

# Reliability Standards Standing Committee (RSSC)

Minutes of Meeting #36

January 17<sup>th</sup>, 2017 | 9:30 AM – 3:00 PM | Room 1805, 120 Adelaide St. W., Toronto

## Attendance

Participant Name	Company Name	Attendance Status
Ben Li	IESO	Present
Dave Dunn	IESO	Present
David Kwan	OPG	Present
David Kiguel	<i>Observer</i>	Present
Christian Dragnea	IESO	Present (on the phone)
Constantin Chitescu	OPG	Present
Esia Giaouris	Hydro One	Present
Gord Bartels	Transalta	Present (on the phone)
Hajar Kacem	Transalta	Present (on the phone)
Helen Lainis	IESO	Present
Jay Jayaraman	Enbridge	Present
Jon Veldhuizen	Northland Power Inc.	Present
Jason Grbavac	IESO	Present
Jim Cook	Hydro One Sault Saint Marie	Present (on the phone)
Dave Devereaux	IESO	Present
Laurie Reid	Ontario Energy Board	Present
Mike Yealland	MYCON Inc.	Present
Mohad Elnashar	IESO	Present
Monica Adam	IESO	Present
Paul Whitehead	Bruce Power	Present
Rob Clemence	IESO	Present
Ron J. Falsetti	AESI	Present
Scott Berry	IESO	Present
Soon Chua	Portlands Energy Centre	Present
Steve Dale	Hydro One Sault Saint Marie	Present
Tracy Brason	Brookfield Renewable Power	Present

Scribe: Navneet Singh

[rssc@ieso.ca](mailto:rssc@ieso.ca): Please report any corrections, additions or deletions to scribe.

All meeting materials are available on the IESO's RSSC webpage at:

<http://www.ieso.ca/Pages/Participate/Stakeholder-Engagement/Standing-Committee/Reliability-Standards-Standing-Committee.aspx>

**References:**

IESO MACD page: <http://www.ieso.ca/Pages/Participate/Market-Oversight/Compliance-Enforcement.aspx>

IESO Reliability Standards Compliance page: <http://www.ieso.ca/Pages/Participate/Reliability-Requirements/Reliability-Standards-Compliance.aspx>

NERC Standards page: <http://www.nerc.com/page.php?cid=2>

NPCC Regional Standards/Criteria page: <https://www.npcc.org/Standards/default.aspx>

FERC Electric page: <http://www.ferc.gov/industries/electric.asp>

Action Item Summary as of the 36 <sup>th</sup> Meeting			
#	Date	Action	Status
1			
2			
3			

## 1. Welcome and Introductions

The thirty-sixth RSSC meeting commenced at 9:30 a.m. with brief introductions by each participant.

## 2. Administrative Issues

a) The agenda for the meeting was reviewed and no new agenda items were added. Motions to adopt the agenda by *L. Reid* and *E. Giaouris*. The agenda will be revised to correct the date in the footer and will be reposted on the website.

b) The minutes of the last (thirty fifth) RSSC meeting were reviewed page by page. No major concerns were raised. Motions to adopt the meeting minutes as final were made by *J. Jayaraman* and *T. Brason*.

*L. Reid* noted the incorrect spelling of her name. The minutes will be updated with the correct spelling and posted on the website.

*J. Jayaraman* asked about the webinar regarding Item 4 – Market Manual 11.1, Applicability Criteria Update. *S. Berry* stated that the date for the webinar has not yet been scheduled.

c) Updates on the open action items were provided as follows:

- *No action items from previous meeting.*

d) RSSC Roster updates: Changes to the members of the RSSC distribution list can be emailed to Scott Berry or [orcp@ieso.ca](mailto:orcp@ieso.ca). Changes will be made upon request. The distribution list was updated to include additional members from Brookfield Renewable Power and Bruce Power.

