

Midwest Reliability Organization: Kansas Corporation Commission Education Session

Tasha Ward, J.D., CCEP

Director of Enforcement and External Affairs

Bryan Clark, P.E.

Director of Reliability Analysis

Mark Tiemeier, P.E.

Principal Technical Advisor

February 8, 2023

CLARITY ASSURANCE RESULTS

Introductions





Mark Tiemeier joined the Midwest Reliability Organization in July 2022 as Principal Technical Advisor. Prior to joining MRO, Mark worked for 15 years at Xcel Energy and 2 years at Midcontinent Independent System Operator, in engineering and supervisory roles within transmission system operations. Mark is a registered Professional Engineer in the state of Minnesota.



Bryan Clark, PE, Director of Reliability Analysis

Bryan Clark joined the Midwest Reliability Organization in June 2018 as a Sr. Operations Engineer and was promoted to Director of Reliability Analysis in January 2019. Bryan has over 17 years of experience working with electric utilities, including time at Entergy and Southwest Power Pool, Inc.



Tasha Ward, Director of Enforcement and External Affairs

Tasha Ward joined the Midwest Reliability
Organization in October 2019 and holds the
position of Director of Enforcement and External
Affairs. Tasha has over 13 years of industry
experience working within the Electric Reliability
Organization, including time at the Southwest
Power Pool Regional Entity, SERC Reliability
Corporation, and Southwest Power Pool, Inc.



Agenda

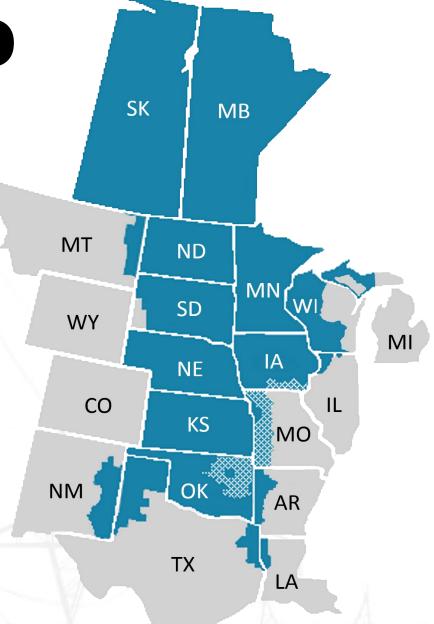
- About MRO
- Reliability Analysis
- Regional Risk Assessment



About MRO

Company profile:

- Incorporated in 2002; began operations in 2007
- Headquartered in St. Paul, MN
- Regional footprint includes more than 220 registered entities





Our History

Incremental steps ...

MRO began to question zero-tolerance enforcement approach; offered solutions such as zero-dollar penalties and ACP/FFT

RAI pilot projects completed in all eight regions; reviewing lessons learned, developing implementation plans Improved stakeholder engagement with the Advisory Councils, NSRF, Threat Calls, etc.

2018

2020

2012

MRO proposed a risk-based pilot program to NERC and the Regions that eventually became RAI

Doubled Our Size: Enhanced Compliance Oversight Plans (COPs); timely regulatory interventions continues to be more adaptive to risks

2007

Start-up of mandatory regime; prescriptive, zero-tolerance-based regulation

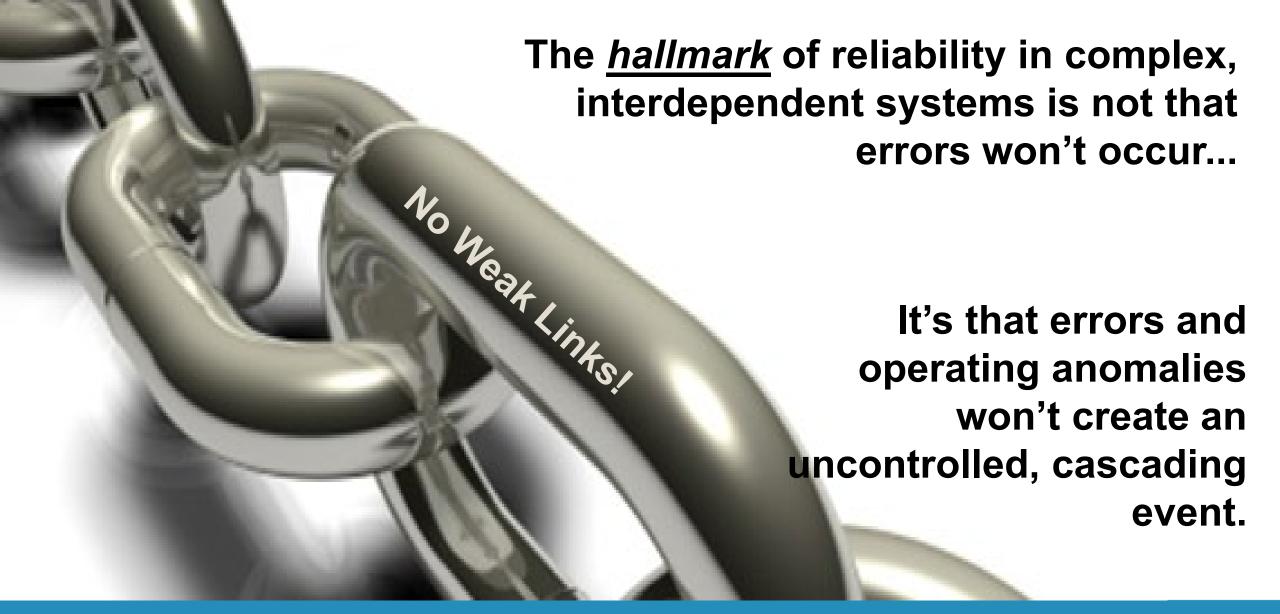
... big strides for reliability and security



