

PROCEDURE



Market Manual 2: Market Administration

**Part 2.16: Ontario
Technical Feasibility
Exception**

Issue 5.0

This procedure provides guidance to TFE applicants on the Ontario-adapted NERC Technical Feasibility Exception process.

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This document may contain a summary of a particular *market rule*. Where provided, the summary has been used because of the length of the *market rule* itself. The reader should be aware, however, that where a *market rule* is applicable, the obligation that needs to be met is as stated in the “*market rules*”. To the extent of any discrepancy or inconsistency between the provisions of a particular *market rule* and the summary, the provision of the *market rule* shall govern.

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1.0	Publication of first release.	July 19, 2010
1.1	Revisions due to process updates	August 14, 2011
1.2	Revisions to include feedback from TFE Applicants	August 24, 2011
2.0	Final Version for Baseline 26.0	September 14, 2011
3.0	Revisions due to process updates.	March 7, 2012
4.0	Revisions due to NERC TFE process updates	June 3, 2015
5.0	Revisions due to NERC TFE process updates	March 2, 2016

Related Documents

Document ID	Document Title
IESO_FORM_1717	NERC Critical Infrastructure Protection Standards -Technical Feasibility Exception Request and Material Change Report Submission Form
IESO_AGR_0023	TFE Cost Recovery Agreement
IESO_PLCY_0014	Reliability Compliance Enforcement Policy

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Table of Changes

Reference (Section and Paragraph)	Description of Change
Entire document	Minor updates throughout the manual to reflect changes in NERC's Rules of Procedure Appendix 4D:
Section 4.7	Clarified the suspension period available to TFE applicants.

– End of Section –

Market Manuals

The *market manuals* consolidate the market procedures and associated forms, standards, and policies that define certain elements relating to the operation of the *IESO-controlled grid*. These procedures provide more detailed descriptions of the requirements for various activities than is specified in the "*market rules*". Where there is a discrepancy between the requirements in a document within a *market manual* and the "*market rules*", the "*market rules*" shall prevail. Standards and policies appended to, or referenced in, these procedures provide a supporting framework.

Market Procedures

The "Market Administration Manual" is Volume 2 of the *market manuals*, where this document forms "Part 2.16: Technical Feasibility Exception".

A list of the other component parts of the "Market Administration Manual" is provided in "Part 2.0: Market Administration Overview", in Section 2, 'About This Manual'.

Structure of Market Procedure

This market procedure is composed of the following sections:

1. **'Introduction'**, which contains general information about the procedure, including an overview, a description of the purpose and scope of the procedure, and information about roles and responsibilities of the parties involved in the TFE process.
2. **'Guide to IESO Portal Collaboration'**, which contains access information to the confidential *TFE* portal collaboration community web site (TFE Portal).
3. **'TFE Cost Recovery Provisions'**, details the costs associated with the application, assessment and maintenance of TFEs.
4. **'Submission and Approval or Disapproval of TFE Applications and Material Change Reports'**, which contains the steps involved in submitting TFE applications, as well as conditions of *TFE* approval or disapproval.
5. **'TFE On-Site Visits'**, which details information for the *TFE applicant* regarding MACD's on-site visits.
6. **'TFE Assessment Report'**, which outlines the requirements of the final TFE assessment report.
7. **'TFE Maintenance'**, which details the steps involved in the ongoing maintenance of *TFE applications*.
- 8.
9. **"TFE Process Diagram"**, which summarizes the *TFE* process in diagram format.
10. **'Appendices'**, which include a list of forms, guidelines, agreements and diagrams related to this procedure.
11. **'References'**, which contains a list of documents related to this procedure.

Conventions

The *market manual* standard conventions are defined in the "Market Manual Overview" document.

– End of Section –

1. Introduction

1.1 Purpose

This document provides the procedure by which a *TFE applicant* may apply for and receive a technical feasibility exception or “*TFE*”. A *TFE* allows for temporary dispensation with *NERC* Critical Infrastructure Protection Standards (“*CIP Standards*”) in accordance with the Procedure for Requesting and Receiving Technical Feasibility Exceptions to *NERC*’s Critical Infrastructure Protection Standards: Appendix 4D to the Rules of Procedure (“*NERC TFE Process*”).¹

1.2 Scope

This procedure is intended to provide *TFE applicants* with a summary of the steps and interfaces involved in the *TFE* process.

The steps described in this document serve as a roadmap for *TFE applicants* and reflect the requirements set out in section 3.2A of Chapter 5 of the *market rules* and applicable *IESO* policies and standards.

1.3 Process Overview

NERC’s *CIP Standards* specify mandatory requirements for the protection of Covered Assets² associated with bulk electric system assets that have been classified as “critical”. Critical assets are those which, if destroyed, degraded or otherwise made unavailable, would affect the reliability or operability of the bulk electric system.

In Ontario, the *IESO* developed criteria to identify critical assets in consultation with the stakeholder-represented Emergency Preparedness Task Force, which includes key *market participants* and government representatives. Affected *market participants*, owning critical assets were informed by the *IESO* and required to identify those covered assets associated with the critical asset.

Market participants that own critical assets identified by the *IESO* have the ability to apply for exceptions to *CIP Standards* for equipment that is unable to meet the mandatory requirements for reasons specified in *NERC*’s “Procedure for Requesting and Receiving Technical Feasibility Exceptions to *NERC* Critical Infrastructure Protection Standards” (the “*NERC TFE Process*”) as approval criteria.

An approved *TFE* does not exempt the *TFE applicant* from compliance with the requirement; it only grants temporary relief from compliance with the requirement. A *TFE application* must therefore

¹ See Appendix 4D to *NERC*’s Rules of Procedure on the *TFE* process . For the purposes of this procedure, the Appendix 4D to *NERC*’s Rules of Procedure are referred to as “*NERC TFE Process*”.

² A “Covered Asset” is a BES Cyber Asset, BES Cyber System, Protected Cyber Asset, Electronic Access Control or Monitoring System, or Physical Access Control System that is subject to an Applicable Requirement, or part thereof.

contain a timeline for eliminating the dependency on a *TFE* and the execution of compensating and/or mitigation measures, that achieve at least a comparable level of security that would have been provided by strict compliance, during the period in which a *TFE* is in effect.

1.4 Document Interpretation Overview

The *IESO* has adopted the *NERC* approved *TFE* process with minor amendments to make it applicable in Ontario. This document describes the *TFE* process in Ontario and clarifies any differences from the *NERC TFE* Process. Should any conflicts exist between this document and the *NERC TFE* Process, this document shall take precedence.

1.5 Definitions

The terms used in this document are to be understood as having the same meaning as the terms used in section 2.0 of the *NERC TFE* Process, unless otherwise noted herein.

The term “*TFE* Request” defined in the *NERC TFE* Process shall have the same meaning as the term “*TFE* application” used in the Ontario *TFE* process and defined by the *market rules*.

1.6 Roles, Responsibilities and Obligations

The role of the *IESO*, the Market Assessment and Compliance Division (“*MACD*”) and *TFE* applicants as they relate to the *TFE* process, is outlined below.

