

<p>Date of Request for Comment: <u>May 31, 2018</u></p> <p>Period of Consultation: <u>May 31, 2018</u> through <u>June 15, 2018</u></p>		
Alberta Reliability Standard	Market Participant Comments and/or Alternative Proposal	AESO Replies
<p>New</p> <p>The AESO is seeking comments from market participants with regard to the following matters:</p> <p>1. Are there any requirements contained in proposed CIP-014-AB-2 that are not clearly articulated? If yes, please indicate the specific section of proposed CIP-014-AB-2, describe the concern and suggest alternative language.</p> <p>2. Please provide any additional comments regarding proposed CIP-014-AB-2.</p> <p>Applicability:</p> <p>This reliability standard applies to:</p> <p>(a) the legal owner of a transmission facility that the ISO notifies pursuant to requirement R2;</p> <p>(b) the operator of a transmission facility that the legal owner of a transmission facility notifies pursuant to requirement R3; and</p> <p>(c) the ISO.</p> <p>R4</p>	<p><u>AltaLink Management Ltd. (“AML”)</u></p> <p>1. Suggest the Applicability (a) and (b) be changed as:</p> <p>(a) the legal owner of a transmission facility that owns any transmission substations identified through the application of requirement R1 by the ISO;</p> <p>(b) the operator of a transmission facility that operate the primary control center from which it controls any transmission substations identified through the application of requirement R1 by the ISO; and</p> <p>2. For R4.1, can you please clarify what the “control centres” here are? Do they include transmission operator’s control center (e.g. AltaLink Control Center) and AESO’s control center ?</p> <p>3. For R4.3, can you please clarify if the “Canadian governmental agencies, or their successors” includes those Alberta provincial entities, such as Alberta Security and Strategic Intelligence Support Team (ASSIST)?</p>	<p><u>AltaLink Management Ltd. (“AML”)</u></p> <p>1. While the AESO agrees that the suggested wording is accurate, the AESO prefers the brevity of the originally proposed applicability language.</p> <p>2. For clarification of “control centres” refer to the term in the Consolidated Authoritative Document Glossary. Further, “primary control centres” in R4.1 refers to R4(b) “the operator of a transmission facility with a primary control centre that controls any of the substations identified in the notification provided under requirement R3.”</p> <p>3. Provincial entities such as the Alberta Security and Strategic Intelligence Support Team (ASSIST) are considered Canadian governmental agencies.</p>

<p>R4.1 unique characteristics of the identified transmission substations and primary control centres;</p> <p>R4.3 intelligence or threat warnings received from sources such as law enforcement, the Electric Reliability Organization, the Electricity Information Sharing and Analysis Center, U.S. federal governmental agencies, Canadian governmental agencies, or their successors.</p> <p>R6</p> <p>R6.1 Each of the legal owner of a transmission facility, operator of a transmission facility, and the ISO must select an unaffiliated third party reviewer from the following:</p> <ul style="list-style-type: none"> (a) an entity or organization with electric industry physical security experience and whose review staff has at least one member who holds either a Certified Protection Professional or Physical Security Professional certification; (b) an entity or organization approved by the NERC; (c) a governmental agency with physical security expertise; or (d) an entity or organization with demonstrated law enforcement, government, or military physical security expertise. 	<p>4. For R6.1(b), suggest it be changed to "an entity or organization approved by the ISO;"</p> <p>5. For R6.1(d), can you please clarify what the word "Demonstrated" means here? Should it be "Accredited"?</p> <p>6. Can you please clarify why NERC's R1.2 is removed?</p>	<p>4. The AESO does not maintain a list of approved entities or organizations that perform the work required of an "unaffiliated third party" in R6.1. Please refer to NERC for approved organizations, or provide evidence under R6.1(d).</p> <p>5. The word "demonstrated" means that the Responsible Entity must provide evidence that an entity or organization selected under R6.1(d) has relevant "physical security expertise". Depending on the extent of the details provided, documented examples of relevant physical security work performed or a company profile may be sufficient to demonstrate an entity or organization's required expertise.</p> <p>6. Requirement R1.2 was intentionally left blank as R1 applies to the AESO. Requirement R3 achieves the same outcome.</p>
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<p>Please provide any additional comments regarding proposed CIP-014-AB-2.</p>		
<div></div>	<p><u>ATCO Electric Ltd. (ATCO)</u></p> <p>7. (R1) Can the AESO provide a definition of instability and uncontrolled separation to ensure MP's fully understand and ensure compliance as 'cascading' already is a defined term.</p> <p>8. It not clear on which agencies listed in R4.3 that we would need to coordinate with? If we don't interact with some, is that acceptable to disregard? Do we need to show that we evaluated all of the threats in each of the agencies even if it a US agency?</p> <p>9. Does R4 need to be completed as part of completing R5? Do we need to be compliant with R4 in the same timeline as R5. ATCO would appreciate it if AESO could supply a timeline for compliance to the Requirements as it is somewhat difficult to understand and ensure that we are fully compliant at the correct intervals.</p> <p>10. What happens if we can't meet the timelines because of availability of the third part resouces, geographic locations, number of sites, etc in scope in R6.2; ATCO would suggest the ability to</p>	<p><u>ATCO Electric Ltd. (ATCO)</u></p> <p>7. Requirement R1 only applies to the AESO. The AESO is of the opinion that instability and uncontrolled separation are commonly understood industry terms. Consequently the AESO does not intend to provide definitions for these terms.</p> <p>8. R4, and specifically R4.3, requires applicable Responsible Entities to "conduct an evaluation of potential threats and vulnerabilities of a physical attack" considering "intelligence or threat warnings received from sources such as....". The use of "such as" in R4.3 means that Responsible Entities have discretion to choose intelligence and threat warnings from appropriate sources, which for Canadian entities may also include information from foreign sources.</p> <p>9. The associated ID has a workflow that illustrates the timeline for CIP-014. Requirements R4, R5, and R6 are written in such a way as to provide the Responsible Entity flexibility to determine how to complete requirement R4, R5, and R6. For example, the Responsible Entity could collaborate with their unaffiliated third party reviewer to perform an evaluation of potential threats and vulnerabilities (requirement R4) and develop a security plan (requirement R5) to satisfy requirements R4 through R6 simultaneously.</p> <p>10. Requirements R4, R5, and R6 are written in such a way as to provide the Responsible Entity flexibility in meeting the timelines.</p>

	<p>apply for an extension under R6.2 if the 90 days can not be met.</p> <p>11. What is an “unaffiliated” third party under R6.1? The measure for R6.1 wants us to show evidence that we selected an unaffiliated third party. What constitutes acceptable evidence? Can we use a non-regulated sister company?</p>	<p>Activities required by each requirement may, to a certain extent, be conducted in parallel. The AESO recommends engaging third parties early to ensure availability of resources. The AESO does not currently intend to allow for extensions.</p> <p>11. The NERC provides clarification of the term “unaffiliated” in the Guidelines and Technical Basis section of NERC CIP-014-2 <i>Physical Security</i>. The NERC takes the position that “unaffiliated” means that the selected verifying entity cannot be a corporate affiliate (i.e., the verifying or third party reviewer cannot be an entity that corporately controls, is controlled by or is under common control with, the Transmission Owner). The verifying entity also cannot be a division of the Transmission Owner that operates as a functional unit. The AESO generally agrees with the NERC’s guidance on this topic.</p> <p>The AESO will accept a statutory declaration, confirming that the third party is unaffiliated, as acceptable evidence and will revise the measure accordingly.</p>
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