

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 document¹ in effect, the authoritative document governs.

1 Purpose

This information document relates to the following authoritative document:

- Reliability standard CIP-014-AB-2, *Physical Security* (“CIP-014-AB-2”)

The purpose of this information document is to provide guidance information for market participants on the use of the North American Electric Reliability Corporation’s (“NERC”) CIP-014 guidance information, as published from time to time by NERC, including the following:

- (a) CIP-014-2 *Physical Security - Guidelines and Technical Basis* section; and
- (b) various ERO Enterprise-Endorsed Implementation Guidance available on the Compliance Guidance page of the NERC website.

This information document also provides clarifications on CIP-014-AB-2 and the process flow in Alberta.

2 Use of NERC Guidance Information for the CIP Standards

As with every 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 for requirements R4, R5, and R6 contained within the NERC CIP-014 guidance information and recognizes that it may be a useful reference for market participants as they implement CIP-014. In addition, the AESO may use the NERC CIP-014 guidance information as reference material in assessing compliance with CIP-014-AB-2 where it determines that the guidance information is applicable.

3 Clarification Regarding CIP-014-AB-2 and Process Flow

For the purpose of CIP-014-AB-2, the AESO considers “transmission substation” to include all facilities within the substation fence.

3.1 Clarification regarding the notification under requirements R2 and R2.1

Due to the relatively long time between risk assessments, the AESO will confirm with the affected legal owners that the contact information on file is up to date before the official notification.

Within 30 days following the completed requirement R1 risk assessment, the AESO will publish in its Stakeholder Newsletter which notification emails related to requirements R2 and R2.1 have been sent out. Only the affected legal owners will receive the notification emails which will include the secured SharePoint link to the actual list of substations. The AESO will request that each affected legal owner confirm the receipt of the notification email.

3.2 Clarification regarding requirements R4, R5 and R6.

The entities specified in requirements R4, R5, and R6 are only required to perform the activities listed in requirements R4, R5, and R6 in respect of the facilities identified in the relevant notifications provided under requirements R2 and R3.

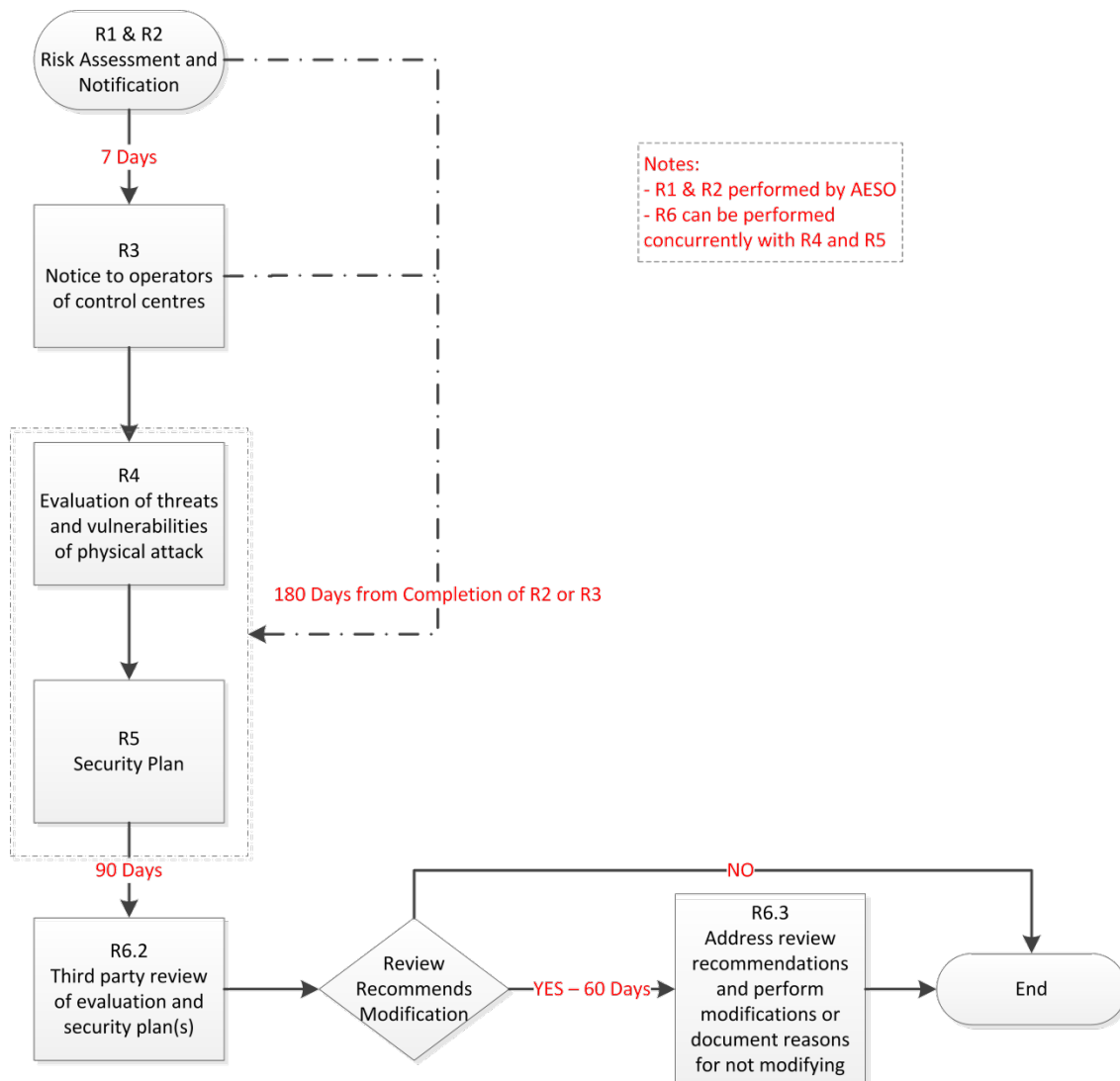
In other words, only the legal owner of a transmission facility notified in accordance with requirement R2 has the obligation to perform the actions required per requirements R4, R5 and R6 for a transmission substation. The notification in accordance with requirement R3 triggers the operator of

¹ “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 associated 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.

transmission facility’s obligations under requirements R4, R5 and R6 in respect of the associated primary control centre, not the transmission substation.

3.3 Clarification regarding the overall process flow

For clarity, the NERC CIP-014 guidance process flow is replaced with the process flow below applicable to Alberta.



Revision History

Posting Date	Description of Changes
2020-03-20	Added new paragraph 3.2 to clarify responsibilities of legal owners versus operators for requirements R4, R5 and R6
2020-02-04	Added clarification regarding “transmission substation”
2019-06-11	Initial release