

## Market Participant Comment Matrix – October 18, 2016



### Proposed New Alberta Reliability Standard CIP-SUPP-002-AB, *Cyber Security – Supplemental CIP Alberta Reliability Standard Technical Feasibility Exceptions* (“New CIP-SUPP-002-AB”)

Date of Request for Comment: <u>October 18, 2016</u>	Contact: <u>Travis Robinson</u>
Period of Comment: <u>October 18, 2016</u> through <u>November 25, 2016</u>	Phone: <u>7804123079</u>
Comments From: <u>EPCOR Distribution &amp; Transmission Inc.</u>	Email: <u>trobinson@epcor.com</u>
Date [yyyy/mm/dd]: <u>2016/11/25</u>	

Listed below is the summary description of changes for the proposed New CIP-SUPP-002-AB. Please refer back to the Consultation Letter under the “Attachments” section to view materials related to the proposed New CIP-SUPP-002-AB. Please place your comments/reasons for position underneath (if any).

1. Alberta Reliability Standard	Market Participant Comments and/or Alternative Proposal
<b>New</b> The AESO is seeking comments from market participants with regard to the following matters:  1. Are there any requirements contained in the proposed New CIP-SUPP-002-AB that are not clearly articulated? If yes, please indicate the specific section of the New CIP-SUPP-002-AB, describe the concern and suggest alternative language.  2. Please provide any additional comments regarding the proposed New CIP-SUPP-002-AB.	<b>Comment # 1:</b>  In the draft ID #2016-005RS, Section 5.1 (b) (i) states that one of the necessary criteria for the AESO to approve a TFE request is that the “proposed mitigation plan, in the determination of the AESO, would achieve a level of reliability of the bulk electric system comparable to or higher than compliance with the requirement.” However, Section 5.2 list several grounds for a TFE request where the mitigation would not achieve that level of reliability of the BES. Two examples are 5.2 (c) and (f) which state that compliance with a CIP ARS requirement:  (c) while technically possible and operationally feasible, cannot be achieved by the date the Responsible Entity is required to comply with the CIP ARS due to factors such as scarce technical resources, limitations on the availability of required equipment or components, or the need to construct, install or modify equipment during planned outages;  (f) would require the incurrence of costs that far exceed the benefits to the reliability of the bulk electric system of compliance with the requirement, such as requiring the retirement of existing equipment that is not capable of compliance with the requirement but is far from the end of its useful life and replacement with newer-generation equipment that is capable of compliance, where the incremental risk to the reliable operation of the asset and to the reliable operation of the facility and the bulk electric system of continuing to operate with the existing equipment is minimal.  Since Sections 5.1 and 5.2 of this ID are the criteria referenced in R5 of CIP-SUPP-002-AB for the ISO to consider when determining whether to approve or disapprove a request for a TFE, these sections should be consistent with each other with a focus on the reliability of the BES and not on compliance requirements if the reduction in the reliability in the BES is minimal and acceptable. EDTI proposes modifying 5.1(b)(i)

	<p>to:</p> <p>“the proposed mitigation plan, in the determination of the AESO, would achieve an adequate level of reliability of the bulk electric system;”</p> <p>Comment # 2:</p> <p>EDTI recommends that the AESO investigate other non-paper TFE submittal and updating methods. If an entity has numerous TFEs for a number of devices, tracking and updating mitigation plans in the current draft TFE request form will be laborious and inefficient. Using a spreadsheet to track numerous TFEs would be much easier to maintain and track, both for the reporting entity and the AESO.</p> <p>Comment # 3:</p> <p>EDTI would like some clarity on when an entity with an approved TFE is deemed compliant with that TFE. Can the AESO confirm that it is the date when the TFE is approved, even if the mitigation plan is not complete at the time of the TFE approval?</p>
--	---