##### August 27, 2019

**TO:** All Interested Parties

**FROM:** Caroline Trum, NAESB Deputy Director

**RE: Coordination with NERC**

On May 16, 2019, FERC issued a Notice of Proposed Rulemaking in Docket No. RM05-5-027 proposing to incorporate by reference, with certain exceptions, the Version 003.2 of the NAESB WEQ Business Practice Standards. This version of the standards includes several modifications that resulted from coordination with NERC, including revisions to the WEQ OASIS Suite of Business Practice Standards, WEQ-004 Coordinate Interchange Business Practice Standards, WEQ-008 Transmission Loading Relief: Eastern Interconnection Business Practice Standards, and WEQ-022 Electric Industry Registry Business Practice Standards. On June 5, 2019, NAESB filed comments in the same docket to inform the Commission of ongoing coordination efforts between NAESB and NERC that have led to the initiation of standards development activities that impact three standards proposed for incorporation by reference. These standard development efforts include Minor Correction MC19011 and two requests for standards development, Standards Request R19007 and Standards Request R19008. All the requests were submitted by NERC. The WEQ Executive Committee approved via notational ballot Minor Correction MC19011, which proposed NAESB remove references to a retired NERC Reliability Standard found in WEQ-003 OASIS Data Dictionary Business Practice Standards. The changes became effective on July 3, 2019, and NAESB filed a status report to update the Commission on July 23, 2019. NERC submitted Standards Requests R19007 and R19008 to propose that, in the interest of continued coordination between the organizations, NAESB review the requirements within the NERC MOD and INT Reliability Standards approved for retirement by the NERC Board of Trustees as part of the NERC Standards Efficiency Review. Standards Request R19008 addressing the retired NERC INT Reliability Standards was assigned to the WEQ Coordinate Interchange Scheduling Subcommittee (CISS), which on August 16, 2019 voted out a recommendation proposing modifications to WEQ-004 Coordinate Interchange Business Practice Standards to incorporate some of the retired NERC Reliability Standards requirements. Standards Request R19007 addressing the retired NERC MOD Reliability Standards was assigned to the WEQ BPS which will meet on August 27, 2019 to consider a recommendation proposing modifications to WEQ-023 Modeling Business Practice Standards to address the request.

On August 20, 2019, the WEQ Cybersecurity Subcommittee reconvened, in part, to discuss its two recurring annual plan assignments. As part of 2019 WEQ Annual Plan Item 4.b, the subcommittee is charged with evaluating the NAESB WEQ Business Practice Standards as needed to support and/or complement the current version of the NERC CIP Reliability Standards and any other activities of the FERC or NERC related to cybersecurity. To complete this assignment, the subcommittee will review revisions to the NERC CIP Reliability Standards developed in response to FERC Order No. 848 (CIP-008-6) as well as other NERC CIP Standards approved by the FERC this year (CIP-003-8). The subcommittee will also review the NERC CIP Reliability Standards under development as part of NERC Projects 2019-03 Cyber Security Supply Chain Risks, 2016-02 Modifications to CIP Standards, and 2019-02 BES Cyber System Information Access Management.

NAESB staff has also been coordinating with NERC staff regarding the development of the 2020 – 2022 NERC Reliability Standards Development Plan. NERC released the draft plan for informal comment on August 14, 2019. As has been done in the past, the WEQ Standards Review Subcommittee will meet on August 30, 2019 to review the draft plan. Any comments will be forwarded to the NAESB Managing Committee. The NERC informal comment period closes on September 5, 2019.

Additionally, NAESB is engaged in coordination activities regarding the forthcoming retirement of Peak RC as the reliability coordinator for the Western Interconnection. NAESB has been working with NERC, Peak RC, and the entities that will assume reliability coordinator responsibilities to ensure the necessary registrations in the NAESB Electric Industry Registry (EIR) are completed prior to the transition. Peak RC has presented information regarding the transition during meetings of the WEQ CISS, and NAESB staff worked with the Peak RC and the NAESB EIR system administrator to develop portions of the transition guide to assist NAESB EIR users regarding changes that may need to be made to their registry registration.