Our Vision:

A highly reliable and secure North American bulk power system.





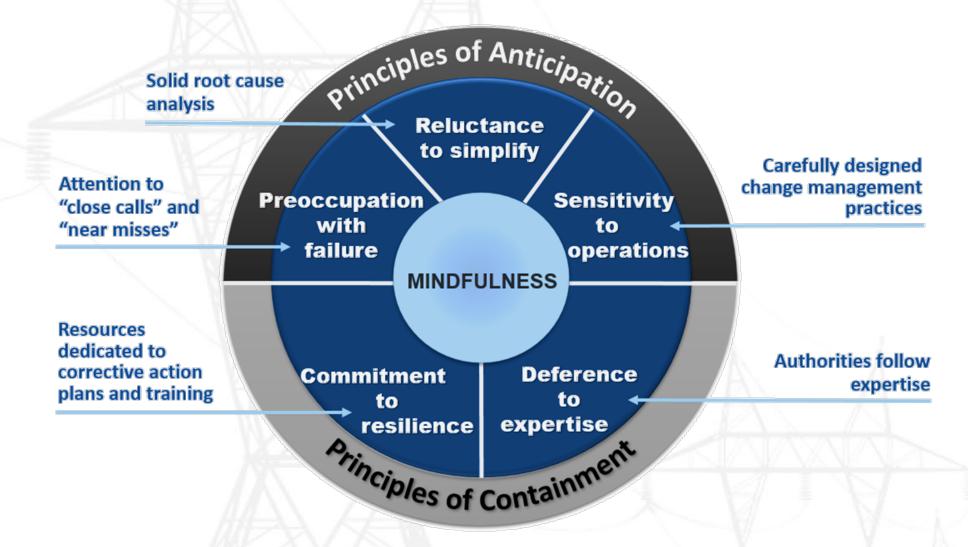
What It Means To Be Reliable

MRO's Mission Supports the Vision

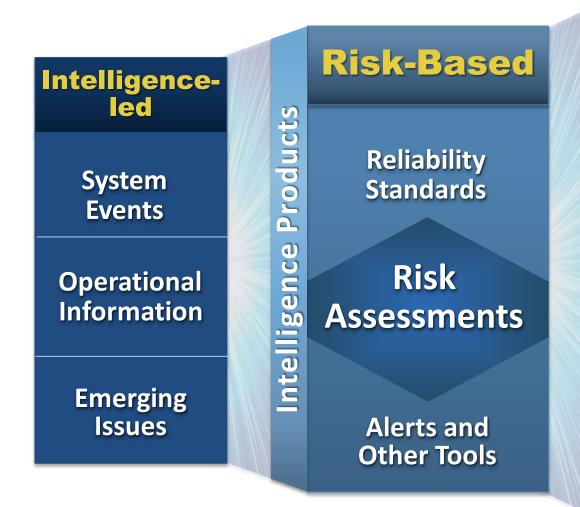
To identify, prioritize and assure effective and efficient mitigation of risks to the reliability and security of the North American bulk power system by promoting Highly Effective Reliability Organizations (HEROs).

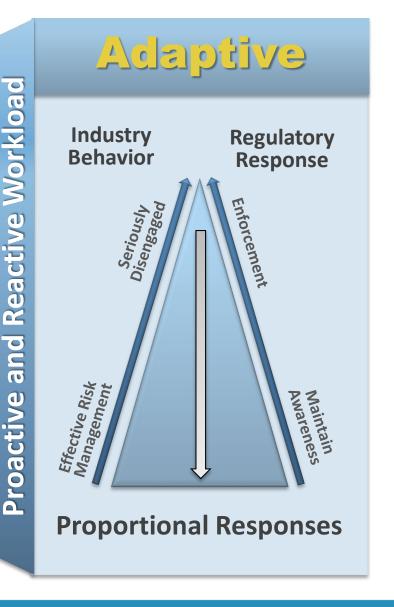


Key Characteristics of HEROs









Supporting the Work of HEROs

A Risk-Based Regulatory Approach

MRO's Organizational Groups

- MRO leverages its members' experience and expertise on several organizational groups
- MRO's organizational group structure consists of three advisory councils:
 - CMEP Advisory Council
 - Reliability Advisory Council
 - Security Advisory Council
- Several subgroups reside under the councils