1.6.1 Role of the *IESO*

The *Electricity Act, 1998* (Ontario)³ empowers the *IESO* to make and enforce rules for the Ontario electricity market. Reliability standards have effect in Ontario through these market rules. As such, a violation of a reliability standard is seen in Ontario as a breach of Ontario’s market rules, and accordingly, is subject to enforcement processes and sanctions contained within those rules⁴.

In accordance with the *market rules*, section 3.2A, Chapter 5, the *IESO* has the authority to process a *TFE* application in accordance with the Ontario-adapted *NERC* procedures for processing *TFE* applications as set out in the applicable market manual. The *IESO*, through OEB licensing obligations, is accountable for complying with all applicable reliability standards and criteria.

1.6.2 Obligations of Market Assessment and Compliance Division

Through delegated authority from the *IESO*’s CEO, *MACD* is responsible for monitoring and enforcing compliance with all market rules and reliability standards.

Given this framework, *MACD* is responsible for reviewing and approving *TFE* applications and Material Change Reports (MCR) in Ontario and enforcing any breaches of CIP Standards.

As the lead business unit in the *TFE* assessment process, *MACD*:

³ See the *Electricity Act, 1998* (Ontario).

⁴ See Market Rules, Chapter 3, Section 6.

- executes all aspects of *TFE* and MCR assessments, including CIP compliance analysis of the requirements that are the subject of the *TFE applications*, evaluation of approval criteria and adequacy of mitigations and compensating measures, approvals, disapprovals, amendments, terminations, transfers, terms and conditions, including mitigation and compliance plans;
- establishes the scope of all *TFE* assessments;
- establishes all terms and conditions of *TFE* maintenance;
- makes decisions regarding the interpretation of CIP requirements;
- administers the *TFE* budget tracking and cost recovery process;
- provides a single point of contact to the applicant for the *TFE* process;
- coordinates site visits, as required;
- drafts and delivers the presentation at site visits, as required;
- produces the *TFE* assessment report to be reviewed by the *TFE applicant*
- amends or terminates an approved TFE in whole or in part (on its own initiative).

In executing these responsibilities, MACD:

- may utilize the services of other *IESO* staff outside of MACD;
- may seek input, advice, or support from *NPCC* or *NERC*, whenever required;
- may use the recommendations of consulting services (if required) outside MACD to inform its decisions to either approve or disapprove *TFE applications* or **Material Change Reports**; and
- shall ensure that non-disclosure agreements (“NDAs”) are signed by external parties and retained for *TFE* evaluation and approval processes.

To avoid possible conflict of interest, MACD will not use *IESO* staff to either screen *TFE applications* or **Material Change Reports** submitted by the *IESO* or to recommend a course of action for the applications submitted by the *IESO*. Apart from *TFE applications* or **Material Change Reports** submitted by the *IESO*, on a case-by-case basis, if MACD assesses actual or perceived conflict of interest concerning any MACD review team member, it will be identified to the *TFE applicant* prior to the commencement of the *TFE* or **Material Change Report** assessment process, and comments on the conflict will be requested from the *applicant*. MACD will consider the *applicant’s* comments and communicate its determination to the *applicant*.

1.6.3 Role of the TFE Applicant

The circumstances under which a *TFE applicant* may apply and obtain approval for a *TFE application* or **Material Change Report** are outlined in the *NERC TFE Process*.

The responsibility for applying, substantiating, obtaining approval, and maintaining approval of a *TFE* or a **Material Change Report** is borne by the *TFE applicant*. The cost of processing a *TFE application*, subsequent Material Change Reports and any process costs associated with a *TFE application* are borne by the *TFE applicant*, as specified in Chapter 5, section 3.2 A of the Ontario market rules.

In the event of a Material Change to the facts underlying an approved TFE, the *TFE applicant* shall submit a **Material Change Report** or “MCR” providing continuing justification for the TFE or verifying that **Strict Compliance** with the **Applicable Requirement** has been achieved.

1.7 Confidentiality of TFE Applications and Related Information

This section corresponds with the *NERC TFE* Process section entitled: “Confidentiality of *TFE* Requests and Related Information”, but has been adapted for application in Ontario.

Any technical material received or produced by the *IESO* surrounding a *TFE application* will be maintained as confidential in accordance with the confidentiality requirements as outlined in Chapter 3, section 5 of the *market rules*. Any finance, contract or other administrative information regarding the *TFE* process will be managed by *IESO* staff with the same level of consideration to confidentiality.

1.8 Contact Information

Initial queries, questions or concerns regarding the Ontario-adapted *TFE* process should be directed to customer.relations@ieso.ca. Once the *TFE* process has been initiated, all subsequent correspondence will occur with MACD through the procedure outlined in this document.

– End of Section –

2. Guide to IESO Portal Collaboration

2.1 Introduction

The *NERC* CIP Technical Feasibility Exceptions portal collaboration community (“portal”) is used to exchange and share confidential information and documents between *TFE applicants* and *MACD*.

The responsibility for applying for a *TFE* is borne by the *TFE applicant*. Once the *TFE applicant* has notified *MACD* that they intend to apply for a *TFE(s)*, the process of registering the *TFE applicant* on the portal begins.

This section outlines specific information on functionality within the *applicant’s TFE* portal collaboration community. General information on the portal, including logging on and navigating, is available in the [Guide to IESO Portal Collaboration](#).

MACD will notify the *TFE applicant* once their portal access has been established and will indicate to them their username and password needed to access the portal. For assistance with user ID and passwords, please contact *MACD* at macd.tfe@ieso.ca.

Note: Not all users may see or have the permissions to perform all functionality described within this guide.

For details on how to access the portal, overview of the portal and how to view documents from the portal please see Appendix B.

– End of Section –

3. TFE Cost Recovery Provisions

3.1 TFE Cost Recovery Agreement

Prior to the commencement of the *TFE application*, the *TFE applicant* is required to submit an executed *TFE Cost Recovery Agreement* (“*Agreement*”) in which the *TFE applicant* agrees to compensate the *IESO* for all reasonable costs incurred by the *IESO* in processing the *TFE application* and subsequent *Material Change Reports*, and maintaining an approved *TFE* until such time as the *TFE* is no longer in effect. These costs may include, but are not limited to:

- costs and expenses incurred by the *IESO* relating to consultations with *NPCC* or *NERC* in its assessment of a *TFE application* or *Material Change Report*;
- costs and expenses of *IESO* staff or a third party contracted by the *IESO* to conduct a review of a *TFE application* or *Material Change Report*; and
- costs and expenses of *IESO* staff or a third party contracted by the *IESO* for travelling to the *TFE applicant’s* premises to conduct physical inspections of the applicable cyber assets or review additional information that the *TFE applicant* is unable to provide off-site.

Once the agreement has been reviewed and agreed to by both the *IESO* and the *TFE applicant*, the agreement is signed by the *IESO*. The contract becomes effective as of the date the agreement is counter-signed by the *TFE applicant*.

