

# Minutes of the Meeting

## Q2 2021 RSSC: Meeting #53

Meeting date: 10/06/2021

Meeting time: 09:30 a.m.

Meeting location: IESO Hosted WebEx

Chair/Sponsor: Sean Lagan/Darren Matsugu

Scribe: Ejiro Winthorpe

<b>Invitees</b>	<b>Representing</b>	<b>Attendance Status</b> <b>Attended, Regrets, Teleconference</b>
Payam Farahbakhsh	Hydro One	Teleconference - WebEx
Mike Bethuling	Hydro One	Teleconference - WebEx
Amelie Morissette	Evolugen	Teleconference - WebEx
David Kiguel	Independent	Teleconference - WebEx
Des Ngunangwa	Bruce Power	Teleconference - WebEx
Joel Charlebois	AESI	Teleconference - WebEx
Juri Baroskov	Capital Power	Teleconference - WebEx
Laurie Reid	OEB	Teleconference - WebEx
Hassan Vahed Kalanesh	Hydro One	Teleconference - WebEx
Helen Lainis	IESO	Teleconference - WebEx
Rob Antonishen	IESO	Teleconference - WebEx
Steve Cannon	Bruce Power	Teleconference - WebEx
Jacinda Belisle	Evolugen	Teleconference - WebEx
Dhvani Shah	Hydro One	Teleconference - WebEx
Kyle Smith	Northland Power	Teleconference - WebEx

<b>Invitees</b>	<b>Representing</b>	<b>Attendance Status Attended, Regrets, Teleconference</b>
Shahid Khan	Northland Power	Teleconference - WebEx
Paul Malozewski	Hydro One	Teleconference - WebEx
Sheraz Majid	Hydro One	Teleconference - WebEx
Yamilet Vargas Ribot	FPL	Teleconference - WebEx
Chris Moir	OPG	Teleconference - WebEx
Andrew Burmaster	Evolugen	Teleconference - WebEx
Andrew Punkari	Evolugen	Teleconference - WebEx
Catherine Either	OEB	Teleconference - WebEx
Sylvian Moore	Boralex	Teleconference - WebEx
Mike Cooke	OPG	Teleconference - WebEx
Kevin Wozniak	Hydro One	Teleconference - WebEx
Christian Shirabad	Atura	Teleconference - WebEx
Ejiro Winthorpe	IESO	Teleconference - WebEx
Michael Jacobs	Pattern Energy	Teleconference - WebEx
Abbas Munir	Bruce Power	Teleconference - WebEx

## Agenda Item 1: Welcome and Introductions

Sean Lagan kicked off the 53 RSSC meeting at 9:30 am welcoming participants, acknowledging the hardwork of Scott Berry as the outgoing committee chair.

Participants briefly introduced themselves. Anyone who attended by phone rather than logging into the Webex was asked to send an email to the scribe ([ejiro.winthorpe@ieso.ca](mailto:ejiro.winthorpe@ieso.ca))

## Agenda Item 2: Administrative Items

### Sean Lagan reviewed the Administrative Items.

The Meeting Agenda for meeting 52 (Q1 2021) was reviewed and adopted as constructed. The Meeting Minutes of the previous meeting were reviewed. Some minor changes were provided in advance of the meeting and incorporated into the draft. The minutes were accepted as drafted. The IESO will post all 2020 materials which are being revised to ensure compliance with the Accessibility for Ontarians with Disabilities Act (AODA). They will be posted in the near future.

