

# Reliability Standards Standing Committee (RSSC)

## Meeting Minutes – 2019 Q4 RSSC Meeting #47

<b>Date:</b> November 25, 2019	<b>Time:</b> 9:30am – 3:00 pm
<b>Location:</b>	IESO H.O., 120 Adelaide St. West, Suite 1600, Toronto
<b>Meeting Sponsor:</b>	Tam Wagner
<b>Meeting Chair and Facilitator:</b>	Scott Berry
<b>Scribe:</b>	Sean Lagan

Meeting Objectives: To update members regarding IESO's on-going activities in the areas of reliability standards development, compliance monitoring and regulatory affairs and to solicit stakeholder feedback.

Action required: Attendees are asked to download and review meeting materials posted on the [RSSC Webpage](#) prior to the meeting.

### 1. Welcome and Introductions

Scott welcomed guests to what is the 47<sup>th</sup> meeting of the committee, thanked attendees, took attendance, and provided a safety moment

### 2. Administrative Issues

Attendance was taken (provided at the end of the minutes).

Those who attended on phone were asked to provide confirmation to Sean Lagan (sean.lagan@ieso.ca) to be recorded.

- a. The agenda was reviewed and the following changes were completed;
  - The CIP Update will be delivered by Rob Antonishen rather than David Dunn.
  - Cristian Dragnea and Monica Adam both will deliver the MACD Activities UpdateThe changes were agreed to

The changes were completed, and the agenda was accepted as final.

- b. The minutes of the RSSC Q3 meeting were reviewed by exception.

The minutes were approved as final and will be updated on the RSSC webpage.

- c. Open action items from the RSSC Committee were reviewed.

Updates from the Q3 meeting have been highlighted below.

New action items from the Q4 meeting are added in the next meeting section of the document.

RSSC Action Items as of the end of Q3 2019 Meeting				
Action Item ID	Action Item	Status update Q3 Meeting Status Update is highlighted Historical updates remain below for context.	Status	Assigned To
2019-02-01	Revised RSSC Terms of reference	<p>The RSSC TOR changes and proposed TOR for the Cyber Security Group will be presented on in today's Q3 meeting as item 11.</p> <p>The item will carry forward to the Q4 meeting where the drafted changes will be proposed for approval.</p>	Open	S. Berry
2019-01-01	<p>RAS and SPS Discussion: The IESO and Hydro One have discussed that the definition of RAS accounts for Type 1 and 2 SPS, but Type 3 still lacks clarity. Low impact RAS are in the category of Type 3. SPS that do not have BES impact must also be considered. H1 and IESO are working to come to an agreement and will eventually take these conversations to NPCC. The IESO to provide an update on this at next RSSC.</p>	<p>Update at Q3 meeting: The IESO is still awaiting confirmation from NPCC.</p> <p>NPCC is still working through the process with changes still pending.</p> <p>Presently regional entities across NERC are developing positions.</p> <p>Update at the Q2 meeting: TFSP has been meeting on it. Will be an update at next meeting (RSSC Q3 2019). NPCC are still working to classify which Type 3 that are in scope. (if RAS is type 3, it will be in scope)</p>	Open	H. Lainis
2019-01-03	At the Q1 2019 meeting, IESO Performance Validation and Models, Manager Steve Burns provided an update on MOD	<p>Update at Q3 Meeting: The IESO is still working internally to get approval to move forward with the</p>	Open	IESO

	and PRC reporting obligations of participants. Steve spoke about a potential pilot project being available where the IESO could potentially coordinate the testing and submission of data for the MP. Steve will research the viability and provide an update at RSSC #46	pilot project, and will provide an update at the Q4 meeting.  Update at Q2 Meeting: PV&M is still investigating the viability of this pilot project. An update will be available for the Q3 2019 meeting.		
2019-01-02	IESO to coordinate a presentation with Alicia from Hydro One to present to RSSC on the implications of the NPCC A-10 Criteria reviews	Item will be presented on in today's meeting	Closed	S. Berry

d. Roster Updates since Q3 meeting.

Action	Name	Company
Add	Sanju Samuel	Transalta
Add	Mansour Jalali	Kinectrics

### 3. RSSC Survey Results

At the forty-sixth RSSC Meeting, a survey was conducted by the IESO. The survey was designed to collect feedback from meeting participants regarding IESO's delivery/performance on RSSC communication and committee processes.

The consensus results of the survey indicate a general level of satisfaction from RSSC participants.

Leading into our next agenda item, Scott Berry encouraged to participants to continue to bring forward areas of interest that they would like to have presented on at the committee meeting, as well as ideas on how the RSSC can better serve Market Participants.

