

## Stakeholder Comments

Posted | Oct. 19, 2022

1. ATCO Electric
2. Capital Power
3. ENMAX
4. EPCOR Distribution & Transmission Inc.(EDTI)

# Stakeholder Comment Matrix – September 21, 2022

CIP-012-AB-1 | Implementation Technical Working Group



Comment period:	<b>September 22, 2022 to October 14, 2022</b>	Contact:	Alain Duguay
Comments from:	ATCO Electric Ltd.	Email:	alain.duguay@atco.com
Date:	2022/10/14		

## Instructions

1. Please fill out the section above as indicated.
2. Please respond to the questions below and provide your specific comments.
3. **Please submit one completed comment matrix per organization.**
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5. Email your completed comment matrix to [stakeholder.relations@aeso.ca](mailto:stakeholder.relations@aeso.ca) by **October 14, 2022**

## Request for feedback

The AESO is seeking feedback from interested stakeholders on their perspectives as it relates to the draft AESO information document ID#2021-007, *Cyber Security – Communications between Control Centres* (“ID #2021-007”) and the *CIP-012-AB-1 Reliability Standard Audit Worksheet* (“CIP-012-AB-1 RSAW”). The AESO values stakeholder feedback and invites all interested stakeholders to provide their comments on the following questions. Please be as specific as possible with your responses. Thank you.

	Questions	Stakeholder Comments
1.	Is there any content in ID#2021-007 that is not clearly articulated? If yes, please indicate the specific section of the draft information document, describe the concern, and suggest alternative language.	When does AESO anticipate finalizing the PSK/CERT requirements and management process? Will there be a periodic change of the PSK/CERT, ie annually? AESO has published minimum VPN requirements, which is adequate for communications between TFO Control Centres, however, for connections between the TFO and AESO, ATCO Electric will need the exact requirements so we can program our VPN properly to match AESO’s end. When does the AESO anticipate being able to provide the exact requirements
2.	Is there any additional content that you would like to see in ID#2021-007? If yes, please specify.	Regarding section 5.4 Generalized Assessment of Communication Link Applicability (Section 2 -applicability of CIP012-AB-1) of the ID document, there are several references to a “control room “as well as Control Room tiles indicated in the Figure 1 diagram. As this



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	impacts on determining which operating areas are within scope, could the AESO please provide a definition for a “Control Room “in the ID; similar to the draft ID#2012-001RS associated with the new COM-001-AB-3 Communications standard.
3.	Is there any content in the CIP-012-AB-1 RSAW that is not clearly articulated? If yes, please indicate the specific section of the draft RSAW, describe the concern, and suggest alternative language.
4.	Is there any additional content that you would like to see in the CIP-012-AB-1 RSAW? If yes, please specify.
5.	ATCO appreciates the information provided in this CIP-012 Technical Working Group session.

Thank you for your input. Please email your completed matrix to: [stakeholder.relations@aeso.ca](mailto:stakeholder.relations@aeso.ca)

# Stakeholder Comment Matrix – September 21, 2022

CIP-012-AB-1 | Implementation Technical Working Group



Comment period:	<b>September 22, 2022 to October 14, 2022</b>	Contact:	Shannon Ferdinand, Director Regulatory Compliance
Comments from:	Capital Power	Email:	<a href="mailto:sferdinand@capitalpower.com">sferdinand@capitalpower.com</a>
Date:	[2022/09/30]		

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	Questions	Stakeholder Comments
1.	Is there any content in ID#2021-007 that is not clearly articulated? If yes, please indicate the specific section of the draft information document, describe the concern, and suggest alternative language.	<p>The AESO ID#2021-007 references the NERC Cyber Security – Communications between Control Centers Technical Rationale document – August 2018 version. However, section 5.4 of the AESO ID excludes a direct reference to NERC’s Figure 4.</p> <p>Capital Power is concerned that the AESO’s exclusion of NERC’s Figure 4 from ID#2021-007 combined with the generalized AESO ID#2021-007 Figure 1 Reference Model which identifies GFO Control Center communication to the AESO as in-scope may lead to unnecessary confusion and inefficiencies (i.e administrative Information Requests etc.) during an audit.</p> <p>Capital Power requests that the AESO amend ID#2021-007 to include Figure 4 from the NERC Technical Rationale.</p>