Sean Lagan provided an update on open action items (posted below)

### Action Item Summary

ID	Date	Action	Status	Comments
Q1-2021-01	March 11, 2021	S. Berry to prepare a formal proposal for RSSC to move from 4 meetings to 3 meetings per year. Scott will assess impact of reduced meetings on communication of changes to IESO document/manuals.	New	Agenda Item 12 in today's meeting. Item is now closed.
Q1-2021-02	March 11, 2021	During the Q1 meeting, Rob Antonishen highlighted the NERC Implementation Guidance on CIP-008-6, which he indicated would be of value to present at the Q2 meeting with MP having their CIP Security members present for questions	New	Unable to include the item in the Q2 meeting as the agenda is full. The item will be included in a later 2021 meeting. Item remains open.
Q1-2021-03	March 11, 2021	S. Lagan to ensure the most recent version of the milestone document is uploaded online.	New	The link was updated in advance of the Q2 meeting. Item is now closed.

ID	Date	Action	Status	Comments
Q1-2021-04	March 11, 2021	Helen Lainis to emanine possible enhancements to MM11.1 – ‘Applicability Criteria for Compliance with NERC Reliability Standards and NPCC Criteria’ and will confirm the next lifecycle review date for the document	New	The proposed revisions were put on hold until the approval of MM11.5. the IESO will aim to include a revised version of MM11.1 in the September Baseline. Item remains open.
Q1-2021-05	March 11, 2021	Meeting participants noted that for the year 2021 PRC-004 and FAC-003 quarterly reporting, only one quarter was listed (Feb 2021) for the year. Historically, all quarters are posted. N. Bojevski noted this information is available, and took an action item to ensure the online material is updated.	New	MACD staff confirmed the required updates to the website were made following the Q1 meeting. Item is now closed.

## Agenda Item 3: CIP Standards Development Update

### **Rob Antonishen Provided the CIP Standards Development Update.**

#### **Active NERC SDTs**

Project 2019-02 BCSI in Cloud SDT made changes to CIP-004 and CIP-011 that have been accepted. The proposed changes made to CIP-004 and CIP-011 were accepted at final ballot on May 10, 2021.

Project 2016-02 CIP Mods SDT has proposed changes for CIP-002 through CIP-013 to address issues on Virtualization and External Routable Connectivity / Interactive Remote Access. Project 2016-02 SDT will make conforming changes to CIP-004 and CIP-011. Changes will be submitted to FERC for approval before Dec 31, 2021.

Project 2020-04 CIP-012 Mods SDT has proposed changes for CIP-012 to address availability of communications links and data used for real-time monitoring/assessments to address FERC Order 866. Changes included requirements for availability of communications and data (used for real-time monitoring and real-time assessments) between Control Centers, and build on previous changes to NERC Standards TOP-001-4 and IRO-010 that address data availability within Control Centers.

Project 2020-03 SDT Supply Chain Low Impact SDT has issued a SAR for CIP-003 to address issues associated with remote vendor access at Low Impact BES facilities. These issues were raised in the NERC Report "Supply Chain Risk Assessment", December 2019. A SAR was issued to define the scope of the proposed changes to CIP-003.

Project 2021-03 SDT TOCC CIP-002 is being formed to address changes to CIP-002 associated with Transmission Owner Control Centers that perform functions of a Transmission Operator. This SDT will use the SAR approved for the 2016-02 SDT.

### **Changes to CIP Requirements**

#### **In Effect:**

- CIP-013-2, CIP-005-6 and CIP-010-3 changes to address additional supply chain requirements came into effect Oct 1, 2020.
- CIP-008-6 changes to address reporting of attempted Cyber Security Incidents came into effect Jan 1, 2021.

#### **Future:**

- CIP-012-1 changes to address encryption of data communications for real-time monitoring and real-time assessment data will come into effect July 1, 2022.

Kurtis Chong enquired how other entities keep track of upcoming changes especially changes that overlap. Rob Antonishen stated that entities usually have a 24-month lead time (from the ballot stage to approval) for them to better prepare for the upcoming change(s).

## Agenda Item 4: O&P Standards Development

### **Helen Lainis delivered the O&P Standards Development update.**

#### Standards Development Update:

- Not a lot of activity regarding the Operations and Planning Standards. Focus had been on the proposed Cold Weather standard requirements. The ballot passed and NERC will be filing for regulatory approval once approved its Board of Trustees.

