



PC Special Session: Critical Infrastructure Stakeholder Oversight Monthly Progress Report

MC Webinar
February 22, 2021

1. Critical Infrastructure Stakeholder Oversight

Issue Status

The Critical Infrastructure Stakeholder Oversight special session group has completed education and interest identification, and is in the process of presenting solution options in the matrix in two separate work streams that address 1. *Avoidance* of new CIP-014 facilities, and 2. *Mitigation* of CIP-014 facilities.

Target Completion

The original work plan targeted completion in July 2020, but additional special session meetings have been scheduled through September to allow for further discussion with internal and external parties.

Progress Update

The first meeting of this group was held on Monday, January 27. Stakeholders were given education on the NERC CIP 014-02 standard, and CEII protections. Stakeholders also had the opportunity to provide interests.

The second meeting was held on Wednesday, February 12. Additional education on the NERC standards review and approval process was provided, as well as an update on neighboring RTOs compliance with this NERC standard. Stakeholders continued to identify interests, and started to identify design components in the matrix.

The third meeting was held on Tuesday, March 3. Education on PJM's transmission planning resilience analysis was presented, and stakeholders presented new design components and solution options.

The fourth and fifth meetings were on April 3, and April 28, and PJM and Stakeholders presented solution options to address the critical infrastructure issue in two separate components: *Mitigation* and *Avoidance*.

The sixth meeting was held on May 21. PJM provided an update on confidentiality concerns and presented feedback on the *Mitigation* solution options that are listed in the Matrix.

The seventh meeting was held on June 19. PJM presented enhanced solution options to address the *Avoidance* component of the issue. PJM will move these options into a formal package for the next meeting on July 17.

The eighth meeting was held on July 17. PJM presented updates to the *Avoidance* package, and reviewed outreach with regional entities to address confidentiality concerns.



The ninth meeting was held on August 14. PJM presented a package to address the Mitigation component of the issue. Minor updates to the Advocates Mitigation package was presented. AMP presented package proposals to address both Avoidance and Mitigation. Following the meeting, a poll was sent to the PC to understand the level of support for the existing package proposals, and to determine if additional time and education on a new Max Cred proposal was needed. Upon reviewing the results of the poll, it was decided to postpone the first read of packages to allow for additional discussion at the Sept 22 CISO meeting.

The tenth meeting was held on September 22. PJM presented education on Maximum Credible Disturbance/Extreme Event Analysis to support the AMP packages. PJM reviewed small changes to the Mitigation package; no changes were made to the Avoidance package. During the meeting, the Consumer Advocates removed their packages in support of the PJM packages. Following the meeting, AMP removed their packages that used the Maximum Credible Disturbance approach for both Avoidance and Mitigation, and a second poll was sent to the Planning Committee to understand the level of support for the remaining PJM packages. The poll was open for two weeks, and closed on October 16. Poll results will be reviewed at the final Critical Infrastructure Stakeholder Oversight meeting on Oct. 20. A first read of the packages will be presented at the November PC, with an anticipated vote on the package at the December PC.

The eleventh and final Critical Infrastructure Stakeholder Oversight special session meeting was held on October 20. Results from the second poll were presented, and stakeholders had a final opportunity to ask questions and provide feedback on the two PJM package proposals that address Mitigation and Avoidance of future CIP-014-2 facilities. PJM presented a first read of these packages at the November 4 Planning Committee meeting, and will seek endorsement of the packages at the December 1 Planning Committee meeting.

A Critical Infrastructure Stakeholder Oversight update was given at the December 1 Planning Committee. In response to the FERC Order (Docket No. ER20-841-001) issued on November 19, 2020 Addressing Arguments Raised on Rehearing, PJM Legal provided an overview of how this Order affects the current PJM CISO Mitigation proposal. PJM also provided a first read of Manual language that address the Avoidance proposal. PJM will hold another special session of the PC in December and/or January to address the Mitigation component of the CISO issue in order to modify the Mitigation proposal and move both the Avoidance and Mitigation proposals together at the PC and MRC in 2021.

PJM hosted a joint special session of the PC to address both the Storage as a Transmission Asset (SATA) and Critical Infrastructure Stakeholder Oversight (CISO) issues on December 18, 2020. At this meeting, PJM presented updates to the CISO Mitigation package, including draft manual 14B and 14F language for stakeholder feedback. At the January 11 Planning Committee Meeting, PJM presented a first read of both the CISO Avoidance and Mitigation packages. Revisions to the manual language to address the Avoidance package were posted in redline, and the updated Mitigation process flow diagram was presented. Additional information on the CISO packages will be presented at the joint special session of the PC scheduled for Friday, January 22. Stakeholders will be asked to provide feedback on the CISO Avoidance language and Mitigation Operating Agreement Language (if applicable), in advance of a vote scheduled for the February 9 Planning Committee meeting.

At the February 9 Planning Committee, Michael Herman reviewed updates to the Critical Infrastructure Stakeholder Oversight proposals, including manual language. Stakeholders then voted on the packages to address both the Avoidance and Mitigation packages.



The Avoidance package and associated manual language passed with 77% support. There were 127 *yes* votes, 38 *no* votes, and 22 *abstentions*. When asked if stakeholders preferred the Avoidance package over the status quo, the vote passed with 61% support. There were 101 *yes* votes, 64 *no* votes, and 21 *abstentions*.

The Mitigation package passed with 61% support. There were 101 *yes* votes, 64 *no* votes, and 20 *abstentions*. When asked if stakeholders preferred the Mitigation package over the status quo, the vote passed with 60% support. There were 101 *yes* votes, 66 *no* votes, and 17 *abstentions*.

An additional special session of the Planning Committee to review Operating Agreement language associated with the Critical Infrastructure Stakeholder Oversight Mitigation proposal will be held on Friday, February 19 from 10:30 a.m. to 12:30 p.m. Once the OA language is finalized, it will be brought to the Markets and Reliability Committee for a first read in March and a vote in April.

Action Requested (if necessary)

No action requested at this time.