

Critical Infrastructure Stakeholder Oversight

Issue Source

Brought by the Office of the People's Counsel for the District of Columbia in response to the August 12, 2019 notice by the PJM Transmission Owners ("TOs") of their intent to file a new Attachment M-4 to the PJM Tariff ("Tariff") for the planning of CIP-014 Mitigation Projects ("CMPs").

Issue Content

This work effort is designed to consider whether the development of Tariff, Operating Agreement ("OA"), and Manual language is needed to address ~~both the CMPs referenced in the August 12, 2019 notice and future~~ CIP-014 facility avoidance and mitigation through planning processes and criteria as well as the need to maintain appropriate confidentiality consistent with NERC and CEII requirements~~listed and other security impacted facilities.~~

Key Work Activities and Scope

- Provide education on NERC Reliability and Resilience requirements; how and when CIP-014 information gets factored into PJM's models; issues related to managing confidential or sensitive information; and current TO/PJM process(es) for managing CIP-014 compliance including models to determine that identified facilities could have a critical impact on the operation of the interconnection.
 - Provide education and evaluation regarding the circumstances and models that require additional system resiliency beyond NERC CIP-014 physical security requirements.
 - Evaluate ~~whether~~ procedures that provide stakeholder oversight: ~~of CMPs and CIP-014 facilities are appropriate, including discussion of whether protecting necessary confidentiality is possible.~~
 - Consider the development of a non-disclosure agreement (NDA) applicable to all situations. The NDA will contain all necessary provisions including in person only access and other required restrictions for facilities that qualify under CIP-014;
 - Develop CEII consistent protocols for stakeholder oversight of facilities with a high probability of qualifying as CIP-014 facilities without appropriate avoidance or mitigation planning; and
 - Consider mechanisms to provide notice to government agencies (e.g. public utility commission) of a CIP-014 mitigation or avoidance planning and to provide notice to stakeholders when a government entity is denied access to material.
- Best practices from other organizations, including NERC and other RTOs, will be reviewed.
- Review both the challenges and benefits of utilization of the existing regional planning processes and competitive windows to address CIP-014 ~~mitigation~~list removal or avoidance in recognition of the potential for multi-zonal and regional impact of CIP-014 facilities and their system reliability and public policy benefits.
 - Evaluate and discuss the development of a new category of transmission planning to address ~~both the current CMPs and future~~ CIP-014 facility avoidance and mitigation.
 - Identify and establish PJM's role in the evaluation of potential solutions as well as any alternatives PJM independently determines provide a more efficient or cost-effective approach to address ~~both the current CMPs and future~~ CIP-014 facility avoidance and mitigation.
 - Consider whether separate metrics should be developed for the evaluation of ~~CMPs and future~~ CIP-014 facilities, including, but not limited to:

- Proposed project costs will mitigate or offset costs associated with maintaining physical security for ~~facilities on the~~ CIP-014 facilities list;
- Proposed project will achieve a certain level of consequence reduction;
- Solution is not or cannot be addressed through regional transmission planning criteria; and
- Solution is not or cannot be addressed through non-transmission alternatives or remedial action.
- Examine the impact of ~~CMPs and future~~ CIP-014 facilities on other PJM work efforts including, but not limited to, regional transmission planning, fuel security, and generation interconnection queue.
- To encourage productive and collaborative engagement among all stakeholders, meetings will focus on developing processes and planning criteria to address CIP-014 facility avoidance and mitigation and to maintain appropriate confidentiality consistent with NERC and CEI requirements. Only upon completion of a single proposal or multiple alternatives will stakeholders address applicability and implementation timing of any proposal or alternative.

Expected Deliverables

Any needed implementing Tariff, OA, and Manual language.

Decision-Making Method

Tier 1, consensus (unanimity) on a single proposal (preferred default option), or Tier 2, multiple alternatives.

Stakeholder Group Assignment

This work will be assigned to the Planning Committee (“PC”) or a special subgroup of the PC as needed.

Expected Duration of Work Timeline

Six (6) months under current assumptions.

Charter

(check one box)

<input type="checkbox"/>	This document will serve as the Charter for a new group created by its approval.
<input checked="" type="checkbox"/>	This work will be handled in an existing group with its own Charter (and applicable amendments).