#### Action Item: Update MM11.1 – Applicability Criteria:

- Still open – initiated internal review and targeting 3-4<sup>th</sup> Q 2021 for draft for RSSC review

## Agenda Item 5: NERC Standards Implementation Roadmap

### **Hamad Shahbaz delivered the NERC Standards Implementation Roadmap**

The roadmap is posted online for participants to review.

Sean Lagan asked about the standards coming into effect in Q2 2021 specifically about the project and the rationale. Hamad Shabaz responded that at a higher level, most of the changes were administrative in nature with no impact to reliability stemming from NERC Project 2018-03.

## Agenda Item 6: Lessons Learned

### **Hamad Shahbaz delivered the Lessons Learned published by NERC since the last RSSC meeting.**

NERC posted two lessons learned since the last RSSC meeting.

- [Interconnection Oscillation Disturbances](#)
- [Controlled Islanding due to Wildfire Event](#)

Tabasum Bandey from Bruce Power wanted to know how the Lessons Learned are incorporated into the NERC standards Kurtis Chong noted that if a reliability gap is identified either NERC, the entity that was the subject of the Lessons Learned, or any other entity, could initiate a SAR which if approved, would become part of the reliability process.

## Agenda Item 7: MACD Update (Self Certifications/COVID-19 Update)

### **Cristian Dragnea delivered the MACD Update on Self-Certifications**

The IESO portal is being replaced with Workspaces. The IESO will soon be contacting existing portal users who would like to have access to Workspaces. MACD will be asking Market Participants to provide a list of users that would need access to Workspaces. The structure of the Workspaces includes folders for compliance enforcement, audits, monitoring and investigations.

## Agenda Item 8a: Revisions to MOD-025 Ontario Implementation Plan

### **Helen Lainis delivered the MOD-025 Implementation Plan Update**

A footnote has been added to the MOD-025 Ontario Implementation Plan that addresses the following situations:

- Generating units that are on long-term outage with an expected return to service date
  - beyond January 1, 2022, Market Participants
  - between July 1, 2021 and December 31, 2021

Market Participants will be required to complete the tests within six (6) months after the unit has returned of service.

Laurie Reid enquired if there were any issues with respect to the cold weather standards. Helen Lainis responded that the IESO may need to change some of its processes to ensure it is prepared for the new standards. Kurtis Chong advised Generator owners and Operators to review the

upcoming requirements especially TOP-003 and prepare for the upcoming changes during the implementation period.

## Agenda Item 8b: Update to PRC-027 Compliance

### **Kurtis Chong and Pedro Rebellon delivered the PRC-027 update**

PRC-027, came into effect on April 1<sup>st</sup>. The IESO wants to ensure that there are no unintended impacts to our neighbors or our systems. Kurtis stated that R1 calls for a process surrounding new and revised protection systems settings. However, R2 has a longer implementation period of up to six years. It offers some options on how to meet the requirement.

Dave Kwan stated that there is already an established approval process for Market Participants to contact the IESO. Dave Kwan wanted clarification that in addition, Market Participants would need to contact its neighbours (other Market Participants) to coordinate in case of in the event of a change in protection settings.

Payam Farahbakhsh added that Requirement R1 provides for each organization to have a methodology on how to proceed with coordinated protection and how those communications should take place. Kurtis Chong added that there needs to be a control in place to ensure that each Market Participant is doing its due diligence and communicating protection system setting changes to mitigate the risk of uncoordinated operation.

Kurtis Chong sought some feedback from the group to understand if Requirement R2 was clear and written in a way that entities can comply. In addition, Kurtis Chong wanted feedback on entities' understanding of how/what was needed to demonstrate compliance. Kurtis Chong also wanted feedback regarding the cycle for reviewing the fault current baseline and updating protection studies. Currently the requirement does not address the frequency of comparing the short circuit level against the baseline and it doesn't address how old the baseline can be.

