

CORONAVIRUS

FERC and NERC provided industry [guidance](#) to ensure grid reliability amid potential Coronavirus impacts.

SERC Reliability Assurance Message

SERC and the ERO Enterprise, including FERC, recognize the challenges that the Coronavirus outbreak has placed on operations, especially pertaining to personnel certification requirements, meeting periodic Reliability Standards requirements, and compliance monitoring activities by the Regions. Recently NERC and FERC issued guidance on these three topics; regulatory discretion will be applied in consideration of the uncertainties caused by our collective response and recovery from this unprecedented public health emergency. Specifically, this guidance states the following;

- The effects of the Coronavirus will be considered an acceptable basis for non-compliance with obtaining and maintaining personnel certification, as required in Reliability Standard PER-003-2, for the period of time between March 1, 2020 to December 31, 2020. Registered entities should notify their Regional Entities and Reliability Coordinators when using system operator personnel that are not NERC-certified.
- The effects of the Coronavirus will be considered an acceptable reason for case-by-case non-compliance with Reliability Standard requirements involving periodic actions that would have taken place between March 1, 2020 and July 31, 2020. Registered entities should notify their Regional Entities of any periodic actions that will be missed during this period.
- Regional Entities will postpone on-site audits, certifications, and other on-site activities at least until July 31, 2020. Registered entities should communicate any resource impacts associated with remote activities to their Regional Entities.

In applying this guidance, SERC will use regulatory discretion toward our registered entities, and will consider the impact of the recent challenges associated with the coronavirus outbreak. What

SERC Reliability Assurance Message

(Cont'd)

this means to our registered entities concerning the CMEP activities described above is that your being reliable and secure takes priority.

- SERC will not be sending out new Audit Notification Letters until August 1, 2020, at the earliest. This means we will need to make some adjustments on our 2020 audit schedule for a few registered entities that are affected by this. We are currently working to incorporate these adjustments into our 2020 schedule.
- Discretion will be used if you have challenges submitting any Periodic Data Submittals in a timely fashion by July 31, 2020. Please reach out to SERC if you anticipate being late with your submittal.
- CMEP Certification activities will pause (like onsite audits) until August 1, 2020, at earliest.

This situation is very fluid. SERC will contact the registered entities affected by the delay of audits or certifications to determine each entity's desire for moving forward with offsite work or delaying, as some may not view continuation of the current audit/certification schedule as burdensome. SERC will collaborate with the ERO, and these approaches will be reviewed and considered further beyond July 31, 2020 if the situation dictates. SERC will continue to keep our registered entities informed.

Q If a utility was forced to set up a temporary control center due to a need to isolate personnel over Coronavirus contamination that cannot be fully completed with the two current control centers (primary and backup), is there any provision that allows the entity to be released from meeting some of the CIP standards during an emergency condition such as this?

A The most relative scenarios center on our entities' responses during a natural disaster. The response below for your consideration is very prescriptive. This is because the requirements around a CIP Exceptional Circumstance are specific. Naturally, there can be flexibility in any waivers or leniency granted during this time.

For all instances during this period, SERC will consider all facts and circumstances as described in the guidance provided by NERC and FERC; however, it is incumbent on the registered entity to notify SERC of the issue, to fully describe the specific facts and circumstances for each case, and to not assume we know their specific details, should an issue arise.

SERC places criticality on all situations concerning conditions or events that impact or might impact reliable operation of the bulk power system (BPS). Cases of COVID-19, have the potential to become a CIP Exceptional Circumstance. Understanding the definition of a CIP Exceptional Circumstance and ensuring that our registered entities' existing Business Continuity Plans address the require-

ments identified for a CIP Exceptional Circumstance is paramount.

Glossary definition of CIP Exceptional Circumstance:

A situation that involves or threatens to involve one or more of the following, or similar, conditions that impact safety or BES reliability: a risk of injury or death; a natural disaster; civil unrest; an imminent or existing hardware, software, or equipment failure; a Cyber Security Incident requiring emergency assistance; a response by emergency services; the enactment of a mutual assistance agreement; or an impediment of large scale workforce availability.

Some examples of CIP Exceptional Circumstances include the standards and requirements identified below. Please remember, this list includes only CIP standards, and is not conclusive. Others, such as PER-003-2 and PRC-005-6 might also be affected.

- CIP-003-7 R2 Attachment 1 Section 5
- CIP-004-6 R2 Part 2.2
- CIP-004-6 R4; Part 4.1
- CIP-006-6 R2 Part 2.1, 2.2
- CIP-007-6 R4 Part 4.3
- CIP-010-2 R3 Part 3.3 and R4

Exemption request(s) should be made to NERC for consideration, and they may consider issuing a blanket statement on the potential impact of COVID-19 on the day-to-day operations and compliance of the BES.

Please take a moment to review the guidance provided in the recent announcement from NERC and FERC. Contact support@serc1.org with questions.