## 3. 2017 Reliability Standards Compliance Monitoring Plan (CMP)

*M. Adam* presented the 2017 Reliability Standard CMP. She noted that this year MACD will be auditing some participants. Also included in the plan will be the data submissions; MACD's intention is to have a one stop shop. When developing the CMP, MACD looked at several factors such as NERC and NPCC monitoring, any vulnerabilities affecting the system, compliance history with standards, etc. They came up with six priority areas: Critical Infrastructure Protection, Communication, Emergency Preparedness, Maintenance and Management of BES Assets, Response to Reliability Directives and IESO Data Requests, and Protection Systems Failures. *E. Giaouris* asked if MACD was going to focus on these six areas for the audit. *M. Adam* stated that all standards are still subject to being selected for the audit.

TransCanada noted that they were confused about the differences in providing evidence for spot checks and for self-certifications. *C. Dragnea* indicated that spot-checks are another tool MACD can use that has more flexibility. For example, spot check could be done on one standard (or requirement) only. He also noted that spot checks may go away in time if self-certifications end up requiring more time to complete and provide the same level of assurance as spot-checks. In the meantime, MACD will continue to use the full spectrum of tools available.

*T. Brason* asked if loose ends will be treated differently for audits and self-reporting. *M. Adam* stated that they would be treated the same, both will require a follow-up investigation into the possible non-compliance. She also noted that self-reporting is taken into account for assessing the penalties when MACD determines that non-compliance occurred.

MACD noted for each quarter, they will select a few areas for self-certification starting in Q2 of 2017. *R. Falsetti* noted that regions provided a full schedule for 2017. *M Adam* and *S. Berry* indicated that NPCC does not provide a self-certification list (as an official list is not posted). The MRO does post a list but regional entities are different.

*E. Giaouris* asked if the IRA has been completed for all entities. *C. Dragnea* stated that they have not developed a formal process similar to NPCC. MACD used information such as compliance history, number of assets, voltage, etc., to create the risk profiles. A participant asked if it will be possible to have a formal IRA process in 2018. *C. Dragnea* said the plan is to develop a process for 2018 with market participants. *H. Lainis* noted it has been a positive experience with NPCC so far. *R. Falsetti* has noted that some other entities have not had a lot of success and there could be inconsistencies in regions.

*D. Kwan* asked if when MACD requests guided certifications if it's their intention for larger participants with (many) facilities to be more specific with the data request or leave it open to the entire fleet. *M. Adam* noted that they will try to be as specific as possible.

*C. Dragnea* also noted that MACD is embarking on a program similar to the ICE program in Ontario and will present it for discussion when they get to that point.

*J. Jayaraman* asked if notifications for self-certifications and spot checks will be received together. *M. Adam* indicated that the notifications will be separate for self-certifications and spot checks and also noted that the tool will be used for submissions. If not available in tool, MACD will let participants know where to submit.

*S. Chua* enquired about whether all Market Participants will receive a notification and what actions they need to take if they do not hear from MACD. *M. Adam* stated that participants will only hear from MACD when they need something from them. If a participant does not receive a notification from MACD, then no action is required from the participant.

#### **4. Applicability Criteria**

*H. Lainis* updated the group on the applicability criteria document. The document is posted on website, as of March, for baseline process for comments. It includes data specifications from the Reliability Coordinator and the Balancing Authority. The listed references are found in Appendix 4.15 and 4.16 in Chapter 4 of the Market Rules. The data format is referenced in Appendix 4.169, 4.20, and 4.21. The IESO noted the following on the document:

- Page 15: PRC-002-NPCC-01 - When we wrote this, we only had the BPS definition in effect, but with expanded definition, we had to remove statement to require DDR for some participants.
- Page 17: Reference to quick take that *R. Clemence* spoke to (<http://www.ieso.ca/Documents/training/QT-Automatic-Voltage-Control.pdf>)
- If participants need clarification of applicability of standards, the clarification can be included in document.

*R. Falsetti* asked if the IESO has been audited on the data specifications and *H. Lainis* noted that the IESO has not been audited on them.

*R. Falsetti* indicated that other entities have developed a specific document covering the data specifications. The IESO noted that we do not have one specific document that covers all the needed information.

## 5. Transmission System Code

*L. Reid* provided an update on the Transmission System Code (TSC) project. The TSC has not been updated in about 20 years and TSC did not align with NERC requirements. *L. Reid* noted that the TSC applies to licensed transmitters over 50 kV. *M. Yealland* completed a detailed analysis and the group has put out a notice of proposed amendment. The working group consists of Ovidiu Vasilachi and Steve Burns from IESO, Laurie Reid and Mike Yealland, and Ben Yun from Hydro One. OPG was asked if they want any one on the working group. *D. Kwan* volunteered to be on the working group. *L. Reid* also noted that the Ministry had had a meeting to ensure them that the Board would not take actions that would harm the grid.