Joel Charlebois added that it is not clear how old the baseline can be or how new it should be; the footnote is vague. Moving forward once baselines are updated every six years as a result of performing protection coordination study or as part of option #2 comparison, it will only be six years old. However, there is some confusion about the footnote that makes option #2 unclear. Joel Charlebois added that for option #1 nothing is required for day one of the effective date of the standard, the understanding is that entities have six years after the effective date of the standard to perform their coordination studies in accordance with procedures developed with Requirement R1. Kurtis wanted to know whether MPs felt there is an expectation to have an existing coordination study prior to the effective date of the Standard (April 1, 2021). Kyle Smith responded that for option #2 the expectation is to have an existing coordination study but for option #1, Market Participants can redo a study every six years.

For option #2 Kurtis Chong wanted to know members' thoughts about existing coordination studies that are ten years old. Payam Farahbakhsh mentioned that MPs can request short circuit currents for

their facility from Hydro One when needed. Also, Joel Charlebois noted that there is likely going to be an auditor interpretation of the standard where the expectation for option #2 is, if Market Participants want to use a prior baseline it must be no more than six years old. Joel Charlebois recommended reaching out to NPCC to see if their compliance person has a different view on the requirement.

Outcome:

Action item Q2-2021-01: Sean Lagan to distribute NERC PRC-027 resources to RSSC members

Action item Q2-2021-02: Sean Lagan to contact NPCC rep to inquire about their interpretation of compliance with the requirement

## Agenda Item 9: IESO's 2021 NERC Standard Audit

### **Sean Lagan Delivered a Summary of the IESO's 2021 NERC Standards Audit**

In November 2019 IESO submitted documentation to NPCC and opted to participate in the Internal Controls evaluation in addition to the mandatory on-site audit. In July 2020 IESO submitted Internal Controls documents for evaluation. Due to COVID-19 the audit was deferred to Q1 -2021. This was the IESO'S first remote audit. Over a thousand pages of RSAWS and evidence were collected and there were over 800 follow up questions and data request from NPCC staff.

In September 2020 IESO received the audit notification letter from the NPCC highlighting the scope of the audit, the audit period and deadlines to submit documentation. This was the first time the O&P and CIP standards were audited at the same time. This resulted in a few challenges with respect to logistics, overlapping resource demands and tools.

The audit was considered a success on our end, NPCC highlighted a number of positive observations. One potential non-compliance was identified; however, the potential non-compliance was administrative in nature. The recommendations relate mainly to processes and documentation controls that are easy to integrate into our current practices. The recommendations are currently being addressed and managed to completion.

Dave Kwan asked if one potential non-compliance is considered a successful audit. Sean Lagan responded that we are happy with the findings especially since the potential non-compliance was administrative in nature. Kurtis Chong added that the audit was a lot more in-depth, the internal controls affected the depth of the audit. Scott Berry added that the region seems to be heading towards a more internal controls focus with the need to ensure that there are processes in place to get the desired result.

The NPCC is undergoing an organizational change which is resulting in a much more in-depth audit approach. Cristian Dragnea stated that the remote audit was well organized and there were good conversations from both sides of the audit. Tabasum Bandey enquired if the lessons learned from the last audit will be shared with the group to help participants get better. Kurtis Chong responded stating that we are currently finalizing our audit lessons learned report after surveying internal