Important Work of the Councils

CMEP Advisory Council activities:

- Work to integrate HRO theory and principles in support of MRO's Mission
- Provide a forum for registered entities to discuss and comment on new or revised NERC Reliability Standards
- Develop industry guidance on the application of existing and proposed NERC Reliability Standards
- Provide guidance to regional stakeholders on sound governance risk and internal control programs
- Foster industry peer assistance and networking



Important Work of the Councils

Reliability Advisory Council activities:

- Work closely with regional Planning Coordinators to understand regional risks, like the changing resource mix
 - Track regional risks; provide mitigating strategies, lessons learned and other guidance to regional stakeholders
- Review and provide input on North American-wide and regional reliability assessments
- Review regional system events and misoperations to identify trends and mitigation approaches; provide technical input to staff
- Assess the various human performance aspects of system operator functions, field technicians, design engineers, and others
- Support MRO's stakeholder outreach efforts by sponsoring and leading the implementation of MRO conferences and events



Important Work of the Councils

Security Advisory Council activities:

- Promote security of the regional bulk power system, focusing on cybersecurity, physical security and SCADA, EMS, and substation and/or generation control systems
- Identify and track regional security risks and distill information on security-best practices and lessons learned
- Maintain collaborative relationships with E-ISAC, DHS, FBI, and other federal and provincial intelligence agencies
- Increase information-sharing through weekly threat calls and regional security contact lists
- Provide technical expertise to staff and input on MRO's Regional Risk Assessment
- Identify areas for guidance and training and provide outreach to MRO stakeholders on important security-related topics



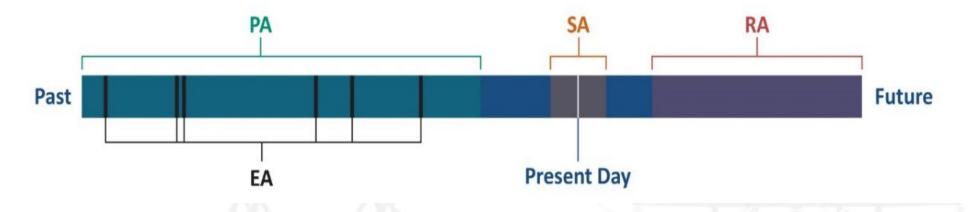
About MRO's Reliability Analysis Department

What we do:

- Reliability Assessments
- Bulk Power Situational Awareness
- Event Analysis
- Performance Analysis
- Entity Registration and Certification









Reliability Assessments

- Review, assess, and report on the overall electric generation and transmission reliability of the interconnected Bulk Power System.
- NERC Reliability Assessment Subcommittee (RAS)
- 3 Annual reports
 - Winter Reliability Assessment
 - Summer Reliability Assessment
 - Long Term Reliability Assessment



Reliability Assessments

- 2 Internal Assessments with an emphasis on the MRO region
 - Regional Winter Assessment
 - Regional Summer Assessment



2022 Long-Term Reliability Assessment

NERC

The LTRA identifies reliability trends, emerging issues, and potential risks to the bulk power system over a 10-year horizon.

NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

High Risk

Anticipated reserves fall below Reference

Margin Levels, and energy risks exist in normal peak demand conditions during one or more years:

California-Mexico

The addition of new resources and retention of key generators is alleviating near-term capacity shortages, but energy risks persist. Variable resource output and changing demand could cause energy shortfalls that range from 1–10 hours.

MISO

A projected shortfall of 1,300 MW occurs next summer and continues to grow throughout the 10-year assessment period as coal, nuclear, and natural gas generation retire faster than replacement resources are connecting.

California-Mexico

Ontario

A reserve margin shortfall of 1,700 MW begins in 2025 and continues to grow throughout the 10-year assessment period due to generation retirements and lengthy planned nuclear maintenance outages.

High Risk

U.S. Northwest

Shortfalls may occur at normal peak conditions

U.S. Southwest

Elevated Risk Shortfalls may occur in

severe conditions

Ontario

Elevated Risk

Reserves meet resource adequacy criteria, but the risk of energy shortfalls exists in severe hot or cold weather (90/10 extreme event):

U.S. Northwest and Southwest

The risk of energy shortfalls from wide-area, long-duration heat events are expected to increase. Coal and natural gas generation retirements and lower amounts of hydro availability threaten reliability over the next 10 years. With high reliance on energy transfers, wide-area severe weather poses an increased risk to electricity supplies and transmission network impacts.

Texas

While steps have been taken since Winter Storm Uri, reliability continues to be threatened in severe winter weather conditions by generator outages, the potential for natural gas supply disruptions, and abnormally high electricity demand during cold weather.

New England

With a high reliance on natural gas generation, liquefied natural gas and stored backup fuels remain critical to reliability over the next 10 years. Units with stored backup fuels are threatened by market conditions. Fuel availability and replenishment is challenged in severe winter weather. Over the long-term, infrastructure contingencies become reliability risks during any time of the year.

SPP

Energy shortfalls are likely during low-wind, high demand periods.

