

Critical Infrastructure Stakeholder Oversight

Issue Source

Brought by the Office of the People's Counsel for the District of Columbia in response to FERC's March 17, 2020 Order approving Attachment M-4 to the PJM Tariff ("Tariff") for the planning of certain CIP-014 Mitigation Projects ("CMPs") and the failure of the Planning Committee ("PC") to timely address the outstanding issues related to CIP-014 facilities.

Issue Content

This work effort is designed to consider whether the development of Tariff, Operating Agreement ("OA"), and Manual language is needed to address CIP-014 facility avoidance and mitigation through planning processes and criteria.

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.
- Education covered in the special PC sessions would be transferred to MRC stakeholder group.
- Evaluate potential procedures that provide stakeholder oversight and transparency of CIP-014 facilities while adhering to all required NERC confidentiality protocols. 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 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 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 CIP-014 facility avoidance and mitigation.
- Consider whether separate metrics should be developed for the evaluation of CIP-014 facilities, including, but not limited to:
 - Proposed project costs will mitigate or offset costs associated with maintaining physical security for CIP-014 facilities;
 - 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 CIP-014 facilities on other PJM work efforts including, but not limited to, regional transmission planning, fuel security, and generation interconnection queue.

- Facilities that are covered under FERC’s March 17, 2020 Order and for whom substantial mitigation work has been undertaken at the time of approval of any need implementing Tariff, OA, and Manual language will be exempt from such implementing language.
- Work completed in the special PC sessions, including the development of a matrix, would be transferred to MRC stakeholder group.
- Approval of this Issue Charge would sunset and supersede the activities of the PC.

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 a senior task force reporting to the Markets and Reliability Committee.

Expected Duration of Work Timeline

Packages and proposals will be reported for a first read no later than the November MRC.

Charter

(check one box)

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