

Minutes of the Meeting

Q1 2023 RSSC: Meeting #57

Meeting date: 03/08/2023
 Meeting time: 09:30 a.m.
 Meeting location: IESO Hosted MS Teams

Chair/Sponsor: Scott Berry/Darren Matsugu
 Scribe: Harish Vijay Kumar

Invitees	Representing	Attendance Status Attended, Regrets, Teleconference
Mike Beuthling	Hydro One	Teleconference - MS Teams
Hassan Vahed Kalankesh	Hydro One	Teleconference - MS Teams
Mike Zajmalowski	Northland Power	Teleconference - MS Teams
Keven Van Velzen	BBA	Teleconference - MS Teams
Helen Lainis	IESO	Teleconference - MS Teams
Monica Adam	IESO	Teleconference - MS Teams
Andrew Burmaster	Evolugen	Teleconference - MS Teams
Constantin Chitescu	Bruce Power	Teleconference - MS Teams
Joel Charlebois	AESI	Teleconference - MS Teams
Desderius Ngunangwa	Bruce Power	Teleconference - MS Teams
Michael Takla	OPG	Teleconference - MS Teams
Catherine Ethier	OEB	Teleconference - MS Teams
Ola Murxmur	Hydro One	Teleconference - MS Teams
Prasath Selvanayagam	Kestrel Power	Teleconference - MS Teams

Invitees	Representing	Attendance Status Attended, Regrets, Teleconference
Norm Dang	IESO	Teleconference - MS Teams
Joel Charlebois	AESI	Teleconference - MS Teams
Abbas Munir	Bruce Power	Teleconference - MS Teams
Tobi Ayagi	OPG	Teleconference - MS Teams
Mark Townsend	Hydro One	Teleconference - MS Teams
Colin Elwood	Bruce Power	Teleconference - MS Teams
Bendong Sun	Bruce Power	Teleconference - MS Teams
Mernaz Malozewski	Guidehouse	Teleconference - MS Teams
Hassib El murdea	OPG	Teleconference - MS Teams
Kevin Samuel	FPL	Teleconference - MS Teams
John Nguyen	IESO	Teleconference - MS Teams
Kurt Sullivan	Kestral Power	Teleconference - MS Teams
David Kwan	OPG	Teleconference - MS Teams
Kyle Smyth	Northland Power	Teleconference - MS Teams
Melissa Herman	Capital Power	Teleconference - MS Teams
Keven Van Velzen	BBA	Teleconference - MS Teams
Alex Zbarcea	Hydro One	Teleconference - MS Teams
Prithvi (Shawn) Nandy	Transalta	Teleconference - MS Teams
Conrad Christiansen	Transalta	Teleconference - MS Teams

Agenda Item 1: Welcome and Introductions

Scott Berry kicked off the 57th RSSC meeting at 9:30 AM welcoming participants. Scott requested new RSSC participants to introduce themselves. Scott then shared a safety message about slip, trips and falls due to winter season during snow shoveling, snow storms and the use of snow blowers.

Agenda Item 2: Administrative Items

The agenda for the 57th RSSC meeting was reviewed by Scott Berry. Hasseb El Murdea moved to adopt the agenda and the agenda was adopted as constructed.

The minutes of the previous RSSC meeting (56th) were reviewed. Hasseb El Murdea moved to adopt the meeting minutes; these were accepted as drafted.

Scott also mentioned that there were no action items from the previous meeting.

Agenda Item 3: CIP standards Development Update

Norm Dang delivered the CIP Standards Development Update

Active NERC SDTs

Project 2016-02 CIP Mods SDT - made changes to CIP-002 and CIP-013.

Planning to issue Draft 5 at the end of March for CIP-005-8 and CIP-010-5.

Project 2020-04 CIP-012 Mods SDT - proposed changes to CIP-012.

Failed on drafted availability requirements. Call for new additional SDT members to replace existing members that have retired.

Project 2020-03 SDT Supply Chain Low Impact SDT

submitted to FERC on Dec 6, 2023

Project 2021-03 SDT TOCC – made changes to CIP-002/CIP-014

Changes to address

- Transmission Owner Control Centres (TOCC) that perform function of a Transmission Operator (CIP-002).
- Define classification process of Electronic Access Control and Monitoring systems (EACMS), Physical Access Control Systems (PACS) and Protected Cyber Assets (PCA) (CIP-002)
- Change wording related to Interconnection Reliability Operating Limit (IROL) as part of changes started by NERC project 2015-09- System Operating Limits (CIP-002/CIP-014)
- Comments to 2 draft SARs submitted, New SAR submitted, TOCC Field Test completed.