### 4. Topics for 2020 RSSC meetings

Committee members provided the following suggestions for possible agenda items in 2020.02.24

- Ontario Resource and Transmission Assessment Criteria
  - Planning criteria methodology and the connection to NPCC Criteria and NERC Standards
- Discussions around the confidentiality of possible CIP violation reporting
- CIP Virtualization

- Standard development
- The development of internal controls
- Internal Compliance Programs
  - Industry best practices
  - Successes and failures
- EMP's
- Challenges around managing third parties and CIP requirements

## 5. CIP Standards Development Update

Rob Antonishen provided the CIP Standards Updates on CIP developments within NPCC and NERC.

The key points included

### CIP Modifications SDT (Project 2016-02).

CIP-002-6 comment period open (Nov 1-Dec 16)  
 Rollback of planned/unplanned modifications  
 To be balloted Dec 6 - Dec 16

CIP-005-7 comment period closed (Sept 26)  
 Virtualization Updates for CIP-005 and Associated Definitions  
 Expected posting late November or December

### Communications between Control Centers

CIP-012-1 FERC NOPR (Notice of Proposed Rulemaking) April 18, 2019  
 Control Center definition for this Standard  
 Responsible Entities  
 BA, GOP, GO, RC, TOP, TO  
 Excludes “real-time data specification elements” (see TOP-003 and IRO-010)

### Incident Reporting and Response Planning (Project 2018-02)

CIP-008-6 - Expected applicable Jan, 2021  
 New “Reportable Cyber Security Incident” definition (See NERC Glossary)  
 Entity gets to define “attempt to compromise”  
 Submit notification to NCCIC & E-ISAC (IESO in Ontario)  
 “Suggestion” that a mature cyber security program should include PCAs

### Supply Chain Risk Management (Project 2019-03)

CIP-013-1, CIP-005-6 and CIP-010-3  
 Applicable July 1, 2020  
 It is recommend to engage with procurement & legal

CIP-005: New remote vendor access requirement  
CIP-010: New requirement to verify patch integrity  
NERC 1600 Data Request

## 6. Lessons Learned

Hamad Shahbaz presented on the two lessons learned posted on the NERC website since the Q23 RSSC Meeting.

(Please see the slides provided in the meeting materials for additional details).

- 1 Transmission Facilities that is applicable to TOP/TO/GOP/GO
- 1 Communication related, that is applicable to TOP/TO/GOP/GO/DP/RC/BA

## 7. Standards Enforcement Dates Update/Roadmap

Hamad Shahbaz provided the Standards Enforcement Dates Roadmap.  
The Roadmap is posted online in the Meeting Materials section of the RSSC webpage.

## 8. MACD Activities and CMP Status Update

Cristian Dragnea provided a review of the 2019 Compliance Monitoring Plan and Provided a forward look into the 2020 plan.

Best practice from the 2019 CMP included

- RSAWs and IESO Guided SC Worksheets are provided in the response
- Referenced documents are provided as part of the evidence
- Provided evidence to support compliance statement
- Responded clearly to questions asked in MACD's additional information requests

Some observations from the 2019 program that offer an opportunity for improvement

- Submissions did not include a completed RSAW or an alternative compliance narrative;
- Documents provided were not dated, signed, and did not cover the entire reporting period;
- MACD Additional Self-Certification Information request and Additional Self-certification
- Questionnaire were responded to partially or not at all

Cristian Dragnea provided an overview for the 2020 CMP.

The 2020 CMP will be posted by the end of 2019 and will be available on the ORCP webpage.

The document will list the reliability standards (NERC reliability standards, NPCC criteria and Ontario market rules) to be the focus of MACD's compliance monitoring activities in 2020.

Market Participants can expect to receive self-certifications as early as Q1 2020; Selected market participants will receive notification, via the reliability compliance tool or the MACD Compliance Monitoring collaboration community;

NERC RSAW will accompany the self-certification request for a specific reliability standard; participant is expected to submit the completed RSAW or a narrative on how it meets compliance (refer to the "Compliance Assessment" section of the RSAW for guidance);

Participant is expected to attach evidence of compliance (e.g. documented policies, procedures and plans, maintenance reports, etc.);

PRC-005-6 maintenance template is expected to be filled out and submitted as self-certification evidence.

Question: Can Market Participants use their own template rather than the MACD issued template.  
Cristian Dragnea: Yes, that is fine.

Question: Could we look to align the NPCC 120-day response, and the MACD 90-day response period?

Cristian Dragnea: Yes, this is something we can do.

Cristian Dragnea provided a demo of the upcoming Web Based Self Reporting Tool that will be available for Market Participants in December 2020.

