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MACD Update

RSSC Meeting #51

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Item #6

2020 CMP IN REVIEW

Good Practice

- RSAWs and IESO Guided SC Worksheets provided in the response;
- Referenced documents provided as part of the evidence;
- Provided evidence to support compliance statement;
- Responded clearly to questions asked in MACD's additional information requests;
- PSMP include issue date, review date and is formally authorized.
- PSMP clearly indicates which Components Types apply and which do not apply to the applicable facility.

Good Practice

NERC FAC-008-3:

- Facility rating methodology (FRM) document includes issue date, review date(s) and is formally authorized;
- FRM clearly addresses the methodology used to establish ratings;
- FRM covers all in-series equipment and addresses all sub-requirements in the standard;
- Detailed rating worksheet presents clear guidance that all equipment ratings are considered in the facility rating.

Good Practice

NERC PRC-005-6

- PSMP include issue date, review date(s) and is formally authorized;
- PSMP updated to reflect the current version of the standard;
- Maintenance spreadsheet sorted by component type, clearly identifies Component Minimum Maintenance Activities and Maximum Testing Intervals.

Good Practice

NERC PRC-005-6

- Component monitoring attributes, maintenance intervals and activities included in the maintenance spreadsheet;
- The last two maintenance dates and the next scheduled date included;
- PRC-005-6 submissions improved with the use of the MACD template.

Good Practice

NERC CIP-002-5.1a:

- Implemented processes, which considered all the assets required by the standard for the purpose of identifying the high, medium and low impact BES cyber systems;
- Reviewed the identifications periodically and had them approved by the CIP Senior Manager;
- Provided documented processes, with review logs clearly showing the review dates and the approval signature of the CIP Senior Manager.

Observations from SC reviews

General

- Submissions did not include a completed RSAW or an alternative compliance narrative;
- Documents provided were not dated and signed;
- In the case of parent companies' documents, it was not clear to which market participants/facilities the provided evidence applied.

Observations from SC reviews

NERC CIP-003-6 Cyber Security — Security Management Controls

- Attachment 1, Section 1: missing evidence to demonstrate that cyber security practices are implemented/reinforced as part of implementation of market participants' Cyber Security Awareness plan(s);
- Attachment 1, Section 4.5: missing evidence that market participants conducted a drill or tabletop exercise, or responded to an actual Reportable Cyber Security Incident.
- Ontario effective date of R2 is July 1, 2017.

Observations from SC reviews

NERC FAC-008-3 Facility Ratings

- FRM did not include certain series-connected equipment subject to R1 and/or R2. (Most commonly missed are revenue metering CTs);
- Equipment ratings for a common connecting segment to the transmitter not shown on the worksheet;
- FRM did not include evidence to demonstrate that the facility ratings are consistent with the FRM (R6). (Evidence: manufacturers ratings, nameplates, calculations, industry ratings, or engineering drawings.)

Observations from SC reviews

NERC PRC-005-6 Protection Systems Maintenance

- PSMPs reproduced standard requirements, as opposed to outlining a plan for Protection System Maintenance;
- Identify component types that are not applicable to the facility, in the Inventory spreadsheets;
- The equipment IDs in the PSMP did not reconcile with IDs in the single line diagrams or PSMP inventory lists;
- Date format in the PSMP inventory not consistent (4/31/2018, 2017/09/11), making it difficult to determine the actual dates.

Observations from SC reviews

NERC FAC-003-4 Transmission Vegetation Management

- Applicable transmission lines not clearly identified;
- The Transmission Vegetation Management Program did not document the maintenance strategies used to prevent the encroachment of vegetation into the minimum vegetation clearance distance (MVCD);
- Submissions did not include evidence that annual vegetation inspections on 100% of applicable transmission lines was performed;
- Evidence did not include a documented annual vegetation work plan.

Item #6

2021 CMP

OVERVIEW

2021 CMP

2021 CMP

- To be posted by the end of December 2020, on the IESO, System Reliability Internet page (link provided below):

<http://www.ieso.ca/en/sector-participants/system-reliability/ontario-reliability-compliance-program>

2021 CMP Overview

- Lists the reliability standards (NERC reliability standards, NPCC criteria and Ontario market rules) to be the focus of MACD's compliance monitoring activities in 2021.
- Provides insights into the discovery methods that MACD may use to assess compliance with these obligations.

2021 CMP Considerations

MACD considered several factors, including:

- the applicability of reliability standards in Ontario;
- the reliability risks of the standards at continent-wide and regional levels as reflected in the NERC CMEP and NPCC IP;
- the compliance history associated with each standard; and
- emerging threats and vulnerabilities impacting the power system.

Monitoring Tools

HOW	WHO	WHEN	WHAT
Self-certification	Selected market participants	45 calendar days	Evidence of compliance; monitored standards
Spot-Check	Selected market participants	Up to 30 (business) days in advance	Evidence of compliance as specified in the spot-check notification; all applicable standards
Audit	Selected market participants	90 calendar days	Evidence of compliance, as specified in the audit notification letter; all applicable standards
Data Submissions	Market participants classes identified in the 2021 CMP	As specified in the 2021 CMP	Specific requests/forms to be issued through the reliability tool

Self-Reporting

- Self-reporting relies on the monitoring mechanisms of the market participant's internal compliance program;
- MACD encourages market participants to self-report potential breaches at any time upon discovery and not wait until the time of self-certification or audit;
- The 2021 CMP details on how the timeliness and the content of a self-report affect the benefit of penalty mitigation to the participant;
- Possible non-compliance instances with any applicable reliability standard should be reported, not only with the standards in the CMP monitoring list.

What to Expect

- MACD will issue self-certifications as early as Q1 2021;
- Selected market participants will receive notification, via the Reliability Compliance Tool or the IESO/MACD Compliance Monitoring collaboration community;
- NERC RSAW (or a link to) will accompany the self-certification request for a specific reliability standard; market participant is expected to submit the completed RSAW (preferably in the MSWord format), or a narrative on how it meets compliance (refer to the “Compliance Assessment” section of the RSAW for guidance).

What to Expect (Cont'd)

- Market participant is expected to attach evidence of compliance (e.g. documented policies, procedures and plans, maintenance reports, etc.);
- PRC-005-6 maintenance worksheet template is expected to be filled out and submitted as self-certification evidence.

Questions



Thank You

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