	23.40%	15.40%	35.40%	29.70%	23.20%
SERC-South East	34.10%	34.10%	15.60%	38.70%	31.60%	21.10%
SPP	29.90%	10.80%	-3.90%	56.40%	30.90%	0.80%
Texas RE-ERCOT	15.30%	10.50%	-13.30%	41.90%	26.80%	-37.10%
WECC-AB	34.70%	25.00%	14.50%	34.70%	28.60%	8.30%
WECC-BC	37.50%	37.30%	9,30%	17.90%	17.80%	-0.60%
WECC-CAMX	23.80%	16.70%	-19.30%	40.30%	33.30%	12.30%
WECC-NWPP-US & RMRG	16.90%	15.10%	-10.10%	27.10%	26.60%	-1.50%
WECC-SRSG	20.60%	3.90%	-13.80%	103.30%	93.30%	56.50%

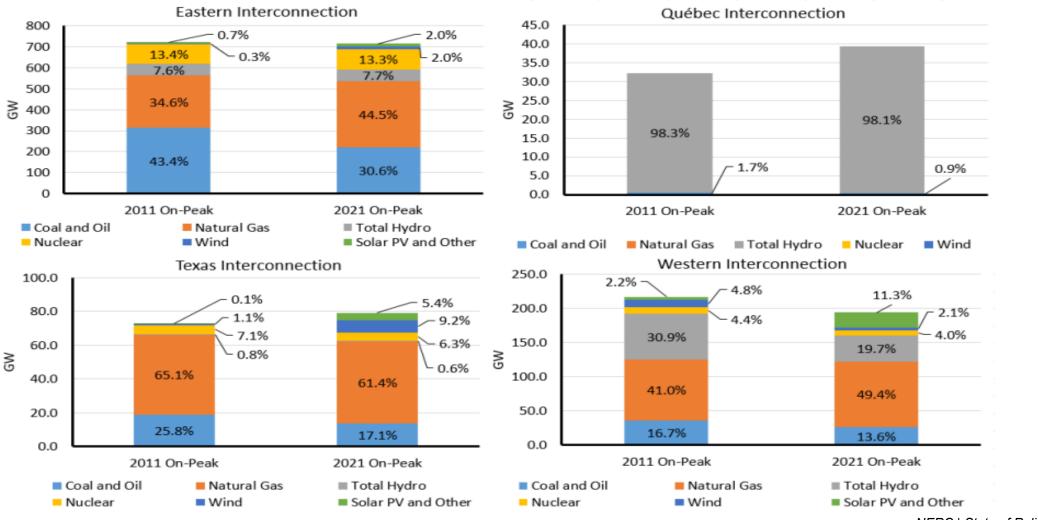
Note: The extreme conditions in Table 3.1 represent higher than average derates of resource capacity and demand.

Summer Planning Reserve Margins



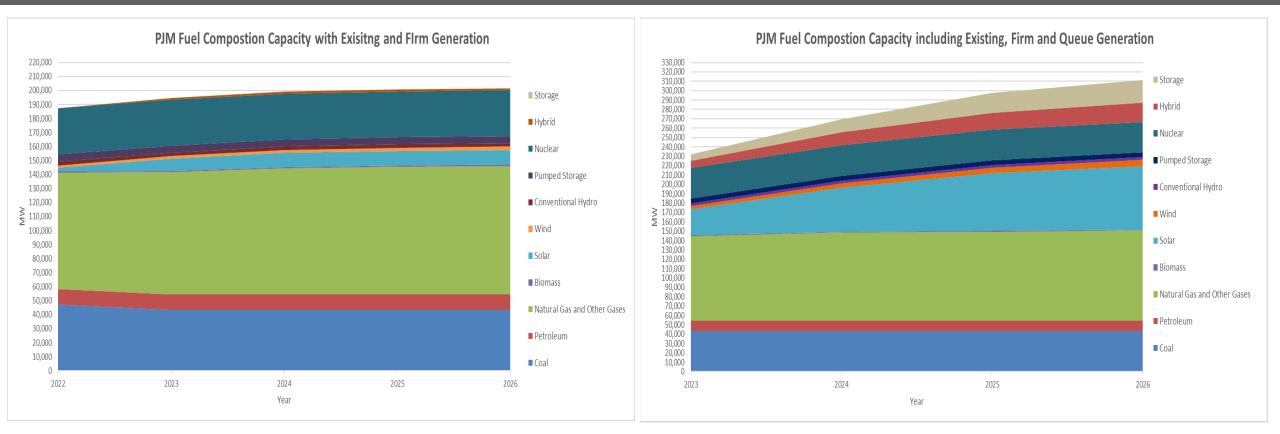
Seasonal Risk Assessment Summary		
High	Potential for insufficient operating reserves in normal peak conditions	
Elevated	Potential for insufficient operating reserves in above-normal conditions	
Low	Sufficient operating reserves expected	