3.2 Initial Deposit for TFE Applications

A *TFE applicant* is required to submit to the *IESO*, along with its *TFE application* a payment in the amount of \$Cdn 5,000 (plus HST). This Initial Deposit is based on an estimate of all reasonable costs that will be incurred by the *IESO*, on average, in processing a *TFE application* and its subsequent *Material Change Reports*, and maintaining an approved *TFE* until such time as the *TFE* is no longer in effect. Additional invoices will be issued to the *TFE applicant* if the *IESO* determines that the Initial Deposit is not sufficient to compensate for the actual costs incurred or to be incurred by the *IESO* in processing a *TFE application* and maintaining an approved *TFE* until such time as the *TFE* is no longer in effect.

The *TFE applicant* is given thirty (30) days to pay the invoice, from the invoice date.

NOTE: If the invoice is not paid in time, the Supervisor Reliability Standards Investigations and Audits (RSIA) will notify the *TFE applicant* that MACD will not commence or will cease any work related to the *TFE* in question until the invoice payment is received in full by a specified deadline and that not meeting the deadline will result in a referral of the matter for possible enforcement actions. The applicant is still responsible for payment of any process costs from the time of the initial application, regardless of whether the process ends at this point.

If the payment is not received by one month after the specified deadline in the letter from the Supervisor RSIA, MACD will issue a notice disapproving the *TFE application* and notify the *TFE applicant* that a non-compliance referral was submitted to MACD’s enforcement group.

3.3 Maintenance Costs

In accordance with section 3.2A.10 of the *IESO* market rules, the *IESO* may periodically invoice a *TFE applicant* for the costs and expenses for maintaining the approved *TFE* until such a time as the *TFE* is no longer in effect, less the amount of any deposit paid under this procedure. The *TFE applicant* has 30 days from the invoice date to pay the *IESO* the full amount owing on the invoice.

3.4 Cost Threshold

For each *TFE application*, the *IESO* will establish a cost threshold or subsequent cost thresholds which it considers to be reasonable and which will form part of the executed TFE Cost Recovery Agreement. The *IESO* will monitor expenditures against the cost threshold of a *TFE application* and where that threshold is reached, the *IESO* will:

- advise the *TFE applicant* of the work and costs incurred to date; and
- provide an estimate to the *TFE applicant* of the further work and costs necessary to complete the assessment of the *TFE application*.

An estimate of the further costs necessary to complete the assessment of the *TFE application* will form an addendum to the original executed agreement.

The *TFE applicant* may choose to continue with the assessment of the *TFE application* or discontinue the assessment of the *TFE application* by withdrawing the *TFE application*. In the event that the *TFE applicant* chooses to discontinue the assessment by withdrawing the *TFE application*, the *IESO* will issue an *invoice* to the *TFE applicant* for all reasonable costs incurred by the *IESO* to that point. Since the *TFE applicant* does not meet the conditions for **Strict Compliance** with the **Applicable Requirements**, the MACD review team will refer the matter to MACD investigations for possible enforcement actions.

The *IESO* will issue an *invoice* to the *TFE applicant* upon completion of the processing of the *TFE application* in an amount equal to all of the *IESO*'s costs and expenses relating to the processing of the *TFE application* less the amount of any deposit paid by the *TFE applicant*.

A *TFE applicant* is required to pay the *IESO* the amount owing within thirty (30) days of the *invoice* date.

– End of Section –

4. Submission and Approval or Disapproval of TFE Applications and Material Change Reports

The following sections outline the form, content and submission requirements for a *TFE* application.

4.1 Submission of a TFE Application or Material Change Report

The *TFE applicant* notifies MACD at macd.tfe@ieso.ca that they intend to apply for a *TFE(s)*. MACD then directs the *applicant* to the TFE forms, which are either obtained from the IESO website or by contacting MACD at macd.tfe@ieso.ca (see Appendix A).

The *TFE applicant* provides MACD with appropriate contact information to set-up/verify its access to the *TFE* portal collaboration community (see Section 2). *TFE applications* are submitted by the *TFE applicant* separately for each *TFE* via the *TFE* portal collaboration community. An email is sent by the *applicant* to macd.tfe@ieso.ca notifying MACD that a submission has been made through the portal.

A *TFE application* must be submitted by the *TFE applicant* through the *TFE* portal collaboration community⁵ for each Applicable Requirement⁶ pertaining to each Covered Asset. *TFE applications* for certain Covered Assets may be grouped together to allow for the assessment of multiple, similar Covered Assets. MACD will determine, in its sole discretion, whether *TFE applications* for similar Covered Assets may be grouped together for assessment and/or cost recovery purposes based on factors including whether:

- the *TFE applications* are made on the same basis for approval;
- the Covered Assets have the same compensating/mitigating measures; and
- the Covered Assets have the same proposed expiration dates.

Where multiple bases for approval, different mitigation measures for varying asset types or different paths to achieve compliance are provided, MACD may require the *TFE applicants* to re-group or split the original *TFE applications* such that these *TFE applications* are unique in terms of their rationale, mitigation path and path to achieve strict compliance, thereby simplifying the tracking of each *TFE application* to ensure clear, effective assessment and resolution.

During the process, MACD will advise as to whether particular *TFE applications* can be grouped together for assessment and/or cost recovery purposes. Furthermore, MACD may elect to change groupings at any stage of the process if it determines that the groupings are no longer appropriate.

⁵ The process for submitting a *TFE application* through the *TFE* portal collaboration community is outlined in Section 2 of this procedure.

⁶ An “Applicable Requirement” is a requirement, or a part thereof, of a CIP Standard that expressly provides either (i) that compliance with the terms of the requirement are needed where technically feasible, or (ii) that technical limitations may preclude compliance with the terms of the requirement.

The *TFE applicant* shall submit a **Material Change Report** for review and approval by MACD when there has been a material change in the facts underlying an approved *TFE application*. A MCR may be filed for an increase (but not a decrease) in device count, a change in compensating/mitigating measures, replacement of a device, change in statement of basis for approval for the *TFE application*, a change in expiration date of the *TFE application* or when the *TFE applicant* has achieved strict compliance with the applicable requirement.

Removal of a device by a *TFE applicant* does not require the filing of a MCR, but the *TFE applicant* shall inform MACD about the change, because MACD must maintain a record of all such asset count changes for reporting to NERC and NPCC.

Upon receipt of a *TFE application* or **Material Change Report**, MACD will assign a unique identifier to the *TFE application* or Material Change Report.

The *TFE applicant* may amend a *TFE application* or **Material Change Report** that is under review by MACD. In that case, MACD may, at its own discretion, revise the schedule for reviewing the application, but the amendment request does not require the restart of the approval process.

4.2 Content of a TFE Application or Material Change Report

Information requirements for both *TFE application* and Material Change Report are outlined in the *NERC TFE Process*. These requirements apply to the Ontario-adapted *TFE application* process, unless expressly modified in this document.