Key Trends

Retirements

More than 88 GW of generating capacity is confirmed for retirement over the assessment period (similar to the 10-year projection in the 2021 LTRA) with an additional 22 GW of generators that could retire within the next five years. It is critical that the pace of generator retirements be managed until solutions are in place that can continue to meet energy needs and provide essential reliability services.

Demand Growth

For the first time in recent years, electricity peak demand projections are increasing. Adoption of electric vehicles and other energy transition programs will significantly influence demand.

Flat Transmission Growth

Transmission development projections remain near the five-year averages and less than 15% of projects are driven by new resource integration. Large-scale regional projects are needed to interconnect the volume of wind and solar generation in development and meet regional demand.

Integration of Inverter-Based Resources

More than 70% of new generation in development is solar, wind, and hybrid-battery, making reliable integration of new resources paramount.

Growth in Distributed Energy Resources

Solar photovoltaic distributed energy resources are projected to reach more than 80 GW by the end of this 10-year assessment, a 25% increase in projection since the 2021 LTRA.



Long-Term Reliability Assessment

- 10-year assessment of resource capacity and energy risks
- Uses industry's demand and generation forecasts and transmission projections





SPP Assessment Area

- Reserve Margins are above the Reference Margin Level through the 10 year assessment period
- Slight increase in Internal Demand over the assessment period
- Steady increase in wind generation across the SPP assessment area



Resource Mix

- Over 88 GW of fossil-fired and nuclear generating capacity is confirmed for retirement during the assessment period
- Additional 22 GW could retire within the next five years and exacerbate capacity and energy shortfalls
- Robust planning processes for managing the pace of generator retirements are needed to prevent energy risks and system reliability issues



Resource Mix

- Capacity of Retiring Generation through 2027
- Wind, solar, and hybrid lead the transition

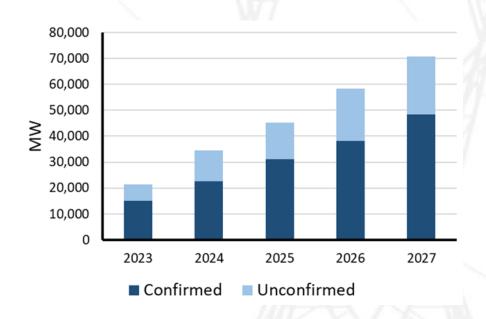


Table 1: 2022 Capacity at Peak Demand				
Туре	Capacity (GW)	Change since 2021 (GW)		
Natural Gas	477	+14		
Coal	202	-18		
Nuclear	106	-2		
Solar and Wind	70	+19		
All others	189	+2		

Contributions at hour of peak demand. VER (solar, wind, and some hydro) typically count less than installed nameplate capacity.



LTRA Recommendations

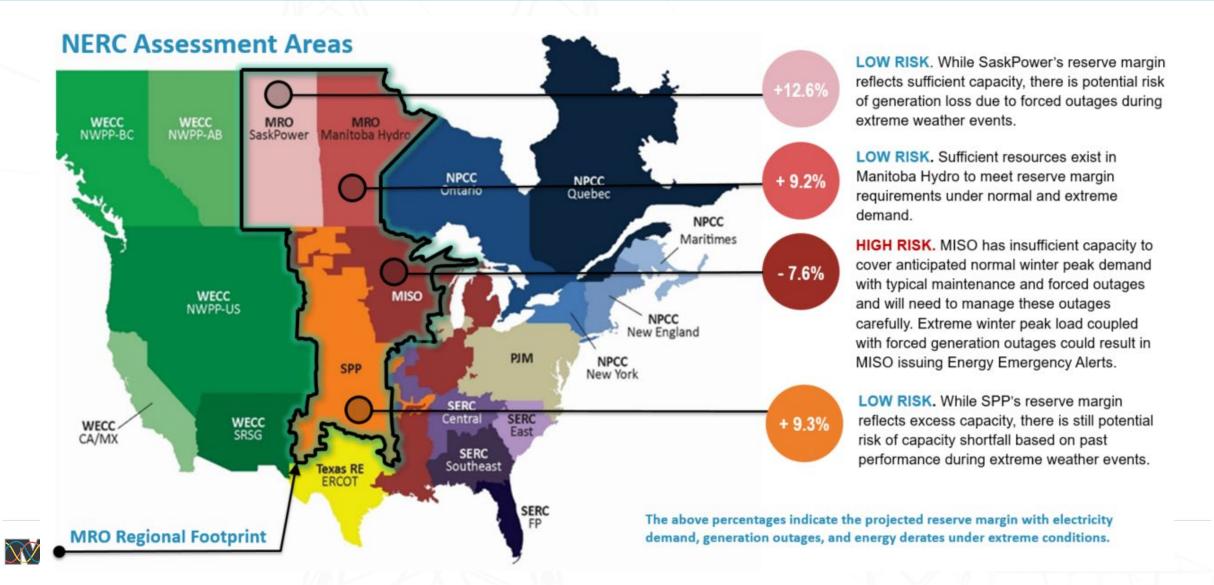
- Manage the pace of generator retirements to ensure energy and essential reliability services needs are met
- Promote use of extreme weather scenarios in resource planning
- Expand resource adequacy evaluations beyond reserve margins to include energy risks for all hours and seasons
- Mitigate risks from interdependent natural gas infrastructure
- Address performance and integration issues with solar and wind
- Increase focus on operating with more distribution resources
- Consider the impact of electrification on future electricity demand and infrastructure