Generation Resource Mix Since 2011



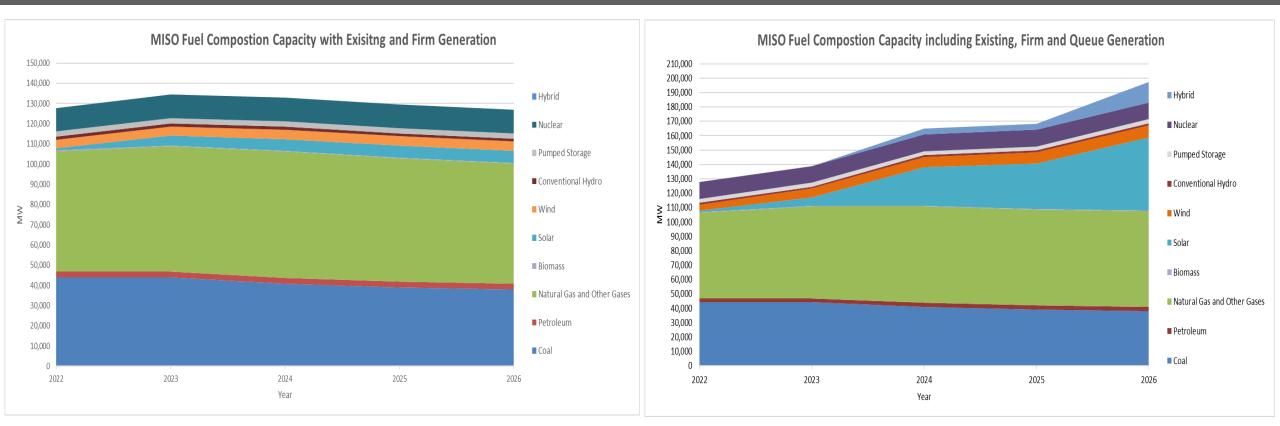
NERC | State of Reliability | 2022

PJM Generation Resource Mix



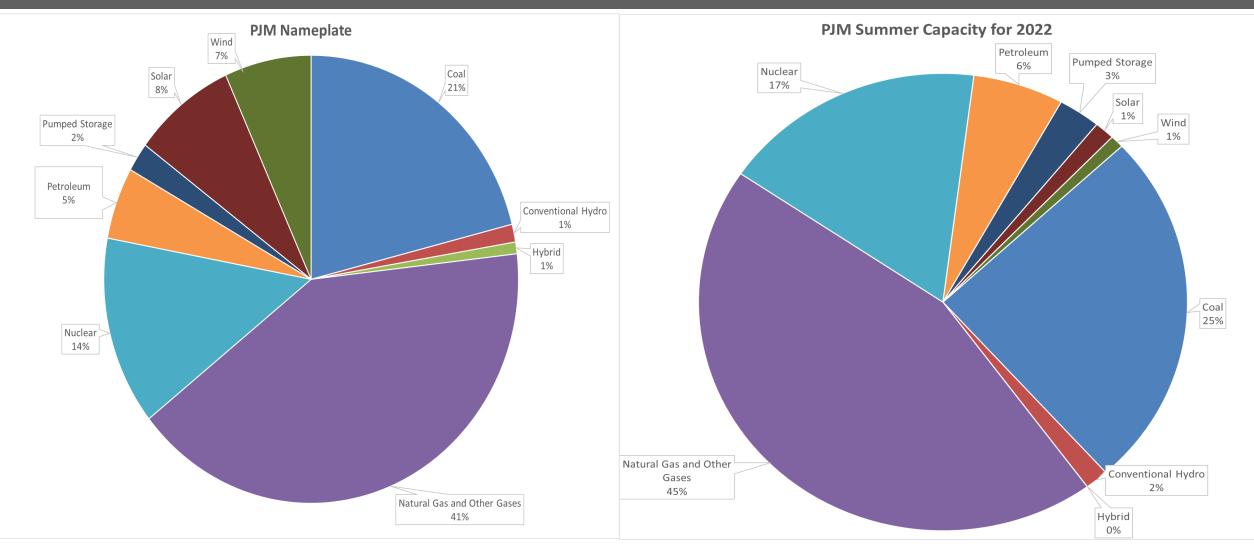
<u>Hybrid Resources</u> includes - Solar and Battery, Wind and Battery, Natural Gas and Battery and Other and Battery <u>Storage</u> includes – Battery Energy Storage

MISO Generation Resource Mix



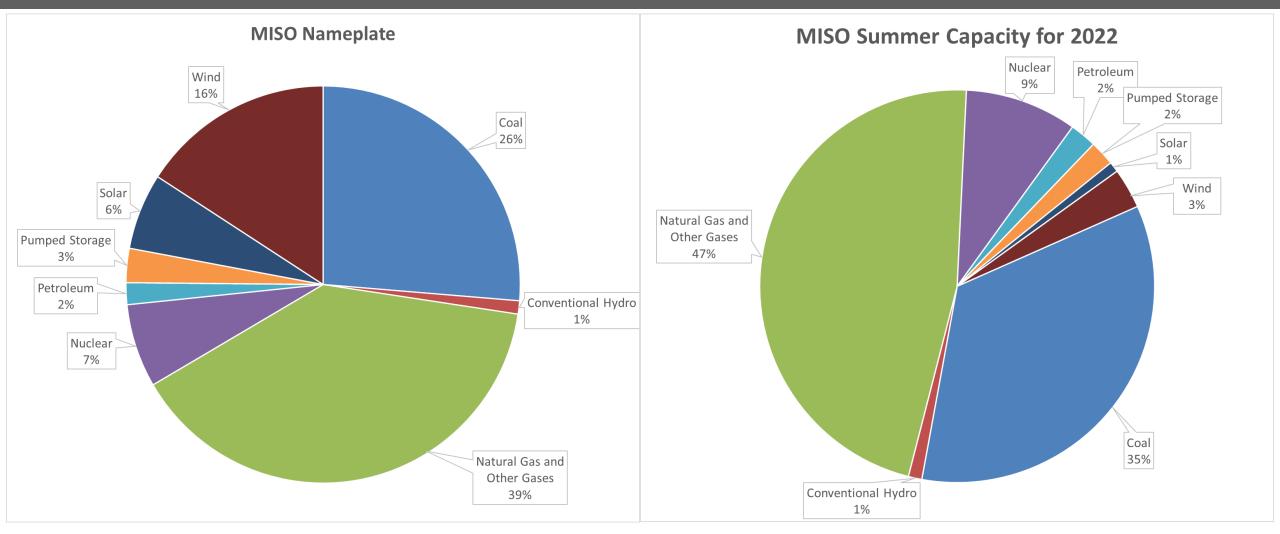
<u>Hybrid Resources</u> includes - Solar and Battery, Wind and Battery, Natural Gas and Battery and Other and Battery