A *TFE application* or **Material Change Report** shall include, as applicable, the following information⁷:

1. *Market Participant* Information
 - a. *Market participant* name
 - b. *Market participant* ID
 - c. *Market participant's* designated *TFE* Contact information
2. *TFE* Parameters
 - a. **Applicable Requirement**
 - b. Number of **Covered Assets** and their location
 - c. Categorization of **Covered Assets**
 - d. **Covered Asset's** ID and in service date
 - e. Is the *TFE* related to a previously submitted self-certification or self-report?
 - f. Was the *TFE* previously approved?
 - g. *TFE* ID
3. *TFE* Justification

⁷ See section 4.2 of the *NERC TFE Process*

- a. Basis for approval
 - b. Justification and substantiation of applications for *TFE* without ***Expiration Date***
4. Compensating and Mitigating Measures
- a. Description of proposed compensating and mitigating measures
 - b. Timetable for implementing the proposed compensating and mitigating measures
5. *TFE* Termination
- a. Proposed ***Expiration Date***
 - b. Actual ***Expiration Date***
 - c. Timetable to achieve ***Strict Compliance*** and terminate the *TFE*

In addition to this information, the *TFE applicant* must also provide:

- documents, drawings and other information necessary to substantiate the *TFE application* or ***Material Change Report***; and
- a statement signed and dated by the *TFE applicant's* senior manager or delegate approving the content of the *TFE application* or ***Material Change Report***.

Unless prohibited by law (see section 5.2 below), *TFE applicants* shall provide MACD with access to the information, including confidential information, included or referenced to in the *TFE application* or ***Material Change Report*** and with access to the ***Covered Asset(s)*** and any related facilities for purposes of making a physical review or inspection as described in section 5 of this document. This information must be available for review by MACD from the date the *TFE application* or ***Material Change Report*** is submitted.

The TFE Request or Material Change Report must contain all the necessary information as specified in the *NERC TFE Process*. A template for TFE Request or Material Change Report submissions is offered as a guide in Appendix A.

4.4 Review of TFE Application or Material Change Report

Once the *applicant* has uploaded their *TFE application* or ***Material Change Report*** into the portal, the review process begins.

The objective of the MACD review is to determine whether the *TFE application* or ***Material Change Report*** will be approved or disapproved. This assessment involves a review of the *TFE applicant's* submissions to determine whether the *TFE applicant* has substantiated the approval criteria⁸ and whether the mitigations and compensating measures achieve at least a comparable level of security for the Bulk Electric System as would ***Strict Compliance*** with the ***Applicable Requirement***. In reviewing a Material Change Report, MACD will confirm that:

- The MCR has been submitted within sixty (60) days of identification or discovery of the Material Change, and

⁸ The approval criteria are those outlined in section 3.1 of the *NERC TFE Process*.

- The MCR includes information supporting the continuing need and justification for the approved *TFE application* or verifying that they have achieved strict compliance with the applicable requirement.

The *TFE* and Material Change Request review process is intended to be a collaborative exchange of information between the *TFE applicant* and MACD to maximize the chances that the *TFE application* or **Material Change Report** is approved. MACD's assessment is neither a full nor a partial audit of the *TFE applicant's* compliance with NERC CIP standard and hence it is, generally limited in scope, focusing only on the information relevant to the assessment of the *TFE application* or **Material Change Report**. Notwithstanding, MACD may be required to expand their review beyond the **Applicable Requirements** when the compensating and/or mitigating measures offered involve CIP requirements that are not the subject of the *TFE application*.

Should this occur, the MACD review team may comment on the *TFE applicant's* compliance with NERC CIP standards and if the MACD review team suspects a possible breach of a CIP standard, it will advise the *TFE applicant* and refer the matter to MACD investigative staff for follow-up. In either case, any compliance opinions or advice given by the MACD review team to the *TFE applicant* is non-binding on the final decision made by MACD regarding the approval or disapproval of the *TFE application* or **Material Change Report**, or on any of MACD's future enforcement decisions involving the *TFE applicant*.⁹

The review of a *TFE application* or **Material Change Report** may involve one or more conference calls and/or face-to-face meetings with the *TFE applicant* to understand their submissions, request additional information, schedule on-site meetings or physical inspections of the **Covered Asset(s)** and related facilities, or provide the *TFE applicant* with recommendations regarding possible revisions to the *TFE application* or **Material Change Report**.

These suggestions by the MACD review team are non-binding on the decision of MACD to approve or disapprove the TFE application or **Material Change Report**.

If MACD determines that an on-site visit is warranted as part of the *TFE* or Material Change Request review process, a request is made to the *TFE applicant*. This contrasts with NERC who plan to view on-site information during routine spot-checks or audits-

4.5 Review of TFE Compensating/Mitigation Measures

In general, the submission of a *TFE application* or **Material Change Report** requires that the *TFE applicant* provide a set of compensating and/or mitigating measures that offset, by an equal amount, the risk created by the lack of **Strict Compliance**. These controls typically use a different set of technical and/or procedural protective measures from those specified in the original NERC CIP requirement.

⁹ Additional information may be requested by MACD to assist both in understanding the nature of the *applicant's* system and to assist in making an informed judgment on the *TFE*. This ultimately enables a collaborative exchange of information between both parties.

In order to assess the strength of the *TFE applicant's* compensating and/or mitigation measures, the MACD review team will ask the *TFE applicant* to provide information which fully supports an understanding of these measures.

For example, an explanation of the network architecture and the cyber assets included within the Electronic Security Perimeter (ESPs) that the *TFE applicant* has defined may be required. If further clarity is needed, the *TFE applicant* may be asked to explain how each access point to the ESP(s) has been defined and protected. This information may include architecture diagrams, network drawings showing ESPs and PSPs, device and product specifications and configurations, firewall rules, project plans and schedules for the implementation of mitigating measures, etc.

In some cases, for confidentiality reasons, the *TFE applicant* may not wish to allow some or all of this information to leave their premises. In such cases, one or more site visits may be conducted by the MACD review team to review and assess this confidential information as part of an open and collaborative dialogue with the *TFE applicant*.

As an example, if the applicant seeks exception, on technical infeasibility grounds, from the malware protection requirements applicable to a Critical Cyber Asset within an ESP, then some or all of the following areas of exploration by the MACD review team would be pertinent in assessing the adequacy of the mitigation plans, if offered as mitigating or compensating measures:

- the construction of the ESP and the controls for each of its access points;
- the strength of the firewall rules for a firewall protecting the ESP, and the possible use of an intrusion detection/prevention module or malware prevention module built into the firewall;
- the restrictions placed on the remote management of a firewall protecting the ESP;
- the strength of the physical protective measures used to secure the PSP, and, by extension, the ESP and its resident cyber devices;
- the ability for devices within an ESP to alert for the presence of cyber security events;
- the use of host or network-based intrusion detection and prevention devices, and the frequency of signature update for these devices;
- the use of malware prevention software on other devices within the ESP, and the frequency of signature update for this software;
- the patch management process and timelines;
- the integrity measures employed by the device that is the subject of the TFE application, where the integrity measures may include vendor signing of implemented code, regular comparison of running code, application white-listing, etc.;
- the process for testing and updating new code for the cyber devices within the ESP as part of a Change and Configuration Management Program;
- the use of hardware port restrictions on network switches within the ESP so as to reduce the possibility of inadvertently introducing infected devices into the network within the ESP;
- the procedural and technical restrictions imposed regarding the use of removable memory type devices within the ESP as they could be the source of malware infections;
- the robustness of the response and recovery processes articulated by the *TFE applicant* should there be a need to address an actual malware intrusion; and
- the comprehensiveness of the training provided by the *TFE applicant* to responsible staff surrounding the protection of critical cyber assets.