2022 Regional Winter Assessment

Elevated areas of risk that will require increased monitoring during the upcoming winter season



Normal Peak Demand with Typical Outages

Assessment Area	Anticipated Resources	Typical Maintenance and Forced Outages	Anticipated Resources with Typical Outages	Net Internal Demand	Anticipated Reserve Margin with Typical Outages	Reserve Margin Requirements
МН	5,418	85	5,333	4,588	16.2%	12.0%
MISO	141,565	28,818	112,747	98,939	14.0%	17.9%
SPC	4,779	249	4,530	3,714	22.0%	15.0%
SPP	70,772	10,600	60,172	41,637	44.5%	16.0%

Anticipated Reserve Margin for Normal Forecast with Typical Outages

MISO has insufficient resources under normal winter peak demand with typical outages



Extreme Winter Resource and Peak Demand Scenario

Assessment Area	Anticipated Resources with Typical Outages	Extreme Derates	Extreme Low Generation	Operational Mitigations	Extreme Low Generation + Operational Mitigations	Extreme Peak Load
МН	5,333	0	5,333	0	5,333	4,882
MISO	112,747	17,624	95,123	2,400	97,523	105,513
SPC	4,530	123	4,407	0	4,407	3,914
SPP	60,172	11,940	48,232	0	48,232	44,137

Extreme Winter Resource and Peak Demand Scenario (in MWs)

• MISO resources fall significantly below the extreme peak load likely need to issue EEAs



Normal vs. Typical Outages vs. Extreme Scenario



Assessment	Reserve Margin	Anticipated	Typical	Extreme
Area	Requirements	Reserve Margin	Outages	Conditions
МН	12.0%	18.1%	16.2%	9.2%
MISO	17.9%	43.1%	14.0%	-7.6%
SPC	15.0%	28.7%	22.0%	12.6%
SPP	16.0%	70.0%	44.5%	9.3%



Regulator Recommendations

- Preserve critical generation resources at risk of retirement ahead of the winter season to maintain reliability.
- Understand requests for environmental and transportation waivers that place fuel at risk.
- Support electric load and natural gas distribution company conservations and public appeals during emergencies.
- Seek local policies that continually balance new and different generation resources with increased power demand.



Industry Recommendations

- Review NERC level 2 alert related to cold weather preparedness and participate in MRO's voluntary Generator Winterization Program.
- Maintain situational awareness of unplanned generation outages and low wind forecasts and employ operating mitigations when needed during extreme weather conditions.
- Assess and develop new and better methods to evaluate supply adequacy, especially when a significant amount of generation capacity has an intermittent fuel source that is difficult to forecast.



MRO Regional Risk Assessment

Actions Identification Purpose: Identify and prioritize risks for the reliable and secure operations of the bulk power system within the MRO footprint. Inform MRO's strategic plan Report **Prioritization** and guide development of actions to address risks.

Validation

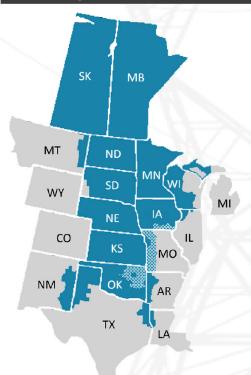




MRO 2023 Regional Risk Assessment

Top risks to the reliable and secure operation of the North American bulk power system in MRO's regional footprint.

Territory



About Us

As part of the **ERO Enterprise**, MRO is committed to a shared mission to identify, prioritize and assure effective and efficient mitigation of risks to the reliability and security of the North American bulk power system in its regional footprint.

Read more at www.MRO.net

MRO Reliability Risk Matrix: Risk Rankings

			LOW				
	nsequence/	L1	L2	L3	L4	L5	MILE.
Impact (C)		Very Unlikely	Unlikely	Possible	Likely	Almost Certain	MEDIUM
C5	Severe						
C4	Major				4,5,6,16		IIICII
C3	Moderate		2	9,12,13	1		HIGH
C2	Minor			3,7,8,10,1 4,17	15		EXTREME_
C1	Negligible			11			all.

	LOW	
	MEDIUM	•
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READ MRO'S 2023 REGIONAL RISK ASSESSMENT

Assessment Overview

- Extreme weather, consumer demand, and changes in technology and generation resources continue to present a rapidly increasing number of challenges to grid planners and operators. Physical and cyber security risks also continue to evolve at an unprecedented pace.
- MRO's annual Regional Risk Assessment considers continent-wide risks to reliability and security of the North American bulk power system and determines which are more likely to occur and would have a higher impact in MRO's region.
- This report is focused on risk identification, prioritization and mitigation and highlights for industry the priorities needed to collaboratively address these challenges. It also serves to inform key decision makers of challenges the industry faces and the policies and regulations that will help define a variety of proposed solutions.