	Questions	Stakeholder Comments
	<p>Is there any additional content that you would like to see in ID#2021-007? If yes, please specify.</p>	<p>For absolute clarity Capital Power requests that the AESO include a direct reference to the exclusion of communication to the AESO via the ADAMS portal. Capital Power offers, as an example, the following clarification received from another Canadian ISO (anonymized) that offered Market Participants such clarity:</p> <p><i>“XXX does not consider dispatch instructions to be classified as real time monitoring or real time assessment data, therefore CIP-012-1 is not applicable.</i></p> <p><i>XXX considers real-time monitoring data and real time assessment data as those that the XXXX requires under the Market Rules (XXX).</i></p> <p><i>Our networking team has assessed existing Market Participant connections to/from the IXXX for real time monitoring and real time assessment data that may be transmitted between Control Centers and determined that there are only two applicable Market Participants (Capital Power was not one of the entities listed).”</i></p>
3.	<p>Is there any content in the CIP-012-AB-1 RSAW that is not clearly articulated? If yes, please indicate the specific section of the draft RSAW, describe the concern, and suggest alternative language.</p>	<p>Capital Power would like clarification added to the RSAW to allow entities to demonstrate their exemption. Without this additional context and clarification Capital Power is concerned that an entities demonstration of exemption leaves too much room open for interpretation. Alternatively, given the complexity of this standard (demonstrated by the need for a lengthy NERC Technical Rational and AESO ID), Capital Power invites the AESO to consider allowing entities to proactively engage the AESO in an assessment of their exemption rationale before the implementation of the standard rather than having entities wait until they are audited to discover that the AESO’s interpretation of the exemption criteria is different.</p>

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4.	Is there any additional content that you would like to see in the CIP-012-AB-1 RSAW? If yes, please specify.	See Response to Comment 3.
5.	Is there something the AESO could have done to make the session more helpful. If so, please specify.	<p>Capital Power appreciates the AESO's proactive efforts to engage industry on this standard. In alignment with previously ARS Enhancement Project Comment submissions by Capital Power, we again offer the opinion that the AESO's complete alignment with NERC (using ISO Rules for one-off exceptions) – similar to the Ontario IESO would greatly reduce the complexity of the AESO Reliability Standard Compliance Program and would reduce inefficiencies such as the need for the AESO to produce a separate ID instead of being able to rely on the work hours put into the NERC Technical Rationale.</p> <p>Using CIP-012 as an example, the AESO has done an excellent job of alignment with the NERC version of the standard. However, the NERC version of the standard benefits from CIP-012's alignment with TOP-003 and IRO-010. Because the AESO is not aligned with NERC on IRO-010, TOP-003 or the NERC Glossary, the AESO needs to put in additional work to map and provide clarification on the AESO CIP-012 standard. AESO's reference and 'general alignment' to <i>parts</i> (vs. the entirety) of the NERC Technical Rationale, though appreciated, again creates confusion and inefficiencies which could be mitigated by greater efforts to align with NERC.</p>

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# Stakeholder Comment Matrix – September 21, 2022

CIP-012-AB-1 | Implementation Technical Working Group



Comment period:	<b>September 22, 2022 to October 14, 2022</b>	Contact:	Mark McGillivray
Comments from:	ENMAX Corporation	Email:	<a href="mailto:McGillivray@enmax.com">McGillivray@enmax.com</a>
Date:	2022/10/13		

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	Questions	Stakeholder Comments
1.	Is there any content in ID#2021-007 that is not clearly articulated? If yes, please indicate the specific section of the draft information document, describe the concern, and suggest alternative language.	<ul style="list-style-type: none"><li>• Section 5.4 needs to include the reference to Figure 4 in the NERC Rationale Document, as well as figures 1, 2, and 3.</li></ul>
2.	Is there any additional content that you would like to see in ID#2021-007? If yes, please specify.	<ul style="list-style-type: none"><li>• It would be useful to include the specific figures from the NERC Rationale (document dated August 2018) Figures 1, 2, 3, and 4 directly into the AESO document for additional clarity on Generation control centres and the communication data flows that are exempt from CIP-012.</li></ul>
3.	Is there any content in the CIP-012-AB-1 RSAW that is not clearly articulated? If yes,	<ul style="list-style-type: none"><li>• The RSAW does not specifically account for the ability for an entity to have exemptions defined within section 5.4 of the ID#2021-007. This can result in inconsistencies</li></ul>