This tool will replace the existing N.C.R form. There will be a transition period where both the form and the web based tool are available.

Ideally we will migrate the new NCR tool and the RCT tool into one tool.

The registered "Compliance Contact" in Online IESO will be the only persons in an organization with access to the new tool. Participants should ensure their contact and their contact information is up to date.

### ORCP Manual Revisions

The ORCP manual has been re-drafted.

The manual has taken content from the CMEP program and the existing model (designed around IRA practices).

The manual will include details around self-certifications, reliability monitoring & compliance framework, and compliance oversight plans.

The 2020 CMEP will be province wide.  
1 pilot for 1 market participant on the IRA.  
Once this process is solidified, MACD will move away from the CMEP to the individual IRA.

The revised manual will be posted at the beginning of December 2020.

## 9. NERC Standards Development and NPCC Standards Developments Update

### Modifications to PRC-024-2 -Generator Frequency and Voltage Protective Relay Settings

Additional Ballot for the 2nd draft was concluded on November 4, 2019.

Ballot passed with 86.67% industry approval.

Major changes to the 2nd draft included:

Removed Transmission Owner from the Applicability

Added an exemption to the Applicability: all auxiliary equipment and associated protection

Replaced the 0.1 second 'Minimum Time (Sec)' value with 'Instantaneous'

Final Ballot scheduled for December 2019

### Modifications to NERC TPL-007 -3 GMD Planning Standard

Final Ballot concludes November 22, 2019.

Recap of proposed modifications:

- (1) require the development and implementation of corrective action plans to mitigate assessed supplemental GMD event vulnerabilities
- (2) Authorize extensions of time to implement corrective action plans on a case-by-case basis
- (3) Canadian variance kept in tact

### Standard Authorization Request – Cold Weather

On October 10, 2019, NERC issued the SAR for comments due November 5, 2019

The SAR was developed and submitted by SPP to address Recommendation 1 in the 2019 FERC and NERC Staff Report: The South-Central United States Cold Weather BES Event of January 17, 2018

It will include the development of a new or revised NERC Reliability Standard to consider such activities as:

- winterization activities on generating units,
- winter-specific and plant-specific operator awareness training, and
- processes to ensure situational awareness for the registered functions

## Modifications to BAL-003-1.1 Frequency Response and Frequency Bias Settings

Final Ballot passed on October 24, 2019

The modifications related to the first phase of this project and focused on some minor administrative changes related to Interconnection Frequency Response Obligation (IFRO) and Resource Loss Protection Criteria and modifications to the Frequency Response Survey Form.

Once this is approved by FERC, the Frequency Response Measurement and the IFRO for the Eastern Interconnection will decrease in steps as performance is reviewed for any degradation due to perturbations.

Second phase of this project may deal with adding requirements to the Generator Operators/Owners

Helen also covered the administrative modifications to NERC Standards since the last RSSC meeting. The projects included Standards Alignment with Registration, and Technical Rationale for Reliability Standards. Please see the meeting materials for detailed notes around the proposed revisions.

## NPCC Criteria Developments

### Status of RAS Implementation/Transition

TFCP and TFSS continue review of Directory#7 Appendix B to conform to RAS definition for regional review.

TFSP continues review of Directory#7 to conform with PRC -012

### A-10 Classification of BPS Elements - Status of TFCP review

Second Open Process comment period concluded on October 10, 2019.

CP-11 will draft comment responses and revise draft A-10 as required

CP-11 will submit draft to the TFCP at the mid November TFCP meeting.

Pending TFCP approval, revised A-10 will be presented to the RCC and a subsequent approval ballot by the Full Member Committee.

### Directory Manual --- Cost Effective Revisions

RSC Review of Open Process Comments - Posting Closed October 11, 2019

RSC approved revisions

### Cost Effective Pilot ---- Directory #4 and Directory#5

TFSP and TFCO have completed a cost-effective survey of the individual criteria attributes in Directory#4 System Protection Criteria and Directory#5 Reserve

### Full Member Ballot Directory #5 and Directory #6

Full Members approved criteria revisions on September 30, 2019.

## C-33 Retirement

TFSS retirement recommendation Open Process posting concluded on October 12, 2019  
TFSS to consider retirement action item at its November meeting

## **10. Update on NERC Standards Committee Activities**

Dave Kiguel provided the update on recent activities from the NERC Standards Committee.

The next Standard Committee meeting will be in December 18, 2019.

Dave provided a recap of the 2020-2022 Reliability Standards Development Plan  
The SC has Endorsed the 2020-2022 Reliability Standards Development Plan (RSDP).

