



Critical Infrastructure Stakeholder Oversight

Planning Committee
December 1, 2020

- Original Issue Charge Approved at December 12, 2019 Planning Committee
 - Updated Issue Charge Approved on May 12, 2020
- PJM hosted 11 Special Session CISO meetings (January – October) to provide education and propose solutions for Mitigation & Avoidance of CIP-014 facilities
 - 2 non-binding polls for consensus were conducted in August and October
 - First read of Mitigation and Avoidance packages presented at the November 4 Planning Committee



Appendix



2nd Non-binding Poll 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.

- Yes – 17% (17)
- **No – 83% (81)**
- Abstain – (0)



Open Feedback for PJM Mitigation Package

- 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



Non-Binding Poll Results for Question 2

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

- **Yes – 98% (96)**
- No – 2% (2)
- Abstain – (0)



Open feedback for PJM Avoidance Package

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



Question 3: Concerns and Feedback for Either Package

- 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.

Facilitator:
Christina Stotesbury,
Christina.Stotesbury@pjm.com

Secretary: Joe Hay,
Joseph.Hay@pjm.com

SME:
Michael Herman,
Michael.Herman@pjm.com

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Member Hotline

(610) 666 – 8980

(866) 400 – 8980

custsvc@pjm.com