MACD will also assess the effectiveness and timeliness of the compensation/mitigations and/or compliance plans provided by the *TFE applicant*.

4.6 Approval/Disapproval

Upon completion of its review, MACD shall either approve or disapprove the *TFE application* or **Material Change Report** in whole or in part, even if the *TFE application* or **Material Change Report** refers to a group of *Covered Assets*.

4.6.1 Required Actions, Terms and Conditions of TFE Approval

To receive approval for a *TFE application*, the applicant must complete the required actions specified by MACD by the dates indicated in the assessment report. Required actions are the mitigations that the *TFE applicant* is required to undertake as a condition of *TFE* approval.

The term of the *TFE* is the duration of its effectiveness and is noted in the assessment report. A *TFE application* may be approved with or without an **Expiration Date**. If the *TFE application* is approved with an **Expiration Date**, the *TFE applicant* is required to implement steps, or conduct research and analysis, towards achieving **Strict Compliance** with the **Applicable Requirements** and eliminating the *TFE* in accordance with the terms and conditions of the approved *TFE*.

If the *TFE* is approved without an **Expiration Date**, the *TFE applicant* is required to monitor the factors underlying the approved *TFE* and, in case of **Material Change**, submit a **Material Change Report** to MACD providing continuing justification for the *TFE* or verifying that **Strict Compliance** with the **Applicable Requirement** has been achieved.

MACD will monitor progress on the required actions through status reports provided by the applicant at the frequency defined in the report. The approval or disapproval of each *TFE application*, and any conditions which the *applicant* is required to maintain an approved *TFE*, are noted in the assessment report (see Section 7.0).

4.7 Enforcement Action for the Period a TFE Application is under Review

This section corresponds with the *NERC TFE* Process section entitled: “No Findings of Violations or Imposition of Penalties for Violations of an Applicable Requirement for the Period a *TFE* Request is Being Reviewed”, but has been adapted for application in Ontario.

Under the *market rules*, Chapter 3, section 6, MACD has discretionary authority to take enforcement actions upon becoming aware of a possible breach of the *market rules*. Unlike the authorities granted to *NERC*, which guarantees that penalties and findings of a breach will not occur during the period of *TFE application* review, MACD has not been granted such authority under the *market rules*. Instead, the Ontario-adapted process provides *TFE applicants* a “suspension period” where MACD will not initiate enforcement actions for non-compliance with CIP standards during the period of application review. Note that MACD has the discretion to terminate the suspension period and initiate compliance enforcement actions for the entire *TFE application* review period (from the date an

application is submitted to the Effective Date¹⁰) where it disapproves a *TFE application* for the following reasons:

- MACD finds a *TFE applicant* has breached section 11.2.1 or 11.3.1 of Chapter 1 of the *market rules*; or
- any *TFE application* information requirements are not satisfied within the MACD-specified timeframe.

Subject to the foregoing paragraphs, the suspension periods described below are available to *TFE applicants*. MACD will not initiate compliance enforcement actions for the period from:

- (i) the date that the *TFE application* is submitted to MACD,
to:
- (ii) (a) the date that the *TFE application* is approved, or (b) the Effective Date that the *TFE application* is disapproved, whichever is applicable.

– End of Section –

¹⁰ The “TFE Effective Date” as defined in the *NERC TFE Process*, is “the date, as specified in a notice disapproving a *TFE Request* or terminating an approved *TFE*, on which the disapproval or termination becomes effective”.

5. TFE On-Site Visits

5.1 Purpose of On-Site Visits

TFE on-site facility visits are conducted to allow for a collaborative exchange of information between MACD and the *TFE applicant* in order to maximize the approval chances of the *TFE application* and the Material Change Report.

On-site visits allow for viewings, demonstrations and physical inspections of the **Covered Assets** helping MACD develop an understanding of the nature and context of the *TFE application* or **Material Change Report**. In addition, on-site visits allow for the inspection of confidential information which is not permitted to leave the *TFE applicant's* site.

Subsequent to a *TFE* approval, or as part of the termination or amendment process, on-site visits may be required to validate the implementation of the compliance and/or mitigation plan.

5.2 Access to Confidential Information

Upon reasonable advance notice from MACD and unless prohibited by law, the *TFE applicant* shall provide MACD with access to confidential information included or referenced to in the *TFE application* or **Material Change Report** and with access to the **Covered Asset(s)** and any related facilities for purposes of making a physical review or inspection as described in this document.

If a *TFE applicant* is prohibited by law from disclosing any confidential information to any person who is not an **Eligible Reviewer**¹¹, then such information will only be reviewed by a representative of MACD who is an **Eligible Reviewer**.

MACD and a *TFE applicant* will work cooperatively such that MACD receives access to confidential or protected information¹² in a way that does not waive or extinguish the exemption of the confidential or protected information from disclosure.

5.3 On-Site Visit Rules of Engagement

MACD and the *TFE applicant* will work together to establish a time and date for any on-site visit(s). Prior to the commencement of the site visit, a number of issues are addressed:

- all members of the MACD review team sign the *IESO Code of Conduct* which requires that they adhere to the market rules with respect to the treatment of confidential information.

¹¹ A person who has the required security clearances or other qualifications, or who otherwise meets the applicable criteria, to have access to confidential information, or information protected under "Ontario's Freedom of Information and Protection of Privacy Act ("FIPPA"), as applicable to the particular information to be reviewed.

¹² Information protected under FIPPA.

- the *TFE applicant* produces for the MACD review team two hard copies of confidential information which cannot be removed from the site;
- all *TFE* material produced as a result of the assessment is to be marked as “confidential” by the *TFE applicant*.
- All members of the MACD review team shall follow the *TFE applicant’s* safety and security procedures to ensure the safety of all persons and to protect the integrity of the *TFE applicant’s* assets.

The MACD review team reviews the documents provided and may request additional supporting information or clarification, as required.

During the site visit, MACD makes an applicant-specific presentation outlining objectives, process, data, evidence retention and requirements for the final assessment report. The presentation is sent to the applicant via email approximately one week in advance, thereby allowing the applicant enough time to organize its staff and any security requirements associated with the site visit.

Upon completion of MACD’s presentation, the *TFE applicant* delivers a brief presentation describing the company’s organizational structure and computer systems as relevant to the *TFE application*.

If necessary, MACD may request to view/inspect the facilities that are part of the *TFE application* or **Material Change Report**. The inspection would enable the MACD review team to view the *TFE applicant’s* basic network architecture and cyber assets within the Electronic Security Perimeter (ESP), review the ESP drawings and conduct an inspection of the Physical Security Perimeter (“PSP”). As part of this process, MACD will review:

- how each access point to the ESPs has been defined and protected;
- network architecture diagrams;
- network drawings and layouts showing ESP perimeters;
- device and product specifications and configurations;
- firewall rules; and
- project plans and schedules for the implementation of mitigating measures or compliance plans.

Following the inspection of the facility, the MACD review team may suggest to the *TFE applicant* avenues of research to substantiate the approval criteria, discuss the strength of the compensating and/or mitigating measures and make suggestions regarding implementation plans. MACD may also identify actions and/or evidence necessary to maximize the approval chances of the *TFE application* and the Material Change Report.