Dave noted that many of the details around Cold Weather SAR and Standards Alignment with Registration were covered in Item 9.

Project 2019-02 BES Cyber System Information Access Management  
Appointed supplemental members, chair, and vice chair to the SDT

- No Canadians in the current SDT
- No Canadians appointed in the supplemental slate.

Project 2019-03 Cyber Security Supply Chain Risk Management  
Accepted revised SAR after consideration of comments received;

- Authorized drafting revisions to the Reliability
- Standards identified in the SAR; and
- Appointed SAR DT as the SDT
  - o Member: Parisa Mahdian (OPG)

Project 2019-05 Modifications to PER-003-2 Operating Personnel Credentials  
Appointed members, chair, and vice chair to the SAR DT.

- Brett Hallborg (BC Hydro appointed as Chair)

Project will revise PER-003-2 to reflect the proposal that one credential be required, instead of the four credentials currently provided in the standard.

While addressing comments the SDT identified a potential administrative burden for operators by SOL exceedances requiring additional logging and notification.

As a result, the SDT decided to revise FAC-011 Requirement R6 language to address the issue and not make revisions to the TOP-001 and IRO-008 standards.

## Functional Model

Endorsed, as historic documents, the Functional Model (FM) and Functional Model Technical Document (FMTD) versions 5.1 with an added statement clarifying usage, and authorized posting on NERC website; and Disbanded the Functional Model Advisory Group (FMAG).

Project 2019-02 BES Cyber System Information Access Management  
The standards Committee accepted a “corrected SAR”

*“The current Requirements are focused on access to the “storage location”, but should ~~not~~ consider management of access to BCSI while in transit, storage, and in use.”*

See “Item 10” meeting materials for specific details to each NERC project

## **11. Key Facilities/EPP/RPA Update – Scott Berry**

The IESO has responsibility under PCC Directory#8 to notify market participants of all critical facilities, and all owners of critical equipment (so the MP can identify the critical components).

There is no obligation for the IESO to request this list (critical components) from market participants.

However, market participants should ensure they have this list (even without a request from the IESO for this list).

The IESO will issue self certifications in December 2019 for EPP [Form 1608] and KPA [Form 1601]. Market participants will have 45 days to respond.

For EAP;

- Ensure the list is reviewed
- Do not submit the list through the RCT
- All changes must be communicated through the registration process.

## **12. Review Terms of Reference for CSSC, and revised RSSC Terms of Reference - Scott Berry**

The Terms of Reference for the CSSC will be finalized in Q1 of 2020. Once these revisions are complete we can continue to develop the RSSC TOR.

## **13. OPSRP/Restoration Workshops 2020 Update**

In 2020 the IESO will host 5 Workshops;

March 26 - Ajax

April 23 – Niagara

May 21 – Thunder Bay

June 11 - Kincardine

Oct 29 – London

The OPSRP Document is underdoing its annual review. Any changes are expected to be minor in nature.

There is question around the allocated review time for market participants (in general). The thought is that a two-week revision period does not give enough time to engage with stakeholders and provide meaningful feedback to the IESO. The IESO reps will take this feedback to SMEs involved in the Baseline Document Management process to see what could possibly be done.

#### **14. Milestones Spreadsheet Update – S Lagan**

2020 postings will now include NPCC and NERC data.

Market Participants are encouraged to provide feedback on the reports to [sean.lagan@ieso.ca](mailto:sean.lagan@ieso.ca)

#### **15. MP Lessons Learned from Self-Cert/Audits (Group Discussion)**

This was a participant lead discussion around previous experience with Self-Certifications and Audits highlighting the importance of transparency, promoting a culture of compliance, and working to improve (rather than finding blame).

Another key point is around the importance of compliance being an ongoing item. If you struggle to gather evidence, it will look bad in front of an auditor. This will result in increased scrutiny. Be diligent and complete in submitting self-certifications.

#### **(Added Item) 16. NERC Generator Frequency Response Summary – Kurtis Chong/Tracey Zhou**

The exercise was first conducted in 2017.

This is the second time conducting the survey. Participation is volunteer.

The survey will be issued before December 31, 2019.

Responses can be submitted up until January 14, 2020. The IESO will provide the submission to NERC by January 17, 2020.

Kurtis Chong noted that while the participation in the survey is volunteer, participants must identify themselves to the IESO. If a participant wishes to remain anonymous when the data is forwarded onto NERC, indicate that in your submission and we will ensure confidentiality.