	Questions	Stakeholder Comments
	<p>please indicate the specific section of the draft RSAW, describe the concern, and suggest alternative language.</p>	<p>between a registered entity and the AESO auditors in determining facilities that are in scope or out of scope. There should be a section to reference exemptions generated by 5.4 of #ID#2021-007. This concern was raised during the recent webinar related to the CIP-012 ID document as well.</p> <ul style="list-style-type: none"> <li>AR1(i) asks for dated documented plan(s) in accordance to R1. ID#2021-007 suggests providing supporting documentation such as network diagrams, control centre floor plans and letters from responsible entities identifying their responsibilities for applying security protection. Will the RSAW be amended to request such evidence or other evidence demonstrating implementation of the plan(s)?</li> </ul> <p>Note: The RSAW does include the section in the RSAW “or any other evidence to demonstrate compliance with R1” but that section is not preceded with AR1(ii) or otherwise, which is inconsistent from other RSAWs.</p>
4.	<p>Is there any additional content that you would like to see in the CIP-012-AB-1 RSAW? If yes, please specify.</p>	<ul style="list-style-type: none"> <li>See response to Question 3.</li> </ul>
5.	<p>Is there something the AESO could have done to make the session more helpful. If so, please specify.</p>	<ul style="list-style-type: none"> <li>The session should have been recorded. Sessions should also focus on working groups between market participants.</li> </ul>

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# Stakeholder Comment Matrix – September 21, 2022

CIP-012-AB-1 | Implementation Technical Working Group



Comment period:	<b>September 22, 2022 to October 14, 2022</b>	Contact:	Joseph Shield
Comments from:	EPCOR Distribution & Transmission Inc.	Email:	jshield@epcor.com
Date:	2022/10/14		

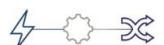
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1. Is there any content in ID#2021-007 that is not clearly articulated? If yes, please indicate the specific section of the draft information document, describe the concern, and suggest alternative language.	<p>EPCOR Distribution &amp; Transmission Inc. (EDTI) suggests that the definitions for ‘Real-Time Assessment’ and ‘Real-Time Monitoring’ be included in the Alberta Electric System Operator’s (AESO) Consolidated Authoritative Document Glossary (CADG.) EDTI notes that as per the AESO’s website, the AESO’s CADG ‘contains the defined terms and related definitions used within ISO rules, Alberta Reliability Standards and the ISO tariff.’ As both ‘Real-Time Assessment’ and ‘Real-Time Monitoring’ are used within CIP-012-AB-1, EDTI suggests that they should be defined in the CADG as well as ID#2021-007.</p> <p>EDTI requests clarity on the process outlined in Section 8 of ID#2021-007. Specifically, if entities have applicable communication links with the AESO, when are those entities expected to receive the document from the AESO that outlines the AESO’s responsibilities</p>



Questions		Stakeholder Comments
		with respect to the identification and implementation of security protection on each specific communication link.
2.	Is there any additional content that you would like to see in ID#2021-007? If yes, please specify.	EDTI requests that the AESO clarify in ID#2021-007 whether communication between control operating personnel/operator workstations and their associated data centers are in scope for CIP-012-AB-1 requirements, when the operating personal/operator workstations and associated data centers are in different locations.
3.	Is there any content in the CIP-012-AB-1 RSAW that is not clearly articulated? If yes, please indicate the specific section of the draft RSAW, describe the concern, and suggest alternative language.	EDTI does not have any comments pertaining to the content in the CIP-012-AB-1 RSAW.
4.	Is there any additional content that you would like to see in the CIP-012-AB-1 RSAW? If yes, please specify.	EDTI would like to see a measure for evidence of implementation in the Evidence Submission column in the CIP-012-AB-1 RSAW; however, as the AESO noted in the technical working group session on September 19, this will be incorporated into the RSAW at a later date.
5.	Is there something the AESO could have done to make the session more helpful. If so, please specify.	At the Technical Working Group Session on September 19, the AESO noted that they would be initiating one-on-one detailed technical discussions between themselves and applicable entities in September 2022. EDTI is yet to be contacted regarding these discussions. EDTI requests clarity on when entities can expect these discussions to commence.

Thank you for your input. Please email your completed matrix to: [stakeholder.relations@aeso.ca](mailto:stakeholder.relations@aeso.ca)