

November 3, 2021

To: Market Participants and other interested parties (“Stakeholders”)

Re: Consultation Letter – Proposed New Alberta Reliability Standard CIP-012-AB-1, Cyber Security – Communications between Control Centers (“CIP-012-AB-1”)

Section 19 of the *Transmission Regulation* requires the Alberta Electric System Operator (“AESO”) to consult with Stakeholders likely to be directly affected by the AESO’s adoption or making of reliability standards, and also requires the AESO to forward the proposed reliability standards to the Alberta Utilities Commission (“Commission”) for review along with the AESO’s recommendation that the Commission approve or reject them.

Accordingly, the AESO is providing notice and seeking comments from Stakeholders on the attached proposed new CIP-012-AB-1.

Applicability

The proposed new CIP-012-AB-1 applies to the following entities, referred to as “Responsible Entities”:

- (a) the operator of a generating unit;
- (b) the legal owner of a generating unit;
- (c) the operator of an aggregated generating facility;
- (d) the legal owner of an aggregated generating facility;
- (e) the operator of a transmission facility;
- (f) the legal owner of a transmission facility; and
- (g) the ISO;

that own or operate a control centre.

Exemptions: The following are exempt from this reliability standard:

- (a) cyber assets at facilities regulated by the Canadian Nuclear Safety Commission; and
- (b) a control centre that transmits to another control centre real time assessment or real time monitoring data pertaining only to the generating resource, transmission station, or substation co-located with the transmitting control centre.

Background

The purpose of proposed new CIP-012-AB-1 is to protect the confidentiality and integrity of real time assessment and real time monitoring data transmitted between control centres. This reliability standard applies to the AESO and to market participants. CIP-012-AB-1 requires applicable entities to have documented plans to mitigate the risks posed by unauthorized disclosure and unauthorized modification of real time assessment and real time monitoring data while being transmitted between any applicable control centres.

Summary of Proposed Changes

In developing the proposed new CIP-012-AB-1, the AESO redrafted the applicability section and made minor administrative amendments that were required to ensure that North American Electric Reliability Corporation (“NERC”) CIP-012-1, *Cyber Security – Communications between Control Centers* is capable of being applied in Alberta and does not require a material change in the framework for the market for electric energy.”

In addition, the AESO made amendments to ensure consistent use of defined terms as included in the AESO's [Consolidated Authoritative Document Glossary](#) ("CADG"). Administrative changes, such as formatting and grammatical corrections, have also been made in the proposed new CIP-012-AB-1.

The AESO intends to develop an information document to support proposed new CIP-012-AB-1. The purpose of this information document is to provide market participants with information regarding the use of the [NERC Cyber Security – Communications Between Control Centers Implementation Guidance for CIP-012-1](#) and [Cyber Security - Communications between Control Centers Technical Rationale and Justification for Reliability Standard CIP-012-1](#) in Alberta.

Defined Terms

When reviewing the attached proposed new CIP-012-AB-1, Stakeholders should note that all defined terms appear **bolded**. Stakeholders are encouraged to refer to the AESO's CADG when reviewing proposed reliability standards to ensure they have an accurate understanding of those defined terms.

Implementation of Alberta reliability standards

In accordance with Section 19 of the *Transmission Regulation*, the reliability standards that apply in Alberta are those of the Electric Reliability Organization ("ERO") or any other reliability standards, to the extent that such reliability standards are adopted by the AESO after consultation with Stakeholders and after receipt of Commission approval. The NERC was certified as the ERO for the United States by the Federal Energy Regulatory Commission under the US *Energy Policy Act* of 2005. Further, the NERC was recognized as the ERO by the Minister of Energy in Alberta.

Reliability standards and definitions proposed for approval or rejection by the AESO are developed:

- (a) based on the reliability standards and definitions of the NERC; or
- (b) to amend, supplement, or replace the NERC reliability standards or definitions.

For more information on the AESO's reliability standards, visit the AESO website at www.aeso.ca and follow the path Rules, Standards and Tariff > Alberta reliability standards.

Request for Comment

Please use the attached *Stakeholder Comment Matrix* when submitting comments to the AESO. The AESO will only consider written comments in finalizing proposed new CIP-012-AB-1. Stakeholders should ensure that comments provided represent all interests within their organization. Please respond to the questions in the attached *Stakeholder Comment Matrix* and provide your specific comments, proposed revisions, and reasons for your position. Providing general comments does not give the AESO any specific issue to consider and address, and results in a general response. The scope of comments is limited to proposed new CIP-012-AB-1. The AESO will not consider any comments received that are outside of this scope.

Stakeholders are asked to provide comments no later than **November 24, 2021** to ars_comments@aeso.ca. Adherence to deadlines is essential to the integrity of the comment process, and as such, the AESO may choose not to consider any Stakeholder comments received after the deadline.

The AESO will be publishing all comments received for industry review in November. The AESO expects to publish replies to the comments with the final proposed new CIP-012-AB-1 in January 2021. The AESO expects to forward the proposed new CIP-012-AB-1 to the Commission in January, along with its recommendation that the Commission approve the proposed new CIP-012-AB-1 to become effective July 1, 2022.

If the AESO does not receive comments regarding proposed new CIP-012-AB-1, the AESO expects to forward the proposed new CIP-012-AB-1 to the Commission in December, along with its recommendation that the Commission approve the proposed new CIP-012-AB-1 to become effective July 1, 2022.

Related Materials to Consultation Letter

The following documents are posted on the stakeholder engagement page:

1. *Stakeholder Comment Matrix* for proposed new CIP-012-AB-1;
2. Clean copy of proposed new CIP-012-AB-1; and
3. *Comparison Rationale Matrix* for proposed new CIP-012-AB-1.

Sincerely,

Jodi Marshall

Jodi Marshall
Manager, ISO rules and Alberta Reliability Standards
Email: ars_comments@aeso.ca