

# Information Document

## Variance Requests Under CIP-SUPP-001-AB1

### ID #2015-005RS



Information Documents are not authoritative. Information Documents are provided for information purposes only and are intended to provide guidance. In the event of any discrepancy between an Information Document and any Authoritative Document(s)<sup>1</sup> in effect, the Authoritative Document(s) governs.

#### 1 Purpose

This Information Document relates to the following Authoritative Document:

(a) CIP-SUPP-001-AB1, *Cyber Security – Supplemental CIP Alberta Reliability Standard*

The purpose of this document is to: (1) provide information relating to Variance Requests under CIP-SUPP-001-AB1, including contact information; (2) describe the AESO's process for reviewing and determining variances requested under CIP-SUPP-001-AB1, and (3) provide a link to the AESO's Variance Request Report.

#### 2 Contact Information

Variance requests under requirement R1 of CIP-SUPP-001-AB1 may be submitted by email to the AESO at [RFI@aeso.ca](mailto:RFI@aeso.ca).

#### 3 Grounds of the Request

Requirement R1 specifies that the grounds in support of the variance request must not be frivolous or of little merit. Any application that would frustrate the purpose of the CIP ARS will be dismissed.

#### 4 Material Impact on Reliability

In accordance with requirement R4, a variance granted under CIP-SUPP-001-AB1 must not have a material impact on the reliability of the Alberta interconnected electric system. The AESO expects variance requests to be very rare and that any Responsible Entities seeking a variance will have taken all steps (or be prepared to take all steps) necessary and appropriate to mitigate any reliability impacts associated with the variance.

In each case where a variance request is made, the AESO will undertake an assessment to identify and evaluate any and all impacts to the reliability of the system associated with the requested variance. Given that the AESO is responsible for the safety and reliability of the Alberta interconnected electric system, variances will only be granted in circumstances where the impacts to the reliability of the system as a whole are minimal, and where there are appropriate mitigation measures available to recover from any such impacts.

As the scope of Responsible Entities and the facilities (including their specific location on the system) in respect of which the Critical Infrastructure Alberta reliability standards ("CIP ARS") apply are broad, it would not be appropriate in this context to establish a one-size-fits-all materiality threshold.

#### 5 Time for Processing of a Request

The AESO conducts an appropriate case-by-case assessment of the particular facts and circumstances of each variance request and therefore the processing times for each request will vary. The CIP ARS are new to Alberta, and the AESO's and market participant's experience with them is at an early stage.

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<sup>1</sup> "Authoritative Documents" is the general name given by the AESO to categories of documents made by the AESO under the authority of the *Electric Utilities Act* and regulations, and that contain binding legal requirements for either market participants or the AESO, or both. AESO Authoritative Documents include: the ISO rules, the Alberta reliability standards, and the ISO tariff.

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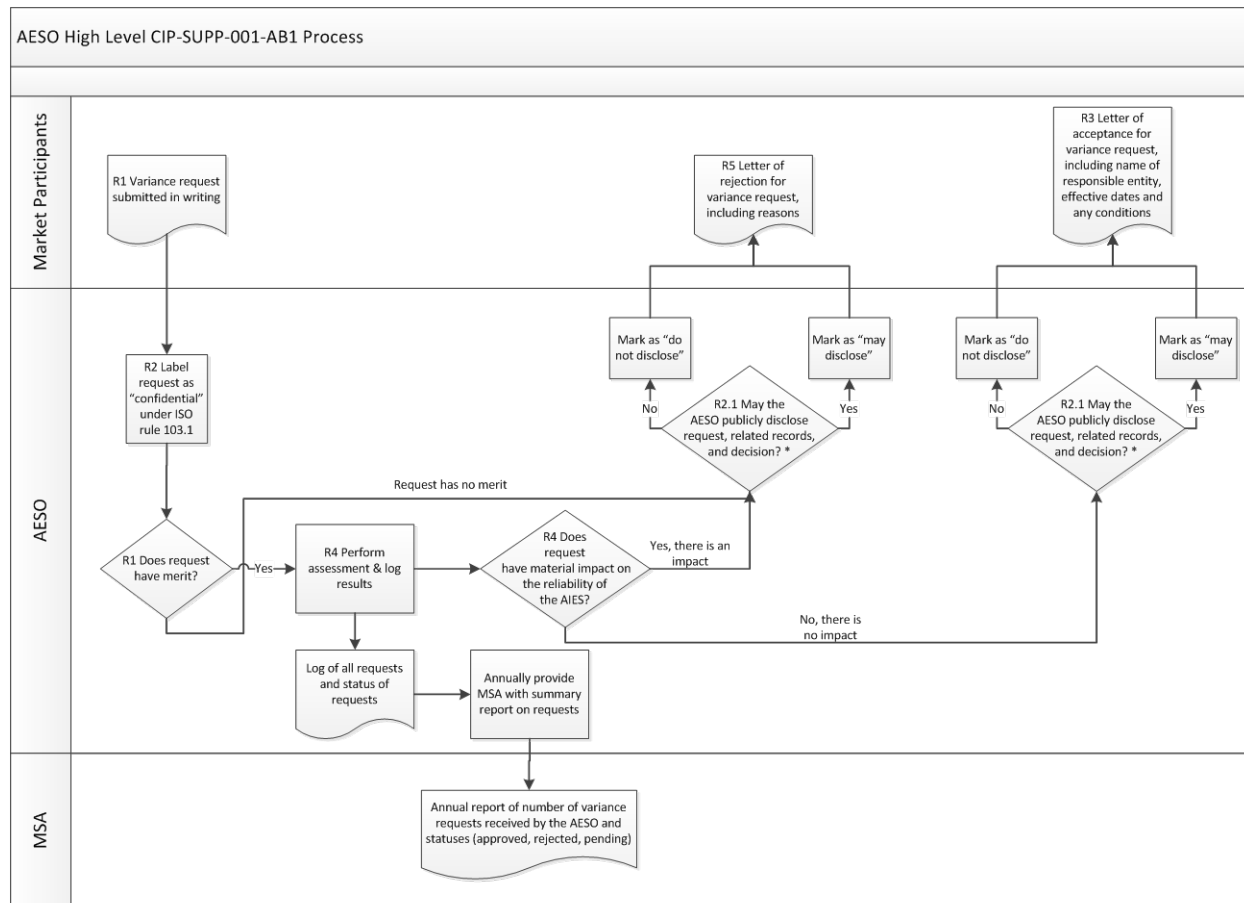
## 6 Variance Request Report

The AESO's variance request report will contain information regarding the number of variance requests received, accepted, rejected or pending in a calendar year. The report will be located on the AESO's [website](#) or by the following path: Rules, Standards and Tariff > Alberta Reliability Standards > CIP-SUPP-001 Cyber Security – Supplemental CIP Alberta Reliability Standard, and will be updated annually in January for the previous calendar year, beginning in January 2017.

## 7 Variance Process

Figure 1 below depicts the AESO's process for reviewing and considering variance requests:

**Figure 1 – AESO Variance Process**



\* The AESO may disclose if the answer to both the following questions is no:

- a) Would the disclosure of this request, records related to the request and variance granted have a material impact on the reliability of the AES?
- b) Are the request, records related to the request and variance granted commercially sensitive?

## Revision History

Posting Date	Description of Changes
2017-03-21	Amendments to the ARS number, the website link and the AESO's email address.
2015-12-08	Initial Release