Key Findings: Top Reliability and Security Risks in MRO's Territory

Top risks are reflected in orange above and described below. A full list of risks assessed can be found in the final report.

Model **Assumptions**



RISK 1. Assumptions used in bulk power models to plan and operate the grid have not accounted for the rapid increase in inverter-based and distributed energy resources, challenging industry's ability to accurately assess current and future system characteristics.

Planning Reserves



RISK 4. Traditional methods to calculate Planning Reserve Margin are inadequate to properly plan for the generation capacity needed to meet increasingly uncertain system operations, especially during extreme weather events.

Energy Reliability



RISK 5. Increased uncertainty from changing energy supply and customer demand challenge the grid's ability to meet load for all hours of the year. There is no comprehensive planning that assesses assurance of available energy and fuel sources over all time periods to maintain grid reliability.

Generation Unavailability



RISK 6. Generation RISK 12. Use of constant availability assumed overhead transmission during cold weather, line ratings year-round particularly in the (non-seasonal) limits available transmission southern U.S., has capacity and leads to been shown to be unrealistically high inefficient real-time decisions when system due to a lack of conditions deviate from generation assumptions that drive winterization and rating calculations, such natural gas as cooler temperatures curtailments. or during emergency

Transmission Line Ratings



operations.

RISK 9. Employees or contractors using their knowledge and authorized access of critical systems to do harm to the bulk power system is a continued, substantial threat to organizations and the reliability of the grid.

Insider Malware/ **Threats** Ransomware



RISK 13. Phishing attacks can introduce malware or ransomware to corporate IT systems, which can impact critical systems necessary for reliable bulk power system operations through direct or in-direct connections those systems have to IT networks.

Supply Chain Compromise



RISK 16. A cyber security event carried out through the vendor supply chain can broadly impact bulk power system reliability, especially where the vendor is a market leader providing systems used for system operation.



CLARITY ASSURANCE RESULTS

Conservative Practices to Calculate Planning Reserve Margin (PRM)

		Likelihood (L)			
Cor	sequence /	L2	L3	L4	
Ir	mpact (C)	Unlikely	Possible	Likely	
С4	Major		2021	2022, 2023	
С3	Moderate				
C2	Minor				

PRM = Margin between Anticipated Generation & Anticipated Load

To calculate PRM, need several assumptions

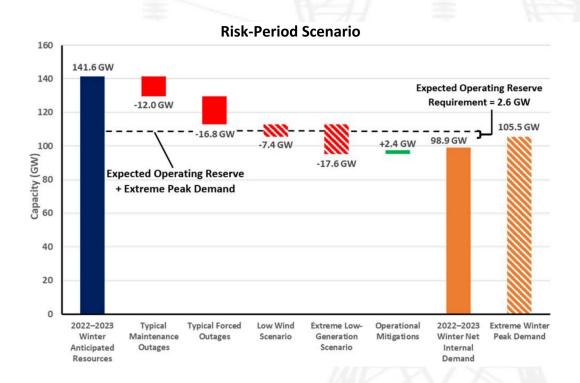
- Accredited generation capacity
- Expected generation outages (planned and forced)
- Forecasted peak load



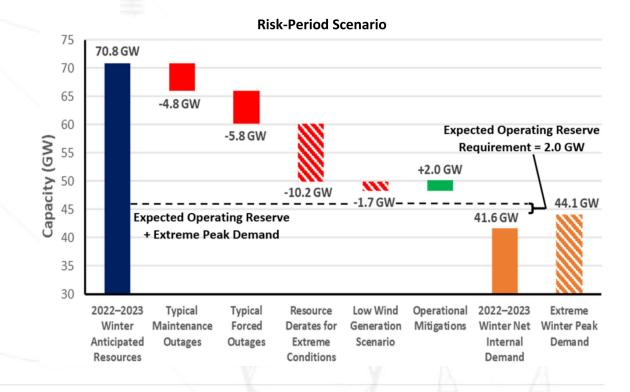
Conservative Practices to Calculate PRM

		Likelihood (L)		
Cor	sequence /	L2	L3	L4
lı	mpact (C)	Unlikely	Possible	Likely
С4	Major		2021	2022, 2023
СЗ	Moderate			
C2	Minor			

