

Information Documents are not authoritative. Information Documents are for information purposes only and are intended to provide guidance. In the event of any discrepancy between an Information Document and any Authoritative Document(s)<sup>1</sup> in effect, the Authoritative Document(s) governs.

## 1 Purpose

This Information Document relates to the following Authoritative Documents:

- CIP-002-AB-5.1, *BES Cyber System Categorization* (“CIP-002-AB-5.1”);
- CIP-003-AB-5, *Security Management Control* (“CIP-003-AB-5”);
- CIP-004-AB-5.1, *Personnel & Training* (“CIP-004-AB-5.1”);
- CIP-005-AB-5, *Electronic Security Perimeter(s)* (“CIP-005-AB-5”);
- CIP-006-AB-5, *Physical Security of BES Cyber Systems* (“CIP-006-AB-5”);
- CIP-007-AB-5, *Systems Security Management* (“CIP-007-AB-5”);
- CIP-008-AB-5, *Incident Reporting and Response Planning* (“CIP-008-AB-5”);
- CIP-009-AB-5, *Recovery Plans for BES Cyber Systems* (“CIP-009-AB-5”);
- CIP-010-AB-1, *Configuration Change Management and Vulnerability Assessments* (“CIP-010-AB-1”);
- CIP-011-AB-1, *Information Protection* (“CIP-011-AB-1”); and
- CIP-PLAN-AB-1, *Implementation Plan for Version 5 CIP Security Standards* (“CIP-PLAN-AB-1”)

(collectively, the “CIP Standards”).

The purpose of this Information Document is to provide information on the use of the North American Electric Reliability Corporation’s (“NERC”) Critical Infrastructure Protection (“CIP”) Guidance Information, as published from time to time by NERC, in relation to the CIP Standards.

Note that the CIP Standards will become effective in accordance with the timelines set out in CIP-PLAN-AB-1.

## 2 Use of NERC Guidance Information for the CIP Standards

As with every Alberta reliability standard, each responsible entity is responsible for determining, for its facilities, what actions are necessary to meet the requirements in the CIP Standards.

The AESO generally agrees with the information contained within the NERC CIP Guidance Information and recognizes that it may be a useful reference for market participants as they implement the CIP Standards. In addition, the AESO may use the NERC CIP Guidance Information as reference material in assessing compliance with the CIP Standards where it determines that the Guidance Information is applicable.

## 3 Clarification Regarding Industrial Complexes

### 3.1 Generating Unit that is part of an Industrial Complex

Subsection 4.2.2.3.1. of the CIP Standards refers to a generating unit that is:

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<sup>1</sup> “Authoritative Documents” is the general name given by the AESO to categories of documents made by the AESO under the authority of the *Electric Utilities Act* and regulations, and that contain binding legal requirements for either market participants or the AESO, or both. AESO Authoritative Documents include: the ISO rules, the Alberta reliability standards, and the ISO tariff.

“directly connected to the **bulk electric system** and has a **maximum authorized real power** rating greater than 18 MW unless the **generating unit** is part of an industrial complex;”

For clarity, the wording “unless the generating unit is part of an industrial complex” is intended to indicate that, if the generating unit is part of an industrial complex, the only applicable subsection is 4.2.2.3.3. In other words, if the generating unit is part of an industrial complex, then the CIP Standards apply if the industrial complex has supply transmission service greater than 67.5 MW, unless the generating unit is a contracted blackstart resource, in which case subsection 4.2.2.3.4. is applicable to that generating unit.

### 3.2 Generating Unit that is within a Power Plant that is part of an Industrial Complex

Subsection 4.2.2.3.2.3. of the CIP Standards refers to a generating unit that:

“has a combined **maximum authorized real power** rating greater than 67.5 MW unless the power plant is part of an industrial complex;”

For clarity, the wording “unless the power plant is part of an industrial complex” is intended to indicate that, if the generating unit is within a power plant that is part of an industrial complex, the only applicable subsection is 4.2.2.3.3. In other words, if the generating unit is within a power plant that is part of an industrial complex, then the CIP Standards apply if the industrial complex has supply transmission service greater than 67.5 MW, unless the generating unit is a contracted blackstart resource, in which case subsection 4.2.2.3.4. is applicable to that generating unit.

### 3.3 Aggregated Generating Facility that is part of an Industrial Complex

Subsection 4.2.2.4.1. of the CIP Standards refers to an aggregated generating facility that is:

“directly connected to the **bulk electric system** and has a **maximum authorized real power** rating greater than 67.5 MW unless the **aggregated generating facility** is part of an industrial complex;”

For clarity, the wording “unless the aggregated generating facility is part of an industrial complex” is intended to indicate that, if the aggregated generating facility is part of an industrial complex, the only available subsection is 4.2.2.4.2. In other words, if the aggregated generating facility is part of an industrial complex, then the CIP Standards apply if the industrial complex has supply transmission service greater than 67.5 MW, unless the aggregated generating facility is a contracted blackstart resource, in which case subsection 4.2.2.4.3. is applicable to that aggregated generating facility.

## 4 Clarification Regarding Applicability

For clarity, the wording “the **operator** of a **generating unit** and the **operator** of an **aggregated generating facility**,” in subsection 4.1.3. of the CIP Standards is intended to indicate that the operator of a generating unit and the operator of an aggregated generating facility are each considered to be a “Responsible Entity”.

For clarity, the wording “the **legal owner** of a **generating unit** and the **legal owner** of an **aggregated generating facility**,” in subsection 4.1.4. of the CIP Standards is intended to indicate that the legal owner of a generating unit and the legal owner of an aggregated generating facility are each considered to be a “Responsible Entity”.

## 5 Identify, Assess, and Correct

In this section, the requirement in a CIP Standard to “identify, assess and correct” is referred to as the “self-correcting” part of the requirement, and the underlying requirement is referred to as the “technical requirement”.

The AESO anticipates that the “identify, assess and correct” wording will be removed from the next

version of the CIP Standards adopted in Alberta. Until such time, the AESO recommends that market participants identify, assess and correct deficiencies in meeting the technical parts of these requirements as follows:

- (a) identify deficiencies by self-reporting contraventions to the Market Surveillance Administrator (“MSA”); and
- (b) assess and correct deficiencies that are the same as the first identified deficiency through a mitigation plan submitted to the MSA as described in the MSA Compliance Process.

The following evidence may be used to demonstrate that the self-correcting part of the requirement has been satisfied:

- (i) evidence that the market participant is able to identify deficiencies in meeting the technical part of the requirement;
- (ii) records of each identified deficiency in meeting the technical part of the requirement;
- (iii) records of the result of an assessment made of each identified deficiency in meeting the technical part of the requirement;
- (iv) records of the mitigating actions made to correct each identified deficiency in meeting the technical part of the requirements; and
- (v) evidence that each identified deficiency in meeting the technical part of the requirement was corrected.

### Revision History

Posting Date	Description of Changes
2019-01-15	Deleted last sentence in Section 5 and amended additional sentence to minimize ambiguity.
2017-05-16	Addition of subsection 5
2017-05-04	Addition of subsections 3 and 4
2015-09-21	Initial publication