Project 2022-05 – made changes to CIP-008, Reporting threshold

- Changes to CIP-008-6 to a define some minimum criteria to evaluate and define “attempts to compromise” cyber security incidents.
- Comments to draft SAR submitted

New CIP Requirements

CIP-013-2, CIP-005-7 and CIP-010-4 – Standards to address supply chain requirements for PACS, EACMS: New versions come into effect Oct 1, 2022.

CIP-004-7 and CIP-011-3 – BES cybersecurity information (BCSI) in the cloud: New versions come into effect on Jan 1,2024, (Note – early adoption is allowed to take advantage of these changes)

CIP-003-9 Vendor electronic remote access controls for Low Impact BES Cyber systems(BCS) (effective date: TBD - filed with FERC Dec 6, 2022 , 3 year implementation plan)

Other Items

FERC Order RD23-2-000 was issued on Dec 15, 2022 directing NERC to conduct a study evaluating the effectiveness of Reliability Standard CIP-014-3 and submit the report within 120 days. It is anticipated that FERC may **order extending CIP-014 protections** other critical BES assets such as control centers belonging to Reliability Operators, Balancing Authorities, etc.

FERC Order RM22-3-000 issued on Jan 19, 2023 on Internal Network Security Monitoring requiring NERC to modify CIP Standards within the next 15 months for High and Medium impact BES Cyber Systems with External Routable Connectivity(ERC). NERC is also ordered to evaluate the same protection for Low impact and remaining Medium impact BES Cyber Systems within the next 12 months. Note that CIP-003-9 (submitted to FERC) already requires monitoring of remote vendor communications to Low impact BES Cyber Systems. This order may eventually extend monitoring to all network activity associated with Low impact BES Cyber Systems

US Federal Government National Cybersecurity Strategy (NCS) - Biden Administration announced a National Cybersecurity Strategy on March 03, 2023. It appears that EPA (water sector) and DOE (electricity sector) will be the lead agencies in developing the National Cybersecurity Strategy with respect to cyber protections for critical infrastructure. It remains to be seen how the creation of this NCS will impact the NERC CIP Standards

Agenda Item 4: O&P Standards Development

Helen Lainis delivered the O&P Standards Development update.

Project 2021-07, Extreme Cold weather grid operations, preparedness and coordination standards – EOP-011-3 and EOP-012-1

- Formal comment period and initial ballot due **April 13, 2023** for the following:
 - EOP-011-4 – Emergency Operations
 - TOP-002-5 – Operations Planning

Extreme Cold Weather Grid Operations, Preparedness, and Coordination: Phase 1 – FERC Order

Changes and new requirements to EOP-012-1

- Modify EOP-012-1 to ensure that it captures all bulk electric system generation resources needed for reliable operation and excludes only those generation resources not relied upon during freezing conditions
- Modifications to EOP-012-1 Requirements R1 and R7 to address concerns related to the ambiguity of generator- defined declarations of technical, commercial, or operational constraints that exempt a generator owner from implementing the appropriate freeze protection measures
- Modify EOP-012-1 to address concerns related to the lack of an implementation timeframe for corrective action plans (deadline)
- Require a shorter implementation period and staggered implementation for unit(s) in a generator owner's fleet
- Modify EOP-012-1 Requirement R1 to ensure that generators that are technically incapable of operating for 12 continuous hours (e.g., solar facilities during winter months with less than 12 hours of sunlight) are not excluded from complying with the Standard.