PJM Nameplate vs Capacity



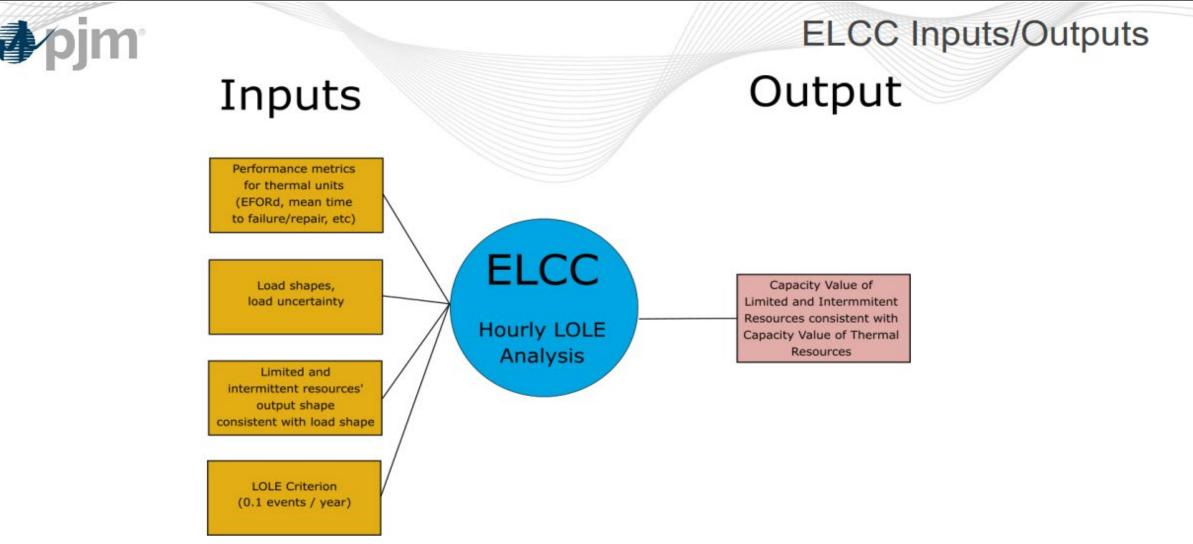
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MISO Nameplate vs Capacity



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PJM Effective Load Carrying Capability (ELCC)



https://www.pjm.com/-/media/committees-groups/task-forces/ccstf/2020/20200407/20200407-item-04-effective-load-carrying-capability.ashx

PJM ELCC

Effective Load Carrying Capability (ELCC)

- Variable resources are only counted partially for PJM resource adequacy studies
- Both wind and solar initially utilize class average capacity expected at the time of peak value
 - 13 percent for wind
 - 38 percent for solar
- Performance over the peak period (typically for three years of operation) is used to determine a unit's individual capacity
- Biomass and hydro are typically counted at full capacity

MISO ELCC

Effective Load Carrying Capability (ELCC)

• MISO utilizes a probabilistic approach with inputs regarding historical output to calculate ELCC for wind resources

- 15.5 percent for wind
- MISO has begun discussion on the possibility of using the ELCC calculation for Solar resources and this is still in the stakeholder review process
 - 50 percent for solar
- All other Non-wind intermittent resources use 15 years of historical summer output