## 6. Quick Take - AVC

*R. Clemence* reviewed the quick take - Automatic Voltage Control: Performance and Applicable Reliability Requirements. It lists requirements and methods of achieving success, in other words it provides guidelines or recommendations. The goal of quick take is to list expectations to help Market Participants determine if they are doing enough to meet these requirements. The Control Room at IESO owns these documents. For this quick take, the IESO did something new in that they provided a webinar and went through slide deck, which can be found under Training on the IESO website. The training is a guideline to give information to people and is not enforceable for us, in other words it provides suggestions for participants to implement. He noted that participants may want to consider these methods of procedures because where it is implemented we have seen it works well and where it hasn't, it doesn't work as well. If there are questions, they can be sent to the Customer Relations email.

*R Falsetti* asked if the presentation contains additional information. *R. Clemence* noted that it is basically the same but provides some background information.

*T. Brason* enquired whether there is a plan to have quick takes for a variety of standards. *R. Clemence* stated that at this point there is not a formal plan and that this quick take was developed because we saw events happening.

## **7. Disturbance Monitoring and Reporting Requirements**

*M. Elshnashar* provided an overview of the disturbance monitoring and reporting requirements (PRC-002-2). He noted that the DDR box comes with 12 connections (six are used at high side and six at low side), and three voltage/three current and has high speed and low speed channels.

*M. Elshnashar* noted that the word “including” (on slide 7) is underlined, meaning not limited to the following. In other word, if the Planning Coordinator determines we need more, then we can ask for it.

What’s next includes PMUs, which allow consistent phase angle measurement over a very wide range. The main difference between PMU and DDR is measuring angle (last bullet on slide 14). The challenges are that it is difficult to visualize and manage large amounts of data, the expenses, and the placing of the PMUs.

*D. Kiguel* noted that there is also the NPCC regional standard on disturbance monitoring standards. In retiring the regional standard, there are some elements that were identified that are not in NERC requirements. *H. Lainis* noted that NPCC applies to BPS, NERC applies to BES, so Directory 11 only applies to BPS. *S. Berry* noted that if you a BPS in Ontario, you are BES, by default BPS will have to follow more stringent. *B. Li* noted that they have come up with mapping document which is now currently under review. Also, Directory 11 has not yet been posted, and it will be more important to look at Directory 11 when it comes out.

*G. Bartels* asked when the notifications were sent out and if they did not receive one, can they assume we are not required to do anything. *H. Lainis* stated the letter went to compliance contact by email in June, and if you did not receive one, then you are not required to do anything.

## **8. Standards Enforcement Dates Update**

Since the last RSSC meeting, only three standards were approved: COM-003-1, IRO-018-1, and TPL-007-1.

*H. Lainis* asked members if they want a little more information about each new standard during the quarterly meeting. Members were interested and *H. Lainis* indicated that she will provide more detailed updates at the next meeting, along with providing a roadmap with milestones.

## **9. Current NERC/NPCC/FERC Activities:**

*Ben L.* provided updates on NERC Standard Committee Activities.

- One (1) face to face meeting and one (1) conference call since last reported
- Issues/events of note:

- No. of standards posted is slightly less in Q4 than in previous quarters.
- Still revising Standard Processes Manual, Section 6 (field test), Section 7 (interpretations) and Section 11 (posting reference document).
- Issues: were asked to expand to include guideline documents, they rejected this because the group is for dealing with standards only
- In future, when staff is recommending acceptance or rejection, they will provide supporting rationale when presented to the SC
- *T. Brason* asked about standards that only apply to regional and they how are they handled now. *B. Li* noted that they will still be handled by regional entities.
- Standards Committee Process Subcommittee (SCPS)
  - Completed a review of SAR Form
  - Revised SAR Form to be endorsed at January 18 SC call
- Project Monitoring and Oversight Subcommittee (PMOS)
  - Business as usual
- *B. Li* presented the latest SAR Form which includes:
  - SAR Types has changed from four types to seven types, including Add, Modify, Variance, and Other
  - Justification: identified what was the driver for this
  - Detailed Description
  - Cost Impact Assessment: assess the validity of the proposed project
  - Any unique characteristics
  - Alternatives: prompts entities to think of alternatives
- Changes to the Implementation Plan
  - Balloted on Dec 5. The implementation date changed from 12 month to 18 months giving more time to implement. Someone took exception and said this was a material change. *B. Li* noted any material change needs to go through another round of ballot before final ballot.