MISO Winter '22/23



SPP Winter '22/23

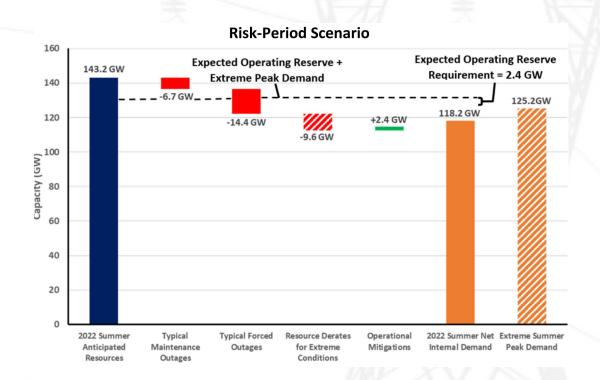




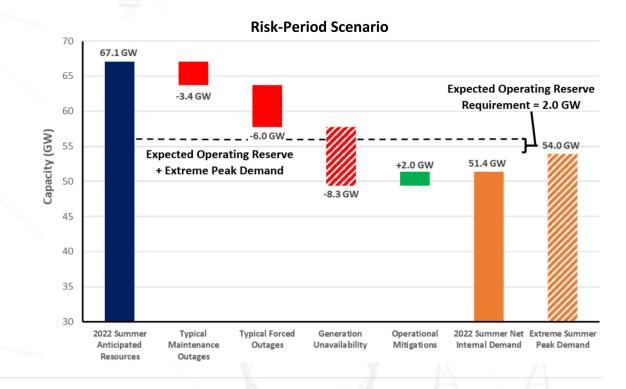
Conservative Practices to Calculate PRM

		Likelihood (L)		
Cor	sequence /	L2	L3	L4
lı.	mpact (C)	Unlikely	Possible	Likely
С4	Major		2021	2022, 2023
СЗ	Moderate			
C2	Minor			

MISO Summer '22



SPP Summer '22





Energy Reliability Planning

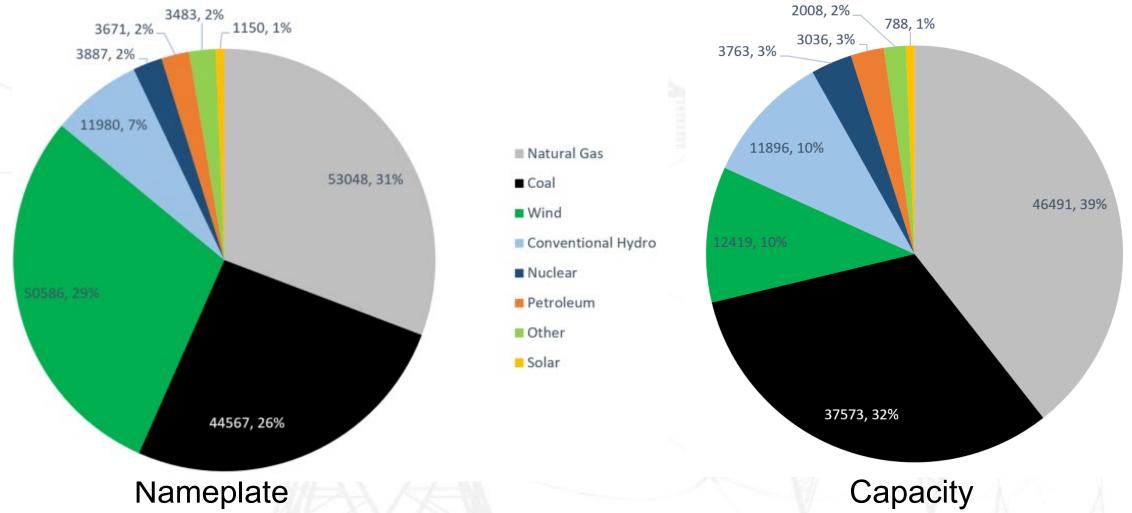
- Energy availability needed for 8,760 hours a year
- Account for:
 - Unassured fuel supplies
 - Inconsistency of variable generation output
 - Volatility in forecasted load

		Likelihood (L)			
Cor	sequence /	L2	L3	L4	
Ir	mpact (C)	Unlikely	Possible	Likely	
С4	Major		2022	2023	
С3	Moderate				
C2	Minor				



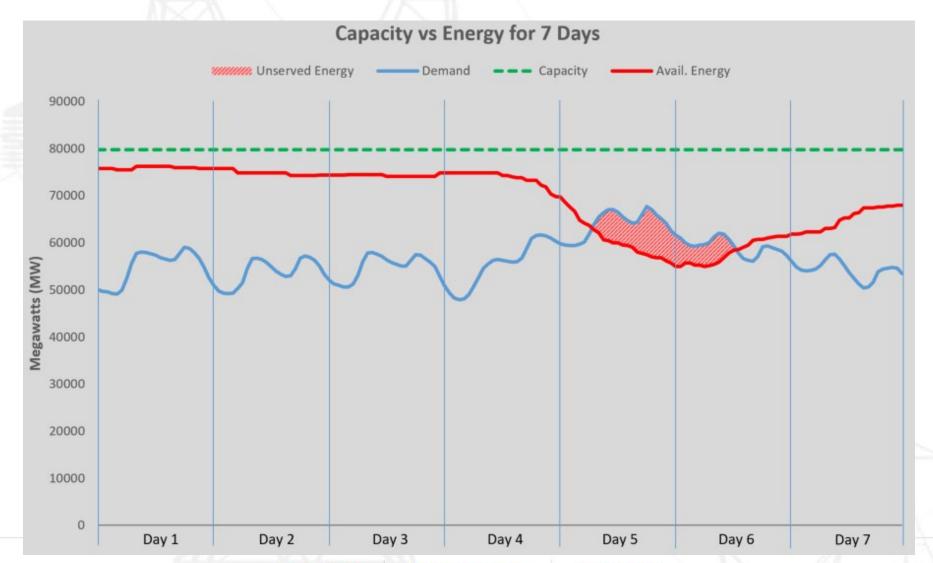


MRO Nameplate vs. Capacity





Capacity ≠ Energy





Generation Unavailability during Extreme Cold Weather

		Likelihood (L)			
Cor	sequence /	L2	L3	L4	
Ir	mpact (C)	Unlikely	Possible	Likely	
С4	Major			2022, 2023	
С3	Moderate				
C2	Minor				