ReliabilityFirst Risks

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List of Risk Categories

Misoperations

Cyber/Physical Security

Human Performance

Environmental Factors

Unknowns & Uncertainty

Event Response/Resilience

Situational Awareness

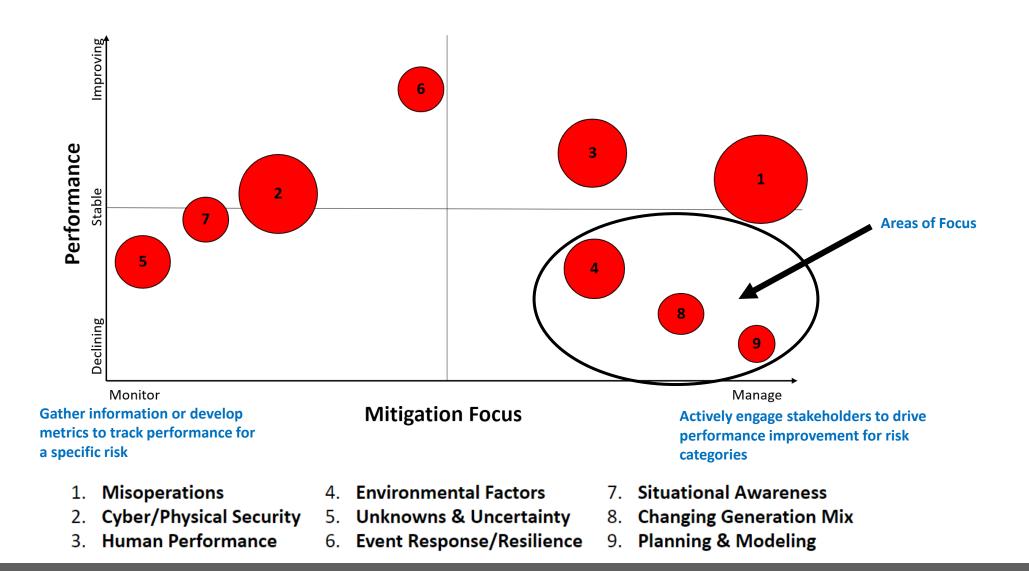
Changing Generation Mix

Planning & Modeling

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Assessing Regional Risk

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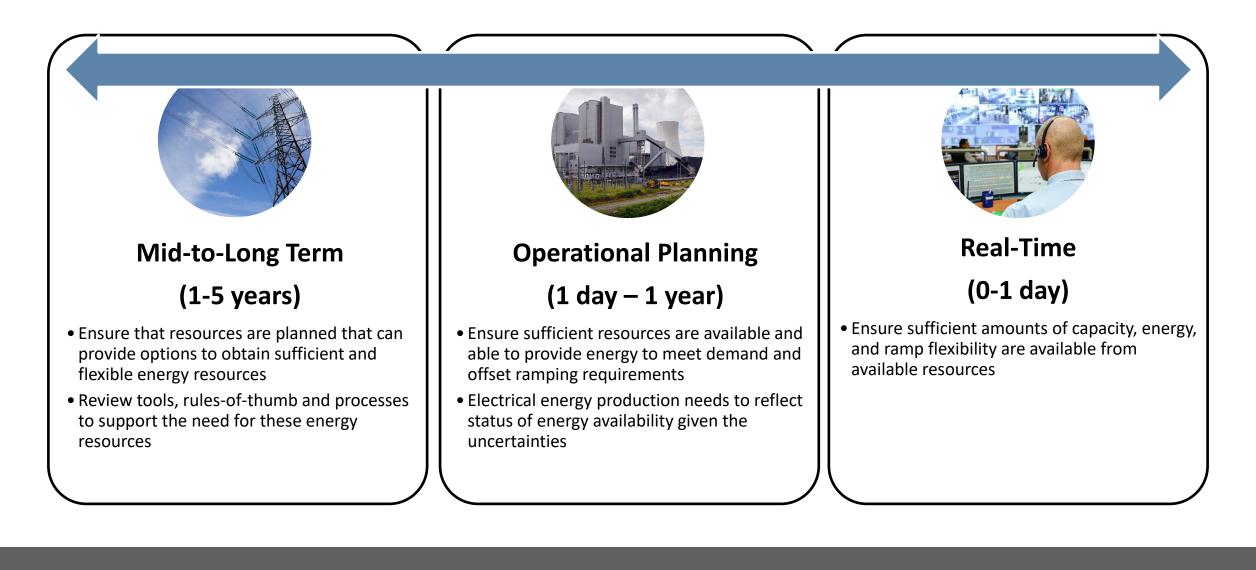


Strong Regions + Strong NERC = Brilliant ERO

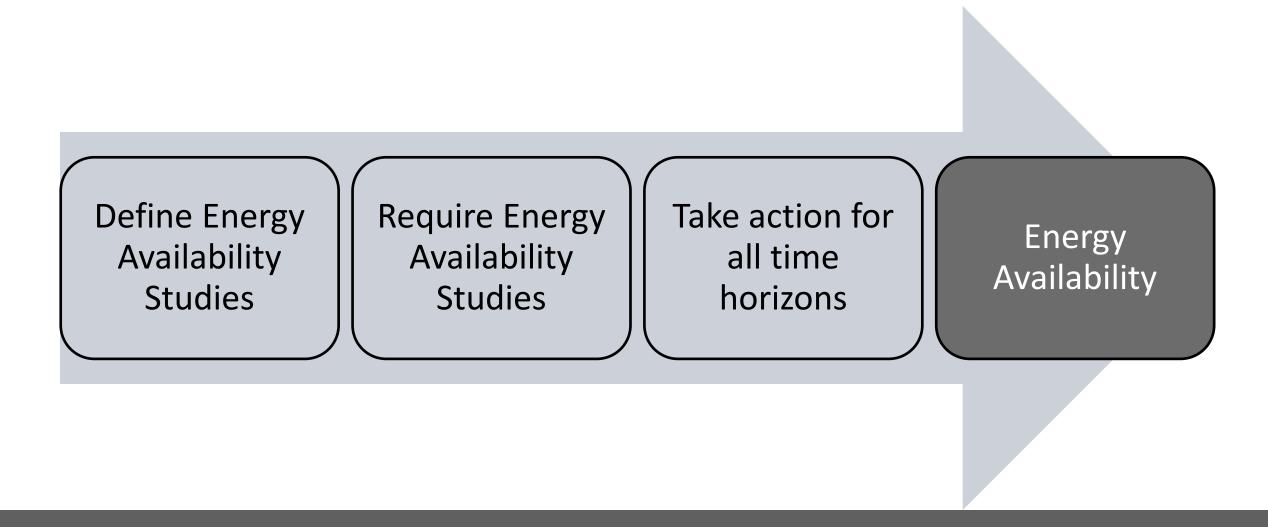
Enhancing the Assessment of Regional Risks

- ReliabilityFirst staff and our Committee and Subcommittees will begin to collaborate on:
 - Identify risks that may have a higher probability of occurrence and/or impact within the ReliabilityFirst footprint
 - Assess the resulting risks in terms of impact and likelihood
 - Build in a feedback loop into our RRA