resources that were involved in the preparation and approval of documentation, in addition to completing a survey of entities external to Ontario to get information on their practices. This will help the IESO prepare for future audits, spot checks and other compliance actions. Kurtis Chong stated that some of the information collected will likely be shared with the group to help improve internal controls programs. Kurtis Chong mentioned that remote audits will continue to be a feature of NPCC standards and the practice of stand alone evaluations of internal controls is likely to be discontinued. Nayab Saeed wanted clarification on the intent of NPCC remote audit of our facilities and what the NPCC was looking for. Scott Berry responded that auditors typically go through our control room, back up control centre, data centre to do an assessment of the tools etc. IESO provided the auditors video and photographic evidence of things they were looking for; this was an opportunity for IESO to provide visual evidence of things that were stated on paper. Morgan Tam from Trans Alta asked about the number of IRs and she wanted to know about the size of the support team and the strategy to respond to the volume of questions. Sean Lagan responded that it was a labour intensive approach consisting of SMEs, Back up SMEs, Administrators, IT staff and the CA team.

## Agenda Item 10: OSRP Update – Workshops, Periodic Testing

### **John Antonakos Delivered the OPSRP Update**

OSRP was reviewed and issued in December 2020 to ensure AODA compliance.

The OPSRP is being reviewed to incorporate the changes around how we work with storage generation in the event of a system disturbance. There is currently no timeline for this.

With respect to Directory 8, the IESO has started a review and they will be looking at the different elements and taking into account clarification questions and the update should be in the last quarter of the year. John Antonakos advised those affected to be on the look out for the document later in the year. There are a series of restoration workshops scheduled throughout the year. As a result of the pandemic all workshops are now virtual. The next restoration workshop is scheduled for June 24<sup>th</sup>.

## Agenda Item 11: Market Manual 11.5 Update

### **Sean Lagan Delivered the Market Manual 11.5 Update**

Sean provided an update on Market Manual 11.5 including the recent changes. The document consolidates existing reliability standards and market rule requirements related to model validation of generation and electricity storage facilities and other devices. There are no new compliance requirements. The document was published as part of Baseline 45.1 and came into effect in June 2021.

## Agenda Item 12: Future Meeting Schedule

### **Scott Berry Delivered the Future Meeting Schedule**

Scott Berry sought consensus from the committee to change the meeting frequency to three times a year from four times a year. This proposal recommends placing the meetings between the Baseline release dates for market facing documents, which would enable Market Participants to address upcoming issues and provide them enough time to affect changes. Scott Berry and Sean Lagan proposed moving the September 23<sup>rd</sup> meeting to sometime in October. Morgan Tam mentioned that she appreciated the IESO timing the proposed changes in accordance with other events in the industry. Scott Berry stated that he would be amending the terms of reference and Sean Lagan would be bringing it back to the next meeting. Scott Berry was also seeking consensus regarding cancelling one of the proposed three meetings in the absence of sufficient materials to hold a meeting. Sean Lagan commented that reducing to two meetings a year could leave a big gap. Dave Kwan added that there would be a big gap with two meetings but there may be a benefit in keeping the clause to cancel a meeting in the event of insufficient agenda items, Scott Berry mentioned we would set up a meeting on October 21<sup>st</sup> for our third meeting of the year. Kurtis Chong enquired whether a clause was needed to be able to hold an additional adhoc meeting in case a specific issue needed to be addressed. Scott Berry responded that there is nothing that precludes the RSSC from convening a meeting without waiting for a general meeting. The next RSSC meeting will be scheduled for October 21<sup>st</sup>

### Future Meeting Dates:

#### **The 2021 RSSC Meeting Dates are;**

The committee as agreed to move from four meetings to three. As such, the previously scheduled September 23<sup>rd</sup> and December 9<sup>th</sup> meetings have been cancelled. The final meeting of the year is scheduled for October 21<sup>st</sup>

The meeting is adjourned at 12:29 pm

### Action Items at Completion of 2021 RSSC Q2 Meeting

ID	Date	Asignee	Action	Status	Comments
Q2-2021-01	June 10, 2021	Sean Lagan	Forward PRC-027 resources to RSSC members.		
Q2-2021-02	June 10, 2021	Sean Lagan	Sean Lagan to contact NPCC rep to inquire about their interpretation of compliance with the requirement		