In general, the submission of a *TFE application* will require that the *TFE applicant* propose a mitigation plan which achieves an equivalent level of protection that would have been provided by **Strict Compliance**. This mitigation plan typically uses a different set of technical and/or procedural protective measures from those specified in the original *NERC CIP* requirement.

5.4 TFE Data and Evidence Retention

At the conclusion of the site visit(s), the *TFE applicant* is required to ensure that all sensitive information (electronic, hard copy or otherwise) provided to support the *TFE application* is properly marked with the appropriate confidentiality classification. Note that where possible, information provided by the applicant should be in electronic format. In addition, the applicant must ensure that a copy of all electronic evidence provided to support the *TFE* request is uploaded to a single, secure, encrypted, password protected flash drive at the end of the site visit.

The *TFE applicant* will be asked to seal in a Tyvek envelope a single copy of all hard copy and electronic *TFE* assessment information which, due to its confidential nature, cannot leave the premises of the *TFE applicant*. The seal is signed by the MACD review team leader as well as the designated *TFE applicant's* designated authorized representative. The envelope shall be appropriately dated and labelled. The sealed evidence is retained in a way that allows it to be preserved as it existed at the time of the *TFE* assessment. The envelope with the sealed information is kept secure at the *applicant's* premises for a minimum of seven (7) years past the date of expiry of the *TFE*.

5.5 On-Site Exit Presentation

Once the applicable evidence is secured and sealed, the MACD review team conducts an exit presentation that explains to the *TFE applicant* the next steps in the *TFE* process, including:

- content and timelines of the *TFE* assessment report;
- verification of “required actions” agreed to by *TFE applicant*;
- timing of formal notification of approvals and disapprovals;
- ongoing *TFE* reporting requirements, if applicable; and
- *TFE* maintenance requirements including revisions, terminations, amendments and new submissions.

– End of Section –

6. TFE Assessment Report

6.1 TFE Assessment Report

Through the *TFE* review process, MACD will identify those aspects of the *TFE application* that require certain actions for approval. Prior to the final approval/disapproval, MACD will provide the *TFE applicant* with a preliminary assessment report outlining any required actions to approve the *TFE application*¹³. The assessment report contains preliminary *TFE application* decisions by MACD and includes the following information:

- preliminary decisions regarding the approval/disapproval of each *TFE application*;
- an assessment of whether the *applicant* has substantiated the approval criteria for each *TFE application*;
- an assessment of whether the *TFE applicant's* mitigating and/or compensating measures offsets by an equal amount the risk created by its non-compliance with the ***Applicable Requirements***;
- an assessment of the reasonability in the timing and manner by which the *applicant* will achieve ***Strict Compliance*** with the ***Applicable Requirement***;
- the outstanding list of actions (which may include options) which the *applicant* is required to undertake in order to obtain an approval for a *TFE application* that has been preliminarily disapproved;
- the milestones the *applicant* is required to achieve with respect to the implementation of mitigating measures;
- the steps in achieving ***Strict Compliance*** in order to maintain *TFE* approval;
- reporting to MACD that may be required regarding the implementation of mitigation plans and/or plans to achieve Strict Compliance, as well as any research required to be conducted; and
- a list of information that was sealed at the applicant's site during the on-site visit.

Prior to a final decision being made by MACD, the *TFE applicant* is required to respond to the preliminary *TFE* assessment report by verifying:

1. the validity, accuracy and completeness of the technical information in the report;

¹³ The accuracy of these assessment reports is based solely on the information provided by the applicant with respect to the configuration of their cyber assets and the information collected by the *TFE* assessment staff during the substantive review. Should MACD determine that the information used to form the basis of *TFE* approval or disapproval is in fact incorrect, inaccurate, invalid, or incomplete, and had a material effect on the *TFE's* approval or disapproval, MACD may amend or terminate the approved or disapproved *TFE*. In addition, MACD may initiate compliance actions as a result of a termination or amendment to a *TFE*.

2. any changes from the original *TFE application*;¹⁴
3. that the report accurately reflects those compensating and/or mitigating measures or compliance plans the applicant has voluntarily undertaken or will undertake; and
4. the applicant's agreement to the terms, conditions and required actions identified in the report for each *TFE application*. For applications where disapproval is recommended, the applicant must confirm whether they will complete the required actions by the time specified in the report.

Following consideration of the written submission, MACD will issue to the applicant the final *TFE* assessment report containing MACD's final determinations and the *TFE applicant's* agreed-to terms, conditions and required actions for *TFE* approval. This is not an opportunity for the applicant to raise disputes regarding the report determinations unless they are affected by factual inaccuracies or omissions. Any failure to fulfill the agreed-to terms, conditions and required actions will trigger a reconsideration of the approved *TFE* and may result in:

1. an amendment or termination to the approved *TFE*, and/or;
2. the initiation of a compliance investigation and enforcement action, as the case may be.

– End of Section –

¹⁴ It is expected that during the course of the *TFE* process, changes from the original submissions may have occurred regarding the equipment applied for, mitigation/compensating measures or mitigation/compliance plans and schedules or otherwise. Such changes need to be cited in the written submission to MACD.

7. TFE Maintenance

In order to maintain approval once granted, the applicant is required to comply with the terms and conditions of the approved *TFE*. Any failure to comply with these conditions, including the reporting requirements, could result in either a termination or amendment to the *TFE*. In addition, MACD may initiate compliance actions as a result of a failure to comply with these stated conditions of the *FTE*.

Once the *applicant* can confirm that ***Strict Compliance*** has been achieved for equipment covered by an approved *TFE*, the applicant is required to notify MACD. Strict compliance can be verified by either submission of supporting documentation or by an on-site visit in which a visual inspection and/or testing of the equipment is performed.

7.1 Reporting and Periodic Review of Approved TFE

In accordance with section 3.2A.9, Chapter 5 of the *market rules*, all *TFE applications* which have been approved and remain in effect will be subject to reporting requirements and periodic review to verify continuing justification of the *TFE*.

If the *TFE application* was approved with an ***Expiration Date***, the *TFE applicant* is required to implement steps, or conduct research and analysis, towards achieving ***Strict Compliance*** with the ***Applicable Requirements*** and eliminating the *TFE* in accordance with the terms and conditions of the approved *TFE*. For such *TFEs*, applicants may be required to submit regular reports to update MACD on the implementation of these steps, as set forth in the terms and conditions of the approved *TFE*.

Information in this report therefore includes, but is not limited to:

- *TFE* ID number
- ***Applicable Requirement***
- equipment vendor, device and model number
- current quantity of devices covered by the approved *TFE*
- a description of the progress and date for implementing outstanding compensating and/or mitigating measures
- a description of any updates regarding research and/or analysis with vendors for *NERC CIP* compliant solutions
- a description of the progress and date for implementing a compliance plan (if specified as a condition of *TFE* approval)
- a description of any significant work items planned for the next reporting period
- comments regarding overall changes or updated information regarding the *TFE*

Regardless of whether the *TFE* was approved with or without an ***Expiration Date***, the *TFE applicant* is required to monitor the factors underlying the approved *TFE* and, in case of ***Material Change***, submit a ***Material Change Report*** to MACD providing continuing justification for the *TFE* or verifying that ***Strict***

Compliance with the **Applicable Requirement** has been achieved. The Material Change Report shall be submitted to MACD within 60 calendar days of identification or discovery of the Material Change, unless otherwise agreed by MACD.