Energy Availability in 3 Timeframes

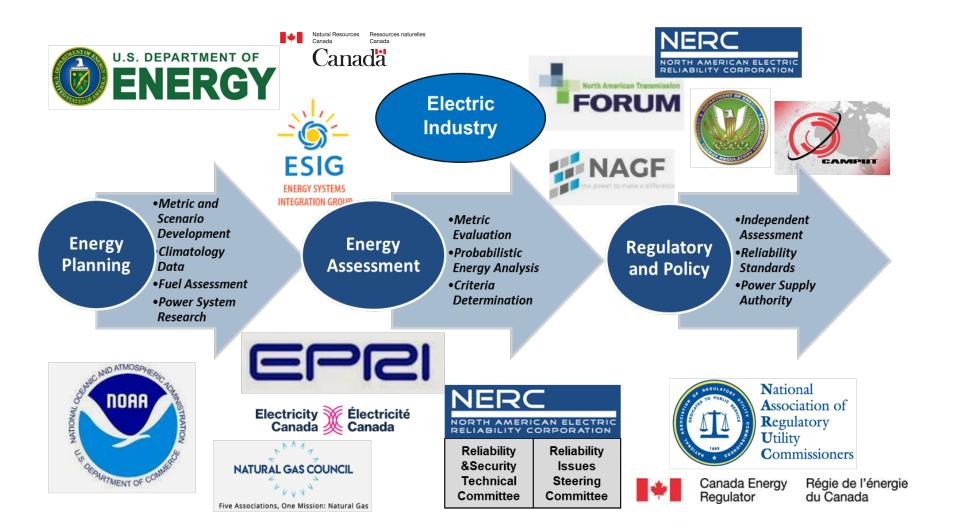


What MUST Be Done?



Partners to Get Us There

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New NERC Industry Group

NERC

Ensuring Energy Adequacy with Energy **Constrained Resources** December 2020 White Paper

Problem Statement

Unassured fuel supplies.¹ including the timing and in n, and volating the terms and local sectors in sufficient amounts of energy on the trical demand and ensure the reliable operation of the bulk power system (BPS) stem to serve elect proughout the year.

Background Destrictly is fundamental to the quality of life for nearly 400 million citizens of North America. Electrification continues apace as new applications are developed for use in advanced technologies; for example, advanced computing now permetate every aspect of our economy, and policy makers are seeking to electrify transportions and herding in order to descholine the economy. The SFS is undergong an unprecedented change that requires rethinking the way in which generating capacity, energy supply, and load serving needs are understood.

Historically, analysis of the resource adequacy of the BPS focused on capacity over peak time period: naonanny aimigas on nie naonats wedgowy on init or stodard on spacisj one pied anni parous kassiment of resource adequary focued on capacity reserve levels compared to pied demand because resources were generally dispatchable and, except for unit outages and de-rates, were available when needed. Reserve margins were planned so that deficiency in capacity to meet daily peak demand [loss of load expectation or loss-of-load probability) occurred no more than one-day-in-ten-years,² Reserve margins are calculated from probabilistic analysis using generating unit forced outage rates based on random equipment failures derived from historic performance. The targeted level has historically been one event equipment Italiuris derived from historic performance. The targeted level has historically been one event in ten years, based on daly peaks (rather than hourly neuropy obligational, Jakimonal linking) that the second the to regarit unavergate. Review and distribution of such second second

Key Assumption

A key assumption in the above analysis has been that fuel is available when capacity is required to provide the requisite energy. This is not surprising as generally fuel availability was assured with either long-term

RELIABILITY | RESULTENCE | SECURITY



Energy Reliability Assessments Task Force (ERATF)



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- What do we do with high impact, low likelihood energy assessments?
- Energy assessments need to be performed throughout the year, not just for peak cases
- Geographical nuances to reliability issues related to energy availability
- Dependency on other critical infrastructure is a key aspect of this risk, and there is a likely need to model fuel infrastructure
- Need to create metrics and criteria for energy assessments
- Assumptions used in studies must be a focus, and various scenarios considered including extreme events
- Assessments need to be considered in the operational timeframe as well, not just longterm planning

- Industry workshop held to discuss feedback and survey results
- Reviewed current NERC Standards against this risk
 - Determined need for new Standards related to both real-time operations and planning

- May 2022 Review industry comments and proposed responses at NERC MRC (Members Representative Committee)
- May 2022 Hold an outreach conference on the proposed responses to industry comments and update the SAR (Standard Authorization Request)
- June 2022 NERC RSTC (Reliability and Security Technical Committee) SAR endorsement
- June or July 2022 NERC Standards Committee SAR acceptance
- July 2022 Solicit industry volunteers for Standard Drafting Teams



Questions and Answers

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Break

See you back at 3:00 for a presentation from Robert Lee from Dragos, Inc.

Join the conversation at **Slido.com #RFWorkhshop**





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Break – Please Return at 3:00 pm Eastern



Guest Speaker

Robert Lee CEO and Co-Founder, Dragos, Inc.



