PJM Support of CIP-002 and CIP-014 Reviews

Presentation to PJM Planning Committee

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Objective

• Propose a standard process for PJM review and communication related to NERC CIP-002 and CIP-014 Standards. Parts of CIP-002 and CIP-014 include provisions where PJM as Transmission Planner or Reliability Coordinator can specify that assets are in scope for these two standards that otherwise would not have been in scope.
What Exists?

- PJM Compliance Bulletins *CB018 Standard CIP-002-5.1* and *CB018 Standards CIP-002-5.1* already specifies a high level process.
  - Addresses review per CIP-002, Attachment 1, 2.6 and CIP-014, 4.1.1.3.
  - States that PJM will perform this review at least once every 15 months. But there is no specified timeline that would indicate a specific time period when this review would be completed.
  - PJM Compliance Division will issue the NERC-registered Transmission Owner or Generator Owner a formal letter containing the specific facilities identified by PJM related to CIP-002, Attachment 1, 2.6 and CIP-014, 4.1.1.3.
Related CIP-002 and CIP-014 Requirements

• CIP-002 and CIP-014 requirements for which PJM may facilities in scope
  – CIP-002-5.1 – Attachment 1, 2.3 (Note: While this relates to generation facilities, PJM should notify interconnecting TO at same time as Generator Owner as the TO would need to protect interconnecting facilities per CIP-002-5.1 – Attachment 1, 2.8)
  – CIP-002-5.1 – Attachment 1, 2.6: For facilities at a single station or substation location that are critical to the derivation of an IROL
  – CIP-002-5.1 – Attachment 1, 2.9: Would PJM review SPS’s for impact on IROL’s if SPS was destroyed, degraded or misused?
  – CIP-014 – Applicability section 4.1.1.3: For facilities at a single station or substation location that are critical to the derivation of an IROL.
Proposed Process

• Proposed PJM Assessment Process
  – Clearly define the standards and specific sections/requirements that PJM will review in their analysis. Proposed:
    • CIP-002-5.1 – Attachment 1, 2.3 (GO and TO)
    • CIP-002-5.1 – Attachment 1, 2.6 (TO)
    • CIP-002-5.1 – Attachment 1, 2.9 (TO)
    • CIP-014 – Applicability section 4.1.1.3 (TO)
  – Identify a specific timeline for review and notification.
Proposed Process Timeline

• Identify a specific timeline for review and notification.
  – This will enable TO’s and GO’s to schedule their CIP-002 annual reviews and CIP-014 reviews to be consistent with the PJM timeline.
  – PJM would provide a formal notification of completion of the analysis and findings. Unless exceptional circumstances emerge, there would not be any further notifications from PJM until the next review cycle.
  – An annual review would provide more consistency than a 15 month cycle. A 15 month review, as specified in the PJM Compliance Bulletins, would mean that the notification date would be at a different time of year each year.
    • An annual review will help ensure consistency with TO and GO work plans and budgets that would need to be initiated to mitigate any new assets that would come into scope as a result of the PJM review.
    • Could the PJM review be linked with other PJM annual studies (e.g. RTEP, others)?
Proposed Process Timeline

• Next steps
  – What is required to implement such a process/timeline??
  – Perhaps just a clarification of the existing compliance bulletins would be sufficient. Or maybe a modification to the PJM manual for study processes.
Questions?