Extreme Cold Weather Grid Operations, Preparedness, and Coordination:
Phase 2

Phase 2 includes the following Recommendations from the Joint Inquiry Report:

- 1a – GO identification of cold-weather-critical components and systems (partly resolved in Phase 1 proposal)
- 1b – GO identification and implementation of freeze protection measures on each of the elements identified per 1a (partly resolved in Phase 1 proposal)
- 1c – GO requirement to account for the effects of precipitation and wind
- 1g – Revisions to provide greater specificity of the role each GO, GOP, and BA plays in determining generator capacity
- 1h – Language in BA operating plans that prohibits critical natural gas infrastructure loads from participating in demand response programs
- 1i – Specific requirements applicable to BAs, TOPs, PCs, and TPs around manual and automatic load shedding that protect critical natural gas infrastructure from load shedding

New Requirement for TOP-002-4 - Balancing Authority Operating Process
(Recommendation 1g)

- BAs to be required to have an extreme cold weather operating process, as part of its operating plan
- Criteria for extreme cold weather operating process is mentioned below
 - Methodology for identifying an extreme cold weather period expected to affect Balancing Authority Area
 - Methodology that determines appropriate reserve margin during extreme cold weather period
 - Methodology to determine a five day hourly forecast during the extreme cold weather period

Changes and new requirements to EOP-011-4

- Proposed changes address identification and protection of critical natural gas infrastructure load (Recommendations 1h and 1i)
 - Excluded from Manual Load Shed
 - Excluded from Automatic Load Shed
 - Excluded from Demand Response programs
- Added Functional Entities to Applicability
 - Distribution Provider
 - UFLS-only Distribution Provider
 - Transmission Owner
- TOP in its Emergency Operations Plan to include:
 - Provisions for identification and prioritization of designated critical natural gas infrastructure loads
 - Provisions for identification of Distribution Providers, UFLS-only Distribution Providers, and Transmission Owners required to mitigate operating Emergencies
- BA in its Emergency Operations Plan to include:
 - Provisions for excluding critical natural gas infrastructure loads as interruptible load, curtailable load, and from demand response
 - During periods when it would adversely impact the reliable operation of the BES
- Distribution Provider, UFLS-only Distribution Provider, and Transmission Owner to create Operating Plans that:
 - Provisions for identification and prioritization of designated critical natural gas infrastructure loads
 - Minimizes overlap of circuits designated for manual and automatic load shedding from circuits for designated critical load, including critical natural gas infrastructure loads
 - Minimize overlap of circuits designated for manual and automatic load shedding from circuits utilized for UFLS and UVLS
 - Limit utilization of UFLS or UVLS circuits from manual load shed to situations where warranted by system condition

Project 2022-01, Reporting ACE Definition and Associated Terms – Standard Authorization Request

- Comment period due March 16, 2023. The SAR states that the current definition of Reporting Area Control Error (ACE) presents a conflict with the Western Interconnection's Automatic Time Error Correction (ATEC) process and does not allow other Interconnections to pursue ATEC.

- Additionally, there is confusion in that the terms ACE and Reporting ACE are both used throughout the standards.
- A revised definition should provide improve long-term average frequency performance as well as give other Interconnections the ability to pursue automatic correction approaches.

Project 2023-01, EOP-004-4, IBR Event reporting - Standard Authorization Request

Comment period due March 8, 2023.

- The SAR proposes modifications to EOP-004-4 (EOP-004) focused on ensuring timely reporting by industry to NERC through reporting of events involving inverter-based resources (IBRs).
- Currently, the standard has relatively large generator loss size thresholds and uses language more suitable for synchronous generation.
- The modifications will add clarity and lower the generator loss threshold to encompass the lessons from widespread IBR loss events that have occurred.

Project 2023-02, PRC-004-6 Performance of IBRs – Standard Authorization Request

Comment period due March 23, 2023.

- Require analysis and mitigation of unexpected or unwarranted protection and control operations from inverter-based resources following the identification of such a performance issue.
- Include any types of protections or controls that result in abnormal performance issues within the plant, including abnormal performance resulting in anomalous behavior of active power output from the facility during events.
- Considerations may be needed for legacy facilities, but the root cause analysis of the abnormal performance and determination of any mitigating measures should be conducted.
- The SAR should be applicable to all Bulk Electric System (BES) inverter-based generating resources, including battery energy storage resources.

Contantine from OPG enquired about the implementation plan for EOP-011-4. Helen mentioned that she will reach out to Contantine about this.

Agenda Item 5: NERC Standards Implementation Roadmap

Scott Berry delivered the NERC Standards Implementation Roadmap

Scott gave a brief overview of the updated standards Roadmap, he mentioned about the changes that were made to the roadmap with respect to the United States implementation date and Ontario Implementation dates. Scott indicated that the AODA complaint version of the roadmap will be posted online for the participants after the meeting.

Agenda Item 6: MACD Update (Self Certifications, compliance assessments)

Monica Adams delivered the MACD Update.