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Electricity Threat Landscape

Matt Duncan Director, Intelligence, E-ISAC



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Electricity Threat Landscape and CIP-008 Submission

Considerations

Matthew Duncan, Director, Intelligence ReliabilityFirst (RF) Reliability and Compliance Workshop September 26, 2022

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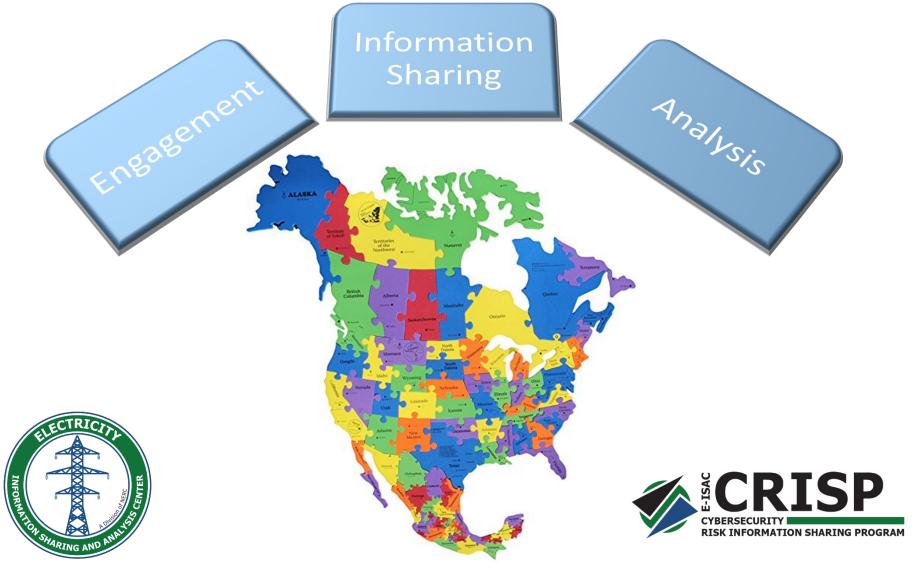


Agenda

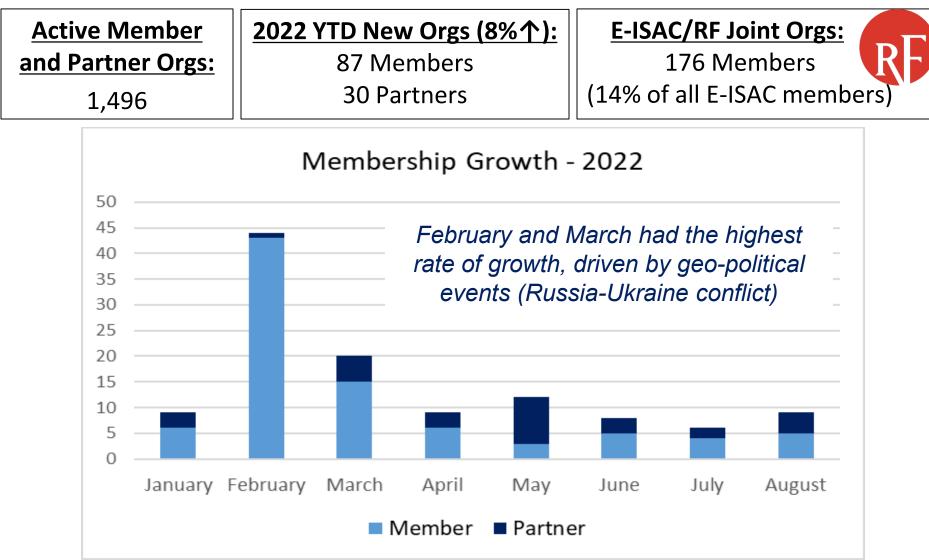
- E-ISAC Overview
- Electricity Threat Landscape
 - Cyber Threats
 - Physical Threats
- CIP-008-6 Submission Considerations
- Collective Defense Actions



E-ISAC OVERVIEW









- Primary member shares with E-ISAC = Phishing
- Exploitation of legacy vulnerabilities (LOG4SHELL)
- Supply Chain / Managed Service Provider (MSP) threats
- Industrial code research by ransomware operators
- Domestic Violent Extremism





China

- Tension over U.S. Congressional visits to Taiwan
- Ongoing Log4j scanning and exploitation
- New groups scanning renewable industry
 - KOSTOVITE (Dragos) overlap with UNC2630 (Mandiant)

Russia

- Industroyer2 malware discovered in Ukraine
- ICS 'Swiss Army Knife' Incontroller (Mandiant) Pipedream (Dragos)
- Ransomware groups support of Russia
- APT29 (SVR) ongoing activities against Microsoft
- APT28 (GRU) Historic Destructive Attacks

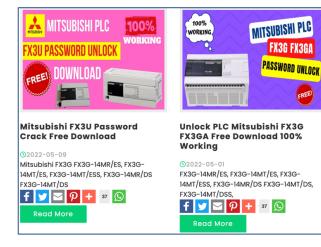


Threat Landscape – Operational Technology



Claroty "Evil PLC" proof of

concept attack Image Source: Claroty T82



Sality malware ICS

'password cracker' -

Image Source: Dragos

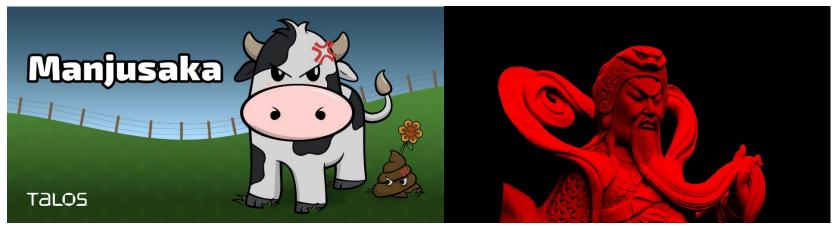


European **Wind Turbine Cyber** Events

Image Source: Bing Creative Commons



- Ransomware operator research of industrial code (FBI)
- Manjusaka Framework observed
- Yanluowang Ransomware and Cisco compromise
- Luxembourg Energy Company attack BlackCat/ALPHV