At the sole discretion of MACD, a periodic review of an approved *TFE* may be conducted following the approval of the *TFE application*. If MACD determines that a site visit is warranted, the periodic review may include visits to the facilities that are the subject of the approved *TFE* to verify, for example, any information submitted to substantiate the original *TFE* or subsequent revisions to this information and the continuing need for the *TFE*. Testing may also be performed during site visits to ensure that the measures implemented by the *TFE applicant* are consistent with the terms and conditions of the approved *TFE* and are effective either as compensating measures or in achieving compliance with the applicable requirement.

7.2 Amendment of an Approved TFE

This section corresponds with the *NERC TFE Process* section entitled: “Amendment of a *TFE Request* or Approved *TFE*”, but has been adapted for application in Ontario.

MACD may amend an approved *TFE* as a result of an incident, spot-check, audit, periodic review, or any other discovery method. In addition, MACD may amend a *TFE* as a result of changes in circumstances from those that existed at the time the *TFE* was approved.

7.3 Termination of an Approved TFE

This section corresponds with the *NERC TFE Process* section 9 entitled: “Termination of an Approved *TFE Request*”, but has been adapted for application in Ontario. An approved *TFE* shall terminate on its expiration date, unless it is terminated at an earlier date as a result of an incident, referral, spot check, audit, periodic review, or any other discovery method. When the *TFE applicant* reports that **Strict Compliance** has been achieved, MACD may choose to verify compliance by any one or more of the following means: requesting supporting documentation, a site visit to perform visual inspection, or testing of the equipment which has achieved strict compliance, as the case may be.

5.5 Transfer of an Approved TFE

The current *NERC TFE Process* does not address the transfer of an approved *TFE*. In contrast, the Ontario-adapted process allows for the transfer of a *TFE* from one corporate entity to another as a result of changes to asset ownership. An abbreviated approval process will be developed for such circumstances with stakeholder involvement at a later date.

7.6 Hearings and Appeal Process for TFE Applicants

This section corresponds with the *NERC TFE Process* section 10 entitled: “Hearings and Appeal Process for Responsible Entity”, but has been adapted for application in Ontario.

A *TFE applicant* whose *TFE application* has been disapproved, or whose approved *TFE* has been terminated, amended, or transfer denied is entitled to the *IESO* dispute resolution process as outlined in the *market rules*. A *TFE applicant* is also entitled to the *IESO* dispute resolution process for any amount invoiced with respect to the cost of a *TFE* assessment.

7.7 Reporting to Standards and Regulatory Authorities

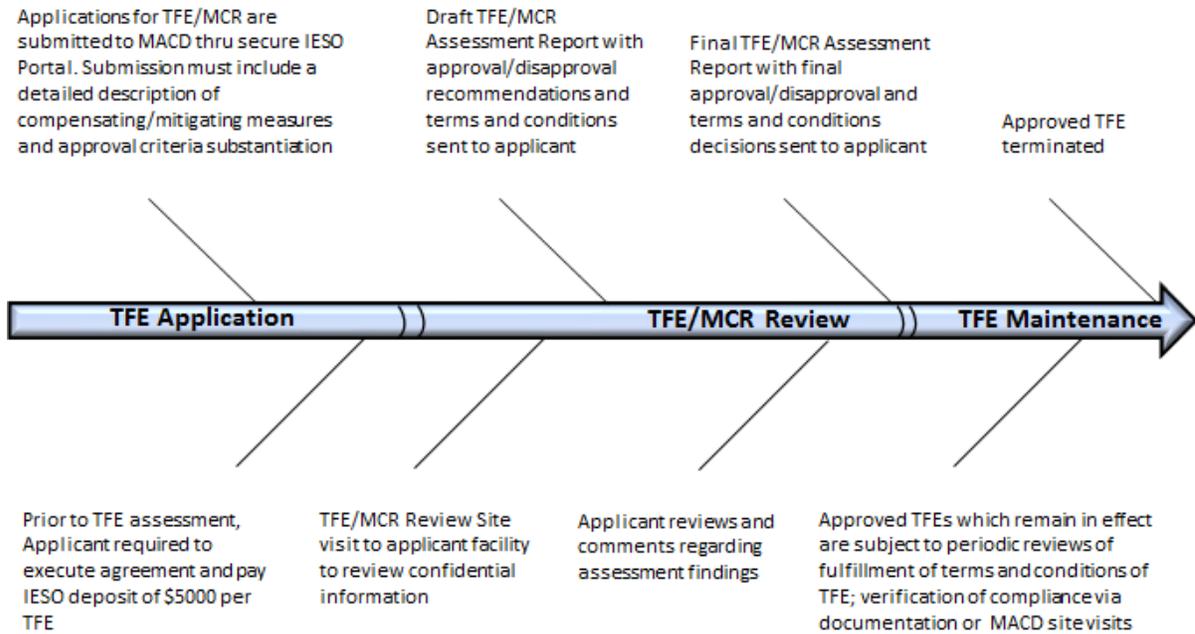
This section corresponds with the *NERC TFE* Process section 13 entitled: “Annual Report to FERC and Other Applicable Governmental Authorities”, but has been adapted for application in Ontario.

The *IESO* will facilitate reporting on Ontario *TFE* status to *standards authorities* including *NERC*, *NPCC* and the provincial regulator, as required. In accordance with the market rules, in reporting to *NERC* and *NPCC*, *MACD* will maintain the confidentiality of *TFE application* data and details provided to the *IESO*.

– End of Section –

Diagram A: Ontario TFE Process

Ontario Technical Feasibility Exception Process



Appendix A: Forms and Agreements

This appendix contains a list of the forms and agreements associated with the *Technical Feasibility Exception* process.

These forms and agreements are available on the *IESO* web site or by contacting MACD at macd.tfe@ieso.ca.

Form or Agreement Name	Form Number
NERC Critical Infrastructure Protection Standards -Technical Feasibility Exception Request and Material Change Report Submission Form	IESO_FORM_1717
TFE Cost Recovery Agreement Template	IESO_AGR_0023

– End of Section –

Appendix B: Forms and Agreements

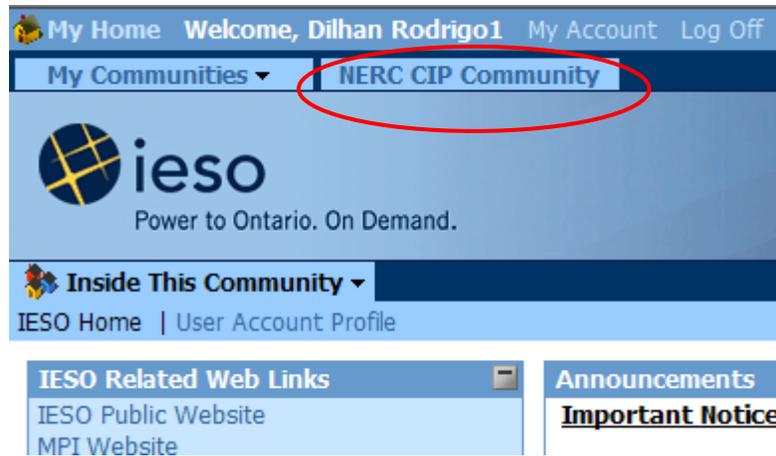
B.1 How to Access Portal Collaboration

Your portal collaboration community can be accessed by:

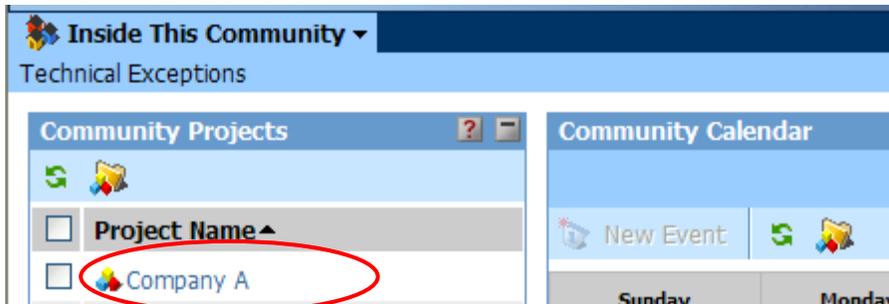
1. Typing <https://portal.ieso.ca/> on your browser or **Ctrl + Click** the link.
2. Click **Log In**



1. Enter your **User ID** and **Password**
2. Click the **NERC CIP Community** tab



3. Click the link under **Project Name**. For example: “Company A” user will see the example below:

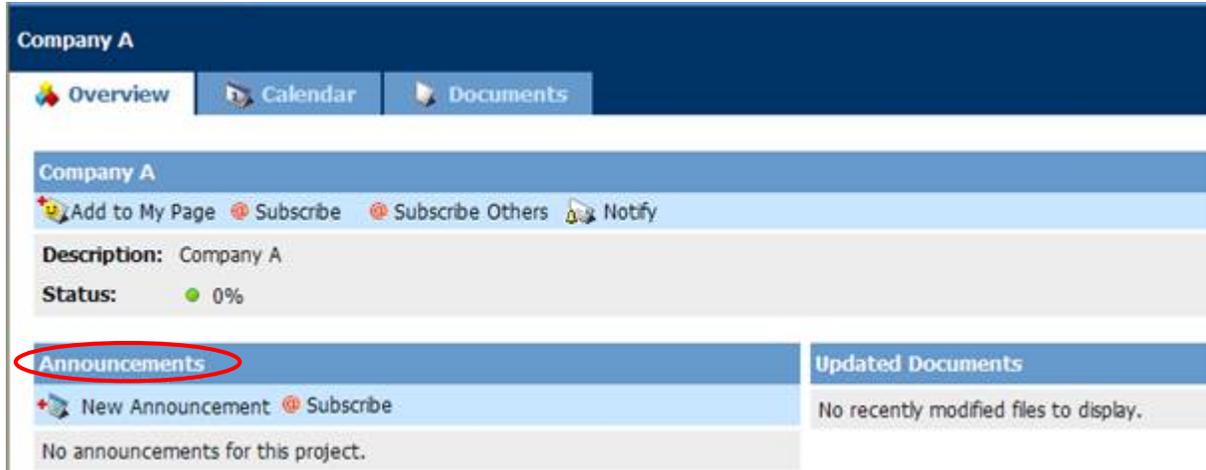


4. Access to the NERC CIP collaboration community is strictly controlled and monitored. You will see the following screen if you do not have the required access permissions. Please contact **IESO Customer Relations** for assistance.



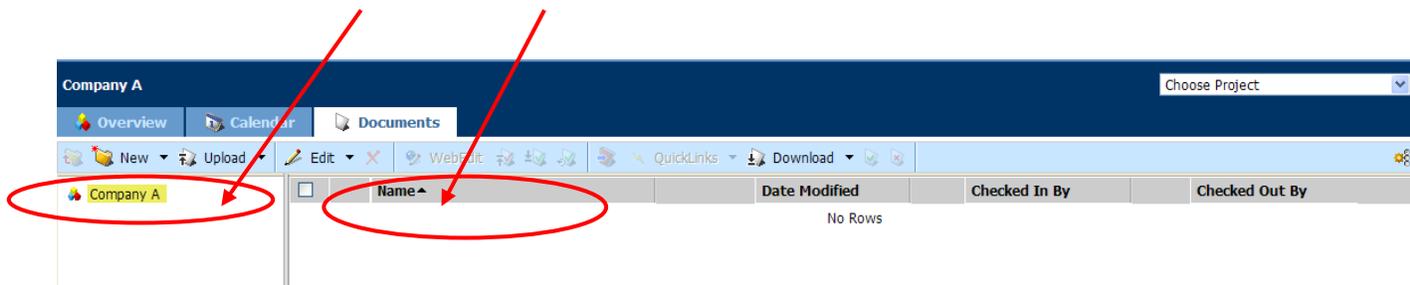
B.2 Overview

This page will contain any new **Announcements** that the *NERC CIP* Project Leaders may publish. You are also able to see the most recent documents that were uploaded for review.



B.3 Documents

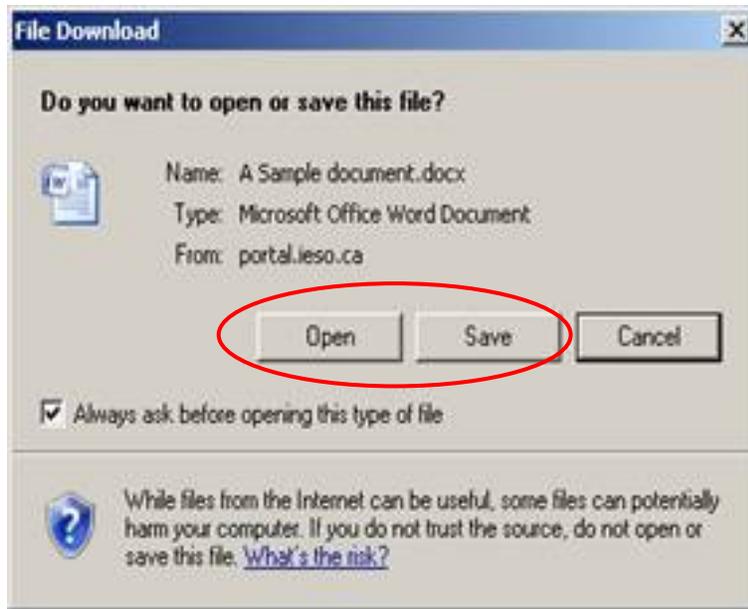
This location contains **folders** with **documents** for your review.



Please contact **IESO Customer Relations** for further information on the process for creating/uploading documents.

B.4 Opening Documents

1. Click on the document.
2. The following pop up will appear. Click **Open** to view the document. Click **Save** if you need to save the document to a different location and follow instructions.



– End of Section –

References

Document Name	Document ID
Procedure for Requesting and Receiving Technical Feasibility Exceptions to NERC Critical Infrastructure Protection Standards (Appendix 4D to the Rules of Procedure)	

– End of Document –