- Natural gas generation not winterized for sub-freezing temperatures (especially southcentral US)
- Electric/Gas infrastructure interdependencies
- Forced outages strain energy availability to meet load





Generation Unavailability during Extreme Cold Weather

		Likelihood (L)			
Cor	sequence /	L2	L3	L4	
Ir	mpact (C)	Unlikely	Possible	Likely	
С4	Major			2022, 2023	
СЗ	Moderate				
C2	Minor				

- MRO Generator Winterization Program
- Cold Weather Preparedness Workshop
- NERC Alert: Cold Weather Preparations for Extreme Weather Events
- NAESB Gas-Electric Forum





New NERC Industry Group

Energy Reliability Assessments Task Force (ERATF)



Ensuring Energy Adequacy with Energy Constrained Resources

December 2020 White Paper

Unassured faet supplies, "including the timing and inconsistent output from variable renewable energy resources, fuel location, and volatility in forecasted lods, relating the insufficient amounts of energy on the system to serve electrical demand and ensure the reliable operation of the bulk power system (IPS)

Electricity 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 permeates every aspect of our economy, and policy makers are seeking to electrify transportation and heating in order to decarbonize the economy. The BPS is undergoing an

Historically, analysis of the resource adequacy of the BPS focused on capacity over peak time periods. Assessment of resource adequacy focused on capacity reserve levels compared to peak 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 are calculated from probabilistic analysis using generating unit forced outage rates based on randor equipment failures derived from historic performance. The targeted level has historically been one event in ten years, based on daily peaks (rother than hourly negro; obligations), dailottani langisht were traditional plained by also calculating loss of-load hours and expected unserved energy based on the mean-time to repair unit wavenges. Review and calification of south radiolism affertist an eneeded to understand their assumptions and put forward additional meningful measures that support key aspects of capacity and energy delivers.

the requisite energy. This is not surprising as generally fuel availability was assured with either long-term

RELIABILITY | RESILIENCE | SECURITY





Overhead Transmission Line Ratings

		Likelihood (L)					
Consequence /		L2	L3	L4			
Impact (C)		Unlikely	Possible	Likely			
С4	Major						
СЗ	Moderate		2023				
C2	Minor		2021, 2022				

 Seasonal and emergency ratings not fully used

Impact of FERC Order 881-A



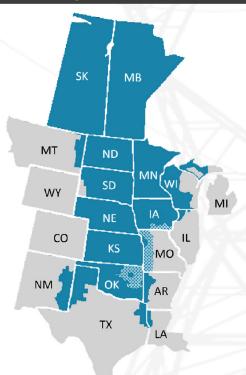




MRO 2023 Regional Risk Assessment

Top risks to the reliable and secure operation of the North American bulk power system in MRO's regional footprint.

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Key Findings: Top Reliability and Security Risks in MRO's Territory

Model Assumptions



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Generation Unavailability



RISK 6. Generation availability assumed during cold weather, particularly in the southern U.S., has been shown to be unrealistically high due to a lack of generation winterization and natural gas curtailments.

Transmission Line Ratings



RISK 12. Use of constant overhead transmission line ratings year-round (non-seasonal) limits available transmission capacity and leads to inefficient real-time decisions when system conditions deviate from assumptions that drive rating calculations, such as cooler temperatures or during emergency operations.

Insider Threats



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Malware/ Ransomware



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CLARITY ASSURANCE RESULTS

Upcoming Events

2023 Regional Risk Assessment Webinar

March 8, 2023, WebEx 10:00 to 11:00 a.m. Central

Agenda Topics

- Regional Risk Assessment Overview
- Review of the top Risks in the MRO Region
- Q&A for attendees

Presenter

Mark Tiemeier, Principle Technical Advisor, Midwest Reliability Organization

Registration

There is no fee for attendance. Register to attend this webinar here.

Registration closes on March 7, 2023.

MRO Annual Reliability Conference

May 17th, 2023 MRO Office 380 St. Peter Street, Suite 800 St. Paul, MN

In-Person or Virtual Option

Agenda Topics

- Facility Ratings Best Practices
- **Battery Storage**
- **Human Performance**

2023 MRO Hybrid Reliability Conference - Midwest Reliability Organization



References

- www.mro.net
- 2022 NERC Long Term Reliability Assessment
- 2022 MRO Regional Winter Assessment
- 2023 MRO Regional Risk Assessment



Questions

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