Source: Cisco Talos

Source: Bleeping Computer



Threat Landscape – Physical

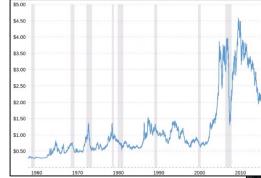
- Theft
 - Copper
 - Catalytic converters
 - Safety
 - Damage

Vandalism

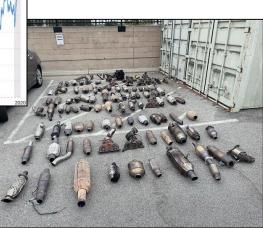
- Safety
- Damage

Ballistic Damage

- Transmission Lines
- Transformers



Courtesy of Macrotrends



Courtesy of Torrance Police Department via USAToday

Courtesy of RTE



Activist Manual



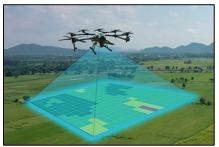
Threat Landscape – Physical

Emerging Threats

- Drones
- **Cyber-Physical**

Activism

- Security response
- New construction





Vendor

Courtesy of DHS



Courtesy of HydroPower.org



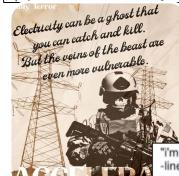
Courtesy of The Irish Times

- Lone Wolf / Small Group Action
 - Targeting key assets

Civil Unrest

- Personnel in zone
- Assets in zone
- Cover for action

you could also easily disable the many unprotected power stations across the country with simple homemade explosives and leave much of the population without electricity





"i'm sabotaging reactor, what an among us moment" -lines to say when placing explosives on your local power grid

Quotes and DVE images obtained from Twitter



CIP-008-6 Requirements

CIP-008-6 Table R4 – Notifications and Reporting for Cyber Security Incidents			
Part	Applicable Systems	Requirements	Measures
4.1	High Impact BES Cyber Systems and their associated: • EACMS Medium Impact BES Cyber Systems and their associated: • EACMS	 Initial notifications and updates shall include the following attributes, at a minimum, to the extent known: 4.1.1 The functional impact; 4.1.2 The attack vector used; and 4.1.3 The level of intrusion that was achieved or attempted. 	Examples of evidence may include, but are not limited to, dated documentation of initial notifications and updates to the E- ISAC and NCCIC.
4.2	High Impact BES Cyber Systems and their associated: • EACMS Medium Impact BES Cyber Systems and their associated: • EACMS	 After the Responsible Entity's determination made pursuant to documented process(es) in Requirement R1, Part 1.2, provide initial notification within the following timelines: One hour after the determination of a Reportable Cyber Security Incident. By the end of the next calendar day after determination that a Cyber Security Incident was an attempt to compromise a system identified in the "Applicable Systems" column for this Part. 	Examples of evidence may include, but are not limited to, dated documentation of notices to the E- ISAC and NCCIC.

11 TLP:WHITE



- Submit to E-ISAC and CISA
- No required way to submit, many options:
 - E-ISAC: Email <u>operations@eisac.com</u> or call 202-790-6000
 - Will accept DOE-417, EOP-004, CISA Incident Form, Email, Portal Post, phone call
 - CISA: <u>https://us-cert.cisa.gov/forms/report</u>
 - TIP: Fill out CISA Incident Reporting System Form and send E-ISAC the PDF
- REQUEST Please label your submission "CIP-008 Report"





From:]

Sent: Monday, May 10, 2021 5:02 PM To: <u>operations@eisac.com</u> Subject: Acme Utility Company NCRXXXXX SAMPLE US-CERT Report

As part of the NERC CIP-008- R4.2, we are informing of an attempt to compromise.

US-CERT-Report.pdf

As part of patching the Pulse Secure VPN per AA21-110A, five system files were found to be mismatched at approximately 4:50 pm ET on May 10, 2021. While mitigation is in process, we wanted to provide a notice in accordance with CIP-008-6 R4.2. There were no known impacts to any systems at this time.

Please contact me for further questions.

- **4.1.1 Impact:** "... no known impacts to any systems at this time."
- 4.1.2 Vector: "... Pulse Secure VPN per AA21-110A"
- 4.1.3 Level of Intrusion: "... five system files... mismatched"



From:

Sent: Friday, May 11, 2021 10:11 AM To: <u>operations@eisac.com</u> Subject: Acme Utility NCRXXXXX CIP-008 Report

E-ISAC,

We are informing you of an attempt to compromise of our EACMS in a Medium Control Center as part of the NERC CIP-008- R4.2. We also filled out the CISA incident report.

Functional Impact – none noted. Confirmed through analysis of OT Network logs and/or performance. Attack Vector – Malicious software introduced via a trusted patch source. Investigation is ongoing. Level of intrusion – At this time, we have identified it as a compromise and have found no indicators of compromise on the DMZ, location of the EACMS that the attempt was detected, or the OT network.

Please contact our SOC for further questions and follow-up.

- **4.1.1 Impact:** "... none noted. Confirmed through analysis of OT network logs and/or performance."
- 4.1.2 Vector: "Malicious software introduced via a trusted patch source."
- **4.1.3 Level of Intrusion**: "Compromise of our EACMS in a Medium Control Center."



Collective Defense



- Rapid Information Sharing 24x7
- Original Analysis and Threat Hunting
- CRISP
- Government Partnership
- Energy Threat Analysis Center (ETAC)
- Vendor Affiliate Program
- Collaboration with Natural Gas
- You





Questions and Answers





Engagement Timeline Adjustments

Zack Brinkman – Manager, CIP Compliance Monitoring



Overview

> Drivers for Adjustments?