#### **Future RSSC Meetings**

The dates for the 2020 INIC meetings were agreed to

Q1 – March 5

Q2 – June 4

Q3 – Sept 10

Q4 – Nov 26

**Meeting Adjourned at 2:20 pm**

## RSSC Action Items as of the end of the Q4 RSSC Meeting

Action Items From RSSC Q2 2019 Meeting				
Action Item ID	Action Item	Status update Status at the end of the Q4 RSSC Meeting.	Status	Assigned To
2019-04-1	MACD to look at aligning MP response time of 90 days with NPCC 120 days		Open	Cristian Dragnea
2019-02-01	Revised RSSC Terms of reference	<p>The RSSC TOR changes and proposed TOR for the Cyber Security Group will be presented on in today's Q3 meeting as item 11.</p> <p>The item will carry forward to the Q4 meeting where the drafted changes will be proposed for approval.</p>	Open	S. Berry
2019-01-01	<p>RAS and SPS Discussion:</p> <p>The IESO and Hydro One have discussed that the definition of RAS accounts for Type 1 and 2 SPS, but Type 3 still lacks clarity. Low impact RAS are in the category of Type 3. SPS that do not have BES impact must also be considered. H1 and IESO are working to come to an agreement and will eventually take these conversations to NPCC. The IESO to provide an update on this at next RSSC.</p>	<p>Update at Q3 meeting: The IESO is still awaiting confirmation from NPCC.</p> <p>NPCC is still working through the process with changes still pending.</p> <p>Presently regional entities across NERC are developing positions.</p> <p>Update at the Q2 meeting: TFSP has been meeting on it. Will be an update at next meeting (RSSC Q3 2019). NPCC are still working to classify which Type 3 that are in scope. (if RAS is type 3, it will be in scope)</p>	Open	H. Lainis
2019-01-03	At the Q1 2019 meeting, IESO Performance Validation and Models, Manager Steve Burns provided an update on MOD and PRC reporting obligations of participants. Steve spoke about a potential pilot project	<p>Update at Q3 Meeting:</p> <p>The IESO is still working internally to get approval to move forward with the pilot project, and will provide an update at the Q4 meeting.</p>	Open	IESO

	being available where the IESO could potentially coordinate the testing and submission of data for the MP. Steve will research the viability and provide an update at RSSC #46	Update at Q2 Meeting: PV&M is still investigating the viability of this pilot project. An update will be available for the Q3 2019 meeting.		
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<b>Meeting Chair and Facilitator:</b>	Scott Berry
<b>Scribe:</b>	Sean Lagan

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Action required: Attendees are asked to download and review meeting materials posted on the [RSSC Webpage](#) prior to the meeting.

Time	Agenda Item	Responsible Party	Expected Actions
9:00	<b>Coffee/Breakfast</b>		
9:30	<b>1. Welcome and Introductions</b>	S. Berry	
9:35	<b>2. Administrative Issues</b> a. Review 47th Meeting Agenda b. Review and Approval of Minutes from 46th meeting c. Update on “Open” Action Items d. RSSC Roster Update	S. Berry	Approve and decide  Information and Discussion
<b>Standing Items</b>			
9:50	<b>3. Survey Results</b>	S. Berry	Information and discussion
10:00	<b>4. Topics for 2020 RSSC meetings</b>	S. Berry	Discussion
10:20	<b>5. CIP Standards Development Update</b>	D. Dunn	Information and discussion
10:30	<b>6. NERC 2019 Lessons Learned</b>	H. Shahbaz	Information and discussion
10:40	<b>7. Standards Enforcement Dates Update/Roadmap</b>	H. Shahbaz	Information and discussion
10:50	<b>BREAK</b>		
11:00	<b>8. MACD Activities</b> <ul style="list-style-type: none"> <li>• CMP Status Update</li> <li>• Market Manuals</li> </ul>	M. Adam	Information and discussion
11:20	<b>9a. NERC Standards Development</b> <b>9b. NPCC Standards Development</b>	H. Lainis	Information and discussion

Time	Agenda Item	Responsible Party	Expected Actions
11:45	10. Update on NERC Standards Committee Activities	D. Kiguel	Information and discussion
12:00	<b>LUNCH BREAK</b>		
<b>Open Items</b>			
1:00	11. Key Facilities/EPP/RPA Update	S. Berry	Information and discussion
1:45	12. Review ToR for Cyber Forum WG , and revised RSSC ToR	D. Dunn	Information and discussion
2:15	13. OPSRP/Restoration Workshops 2020 Update	A.Tschirhart	Information and discussion
2:25	14. Milestones Spreadsheet Update	S. Lagan	Information and discussion
2:30	15. MP Lessons Learned from Self-Cert/Audits	All	Discussion
2:55	Next Meeting	S. Berry	Information and discussion
3:00	Adjourn	All	Information and discussion