*Ben L.* provided updates on NERC Standards Development Standards Recently Posted for Comment/Ballot.

- CIP Standards – Supply Chain Management SAR
- Modification to CIP-003-6 (to become CIP-003-7)
  - Original project has two sets of directives
- Emergency Operations – EOP-005, ROP-006 and EOP-008 (all have received approval at final ballots)
- Emergency Operations – EOP-004
  - The IESO had some concerns over the reporting loss of load. The loss of low now needs reporting only if that results from BES Emergency.

*Ben L.* provided updates on NPCC Standards/Criteria Development.

- NPCC Directory #8 – System Restoration: third posting now underway
- *S. Dale* asked if EOP-004 is that Version 3 coming into effect on March 31. *B. Li* stated that EOP-004-4 is a new version and still has to go through the FERC process.

## 10. CIP Update

*D. Dunn* provided an update on the CIP standards. For CIP-003-7, the latest version has been approved and is moving forward. For CIP-003-7 (i) is to make sure they got clarification from the LERC and LEEP world (LERC and LEEP stuff has been dealt with). They now have a draft out for comment and are trying to address issues in the 822 Order to deal with, include the concept of propagation of malware from transient cyber assets and removal media. *D. Dunn* suggests looking at the requirements in the appendix; not only for your assurance but to have assurance from your vendors as well. He noted that removal media is similar in nature, and if you do you allow removal media in the first place, that it is encrypted. In regard to the definitions of transient cyber asset and removal media, they tried to align definitions and requirement language to have plans to cover low, medium and high risk assets.

*D. Dunn* noted that there has been some discussion around requirements coming out of Order 822, such as Exceptional Circumstances. They are looking at the definition of Exceptional Circumstances, and once finalized, then will be able to make determinations of where it is applicable to.

*R. Falsetti* asked if is there any movement on the discussion of streamlining low impact cyber requirements and *D. Dunn* noted that this is on back burner.

For the Supply Chain Management standard, the SAR has been put out and approved. *D. Dunn* noted that Norm Dang from the IESO is on the drafting team and that the team is making progress. He noted that this will be forward looking only and that the industry will not need to retrofit contracts. The challenge the drafting team is having is how to write the standard to provide sufficient flexibility for owner to negotiate contracts. Vendors recognize that this is coming and they are participating in drafting committees. *D. Dunn* discussed the following points regarding the future standard:

- Integrity and authenticity: To make sure any software from vendors hasn't been tampered with or intercepted by the time it leaves vendors hand and gets into yours. In other words, you must be confident you are receiving legitimate code.
- Information System planning and procurement: What do you need to include in your planning, and procurement, and what kind of language do you need to build in your RFPs and vendor contracts. DOE has suggested language to build into contract. There is language from the NIST standard world as well.
- Vendor Risk Management and Vendor Controls: Are vendors making sure their code is secure and well written. How do you get vendor to attest to you that they have the proper controls in place and how does vendor manage the code before and during transit.

*T. Brason* asked for clarification around high, medium, low assets. *D. Dunn* stated that if it's a BES cyber asset, and if doesn't meet high medium criteria, it's a low. He also noted that IESO assessment letter for BES assets should be kept for audit purposes (which is done on an annual basis).

## 11. Other Items

There were no other items presented at the meeting.



## 12. Next Meeting

The 37<sup>th</sup> RSSC meeting (Q2 for 2017) is scheduled for Thursday, April 13, 2017 at 120 Adelaide Street West (downtown Toronto).

No further items were brought up and the meeting ended at 02:00 PM. Motion to adjourn was made by *J. Jayaraman* and *D. Kwan*.