≻ Audit

- 270 Day Notification
- 120 Day Audit Notification Letter
- 30 Days to Review and Comment on Draft Report

Self Certification

• 60 Day Self Certification Notification Letter





Drivers for Change

> Audit Timeline

- Appendix 4C
 - Section 4.1.1 Compliance Audit Process
 - Section 4.1.5 Compliance Audit Report
- 120 Day Audit Notification Package
 - Allows for additional time for collaboration, evidence gathering, organization and review.

Self-Certification Timeline

- Section 4.2.1 Self Certification Process
 - At least sixty (60) days in advance, the CEA requests the Registered Entity to make a Self-Certification.





270 Day Audit Notification

> What is this notification?

> Previous Process

• Notified before October 1st of proceeding year

New Process

- Rolling Calendar
- 270 Day Notification Start After April 1st
- No longer Publicly Posting Audit Schedule





120 Day Audit Notification Letter

> Previous Process

• 90 Day Notification Letter

New Process Changes

- Notification letter will be sent 120 days prior to onsite/offsite week
- Extra Days will be split between Entity and RF





Comment Period

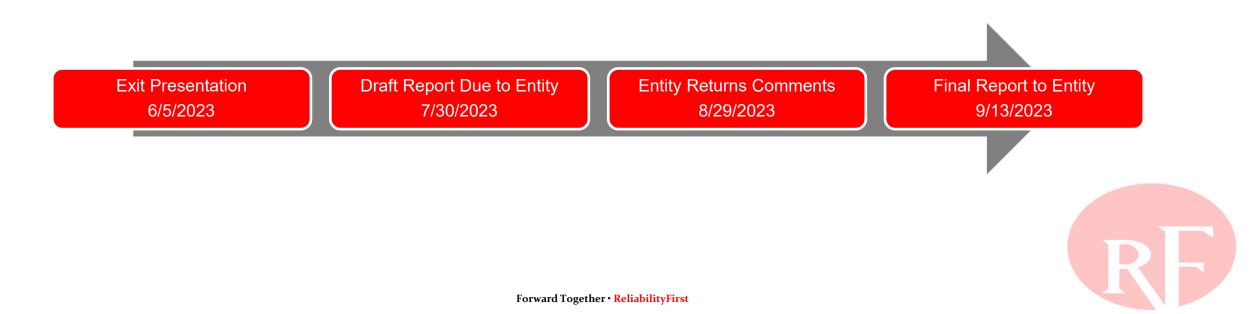
> Previous Process

• 10 Days to Review Draft Report

New Process Changes

• Entity will be allotted 30 Calendar Days to Review Draft Report





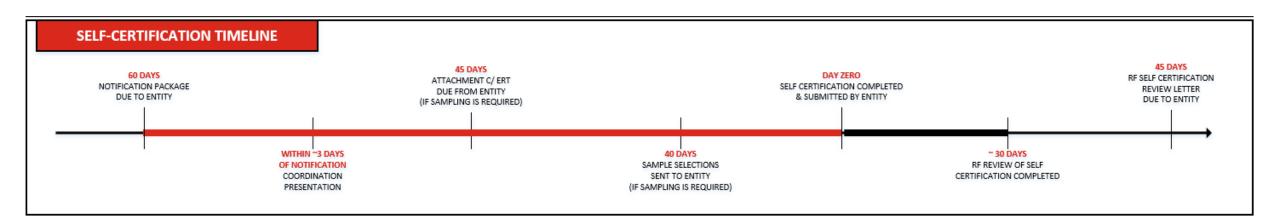
Self-Certification Timeline

> Previous Process

• Notification Package sent 30 Business Days prior to due date

> New Process Changes

- Notification Package sent at 60 Days prior to due date
- Additional time given to Entity to submit Self-Certification





Review

≻ Audit

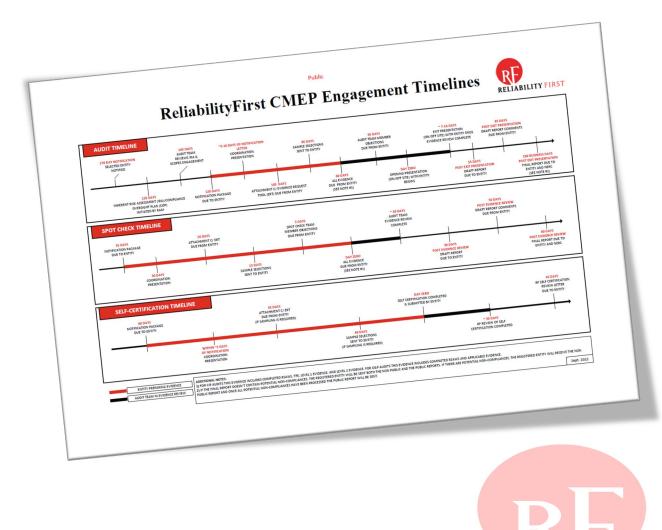
- 270 Day Notification
- 120 Day Audit Notification Letter
- 30 Days to Review and Comment on Draft Report

Self Certification

• 60 Day Self Certification Notification Letter

> Updated Timeline

 <u>https://rfirst.org/ProgramAreas/COMO/</u> > Documents



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Reception



Please join us at the Evening Reception, 5:00 – 7:00 Eastern held at the Courtyard by Marriott, Cleveland Independence located at:

5051 West Creek Road Independence, OH 44131