Monica spoke about the 2023 Compliance monitoring plan (CMP) update. A number of self-certification requests have been issued on last week of February and the submission deadline is around April 17, 2023. There will be additional self certification requests released in the near future. For CIP requests, MACD will hold a preparatory meeting with each MP to introduce the NERC ERT (Evidence Request tool)

Market participants are expected to do the following:

- Submit the completed RSAW (preferably in MS Word format) or narrative on how it meets compliance.
- Attach evidence of compliance (e.g. documented policies, procedures and plans, maintenance and reports, etc.)
- PRC-005-6 maintenance worksheet template is expected to be filled out and submitted as self-certification evidence. Fill out and submit the ERT data as per discussion with MACD.
- MACD has embarked into a project to provide the disposition and conclude all outstanding enforcement matters (i.e., possible non-compliance resulting from self-reports, self-certifications, audits, etc.);

MACD will contact each market participant with outstanding enforcement matters to relay its decision on those matters.

Mike Zajmalowski enquired about the use of comparable worksheet that contains the same information that is embedded in the templates provided by MACD, Monica responded that it will be acceptable by MACD and they don't want MPs to replicate work.

Alex from Hydro One enquired if there is a specific threshold that MACD is considering for close outs to the backlogs and Monica responded that it will be looked upon on a case by case basis and also mentioned that factors like age of the file, potential impact to reliability and recurrence which will play a role to determine the enforcement actions.

Agenda Item 7: OPSRP Update

Scott delivered the OPSRP Update

- **Directory #8 Review:**
 - The NPCC Full Member Committee voted to approve the revisions to Directory #8 in early February.
 - As part of the review, seven new NPCC Glossary terms were established, consistent with changes being proposed to the criteria.
 - The latest version of Directory #8 may be found on the NPCC website, with an effective date of February 2, 2023.

- **Ontario Power System Restoration Plan (OPSRP):**

- The OPSRP was reviewed and revised with minor edits in 2022, and was released this past December with an effective date of December 19, 2022. The confidential version of the plan was sent to Emergency Preparedness Planning (EPP) role contacts from restoration participants, along with a password in a separate email. If anyone had any trouble accessing the plan, please reach out to Saad at Saad.Ansari@ieso.ca.
- We will convene the next cycle of reviews and updates in the upcoming summer.

- **Restoration Workshops:**

- There are four Restoration Workshops planned for 2023. The first one is coming up on March 22, 2023 in Ajax. An initial notice and reminder email was sent to all EPP role contacts from Restoration Participants. Although registration is closed, if there are any last minute folks that wish to attend, please email Saad.Ansari@ieso.ca by end-of-day today.
- The next Restoration Workshop will take place on June 7 in Kincardine, followed by September 13 in Sault Ste. Marie. The final restoration workshop for 2023 will take place on November 22, and this one will be virtual. The registration form for these three workshops has not yet been released, but will be communicated via email to the EPP role contacts from Restoration Participant organizations.

Agenda Item 8: Lessons Learned and NERC Alerts

Harish Vijay Kumar delivered the Lessons Learned and NERC Alerts published by NERC since the last RSSC meeting. NERC posted two lessons learned since the last RSSC meeting.

Lessons learned

- Air Blast Circuit Breaker Cold Weather Operations
- Preventing unwanted operations during relay diagnostic restarts.

Agenda Item 9: Closing Remarks

Scott Berry invited Market Participants to share topics of their interest, which they would like to discuss in the next RSSC meeting within next month. Scott enquired about the interest to reintroduce the RSSC subcommittee for CIP standards, many market participants mentioned that they see the value in reintroducing the subcommittee. Scott mentioned that he will take this as an action item to talk to Nick Persuti who is the director for CIP standards and see if he is interested.

Adjournment

The IESO will issue MS Teams invitations for meeting #2 of 2023, which will be held on June 15th. This will be in a hybrid format.

The meeting adjourned at 11:39 AM.

Action Items at Completion of 2022 RSSC Q1 Meeting

ID	Date	Asignee	Action	Status	Comments
Q1-2023-01	08/03/2023	Helen	Helen to provide EOP-011-4 implementation plan to Constantine.	Open	
Q1-2023-02	08/03/2023	Scott	Discuss with Nikola about reintroducing the CIP-RSSC-subcommittee.	Open	