

Second CISO Poll Results

Critical Infrastructure Stakeholder Oversight Meeting

October 20, 2020





Participation

Second CISO Poll was open Friday, October 2 through Friday, October 16

Member Type	Votes	Percent
Voting	15	15%
Affiliate	83	85%
Total	98	



1. Can you support the PJM package (CIP-014 Contingencies) for Mitigation? If no, please explain in the open feedback.



- Confidentiality protecting highly sensitive information is the #1 concern
- Competitive Process opening CIP-014 facilities to competition is not supported
- Baseline project criteria used to address possible CIP-014 facilities is not appropriate
- Overreach of PJM authority



2. Can you support the PJM package (Cascading Trees Analysis) for **Avoidance**? If no, please explain in the open feedback.



Open feedback for PJM Avoidance Proposal

- Additional discussion needed as confidentiality concerns remain
- Cascading Trees Analysis must replicate TO methodology for consistency

Question 3: Concerns and Feedback for either proposal

- Opposition to treating non-CIP-014 facilities with the same level of confidentiality as CIP-014 facilities.
- Pleased to see PJM take a more active role in the oversight of regional transmission projects and the addition of competition to the process.
- Neither proposal is modeled after the FERC approved M4, which should be the framework for addressing mitigation or avoidance.
- For Avoidance, PJM needs to clarify how it plans to address proposals that trigger potential violations associated with RTEP Resilience criteria.
- Concerns about PJM reach into TO authority. Avoidance mechanism is critical and mitigation is unlikely if avoidance is implemented properly.