

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").

Subsequently, FERC approved the TOs' Attachment M-4 filing without modification and with an effective date of March 17, 2020. Given the Attachment M-4 process is in effect and addresses the mitigation of existing CIP-014 substations in PJM, this Issue Charge is modified to focus discussions on 1) the feasibility of developing ~~on~~ planning processes that would avoid the creation of new CIP-014 facilities, and 2) the process that would handle mitigation of future CIP-014 facilities.

Issue Content

This work effort is designed to consider whether the development of Tariff, Operating Agreement ("OA"), and Manual language regarding how to modify transmission planning is needed to address the inadvertent creation of both the CMPs referenced in the August 12, 2019 notice and future CIP-014 facilities listed and the process that would handle mitigation of future CIP-014 facilities ~~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. Best practices from other organizations, including NERC and other RTOs, will be reviewed.~~
- Evaluate whether procedures are appropriate for stakeholder review of measures to avoid a transmission facility from becoming a future CIP-014 facility and of the process that would handle mitigation of future CIP-014 facilities considering NERC confidentiality requirements and best practices from other RTOs.
- Review both the challenges and benefits of utilization of the existing regional planning processes and competitive windows to address CIP-014 ~~facility list removal or~~ avoidance and the process for mitigation of future CIP-014 facilities 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 1) the development of a new category of transmission planning to address both the current CMPs and future CIP-014 facility avoidance, and 2) the process for mitigating future CIP-014 facilities.
- 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 in the process for mitigating future CIP-014 facilities.~~

- ✓ Consider whether separate metrics should be developed for the evaluation of [measures to avoid ~~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 [potential CIP-014 facilities](#) ~~on the CIP-014 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~~ [the processes for CIP-014 facility avoidance and for mitigating](#) future CIP-014 facilities on other PJM work efforts including, but not limited to, regional transmission planning, fuel security, and generation interconnection queue.

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).