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”).

Issue Content

This work effort is designed to develop Tariff, Operating Agreement (“OA”), and Manual language, as required, to address both the CMPs referenced in the August 12, 2019 notice and future CIP-014 listed and 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 requirements.
- Evaluate procedures that provide required stakeholder oversight of CMPs and CIP-014 listed and other security impacted facilities while protecting necessary confidentiality.
- Review the utilization of the existing regional planning processes and competitive windows to address CIP-014 list removal or avoidance in recognition of the multi-zonal and regional impact of CIP-014 listed and other security impacted facilities and their system reliability and public policy benefits.
- Evaluate and discuss the development of a new category of transmission planning to address both the current CMPs and future CIP-014 list removal or avoidance and other security impacted 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 CIP-014 list removal or avoidance.
- Develop metrics for the evaluation of projects, including, but not limited to:
  o Proposed project costs will mitigate or offset costs associated with maintaining physical security for facilities on the CIP-014 list;
  o Proposed project will achieve a certain level of consequence reduction;
  o Solution is not or cannot be addressed through regional transmission planning criteria; and
  o Solution is not or cannot be addressed through non-transmission alternatives or remedial action.
- Examine the impact of CMPs, CIP-014 listed and other security impacted facilities on other PJM work efforts including, but not limited to, regional transmission planning, fuel security, and generation interconnection queue.
Expected Deliverables

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)

☐ This document will serve as the Charter for a new group created by its approval.
☒ This work will be handled in an existing group with its own Charter (and applicable amendments).