



Critical Infrastructure Stakeholder Oversight Update

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Planning Committee
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- At the April 3rd Critical Infrastructure Stakeholder Oversight Meeting, Stakeholders expressed concern about continuing to working the **first part** of the issue:

Issue Scope:

Consider PJM's role in the CIP-014 process, and whether additional language should be developed to address both:

- 1.) **Current CMPs** referenced in the August 12, 2019 TO's Notice of Intent to file, and
- 2.) Avoidance of future facilities from becoming CIP-014 critical

- Stakeholders presented arguments for both sides, and PJM requested the discussion be brought to the Planning Committee for further guidance.

- 08/12/19: TOs submitted a notice of intent to file Attachment M-4 regarding existing CMPs
- 09/12/19: The Office of the People's Counsel brought a PS/IC to the PC for a first read to address **1. mitigation** of existing CMPs, and **2. avoidance** of future CIP-014 critical assets
- 12/12/19: Planning Committee approved the PS/IC
- 01/17/20: Attachment M-4 was filed at FERC by the TOs
- 01/27/20: PJM hosted the first CISO meeting, and subsequent monthly meetings
- 03/17/20: Attachment M-4 was accepted by FERC
- 04/03/20: Discussion at the CISO meeting resulted in a decision to bring the issue scope back to the PC for consideration and feedback.

Issue Content:

“This work is designed to consider whether the development of Tariff, Operating Agreement (“OA”), and Manual language is needed to address both the CMPs referenced in the August 12, 2019 Notice (**Part 1**), and future CIP-014 listed and other security impacted facilities (**Part 2**).”

The concern that remains:

Potential new CIP-014 facilities identified in-between

- *Part 1* – FERC approved CMP list; (< 20 facilities), and,
- *Part 2* – approval of resilience criteria that mitigates and prevents the introduction of additional CIP-014 facilities as part of the CISO proposal(s).

- PJM supports defining criteria for both *Mitigation* and *Avoidance* of CIP-014 facilities
 - PJM prioritizes **Avoidance** as providing the greatest immediate value to System Planning
- Confidentiality for CIP-014-2 facilities is critical
 - Current CEII and NDA's are not sufficient to maintain confidentiality
 - PJM cannot support a solution that does not adhere to NERC Standards or FERC guidance
- PJM believes FERC already addressed the “**Current CMPs** referenced in the August 12, 2019 TO's Notice of Intent to file” as part of the Attachment M-4 Order; any new RTEP CIP mitigation criteria would apply to future CIP critical facilities.
- CIP-014 *Mitigation* and *Avoidance* criteria should be addressed as separate solutions and do not need to be voted together as a single package at the PC.

- Stakeholders expressed concern about continuing to discuss *Part 1* (mitigation of existing CIP-014 facilities), considering FERC's ruling on Attachment M-4 filing in Docket ER20-841-000.
- PJM supports continuing work on both issues but suggests bifurcating the *Mitigation* and *Avoidance* topics for purposes of discussion and package proposals at future CISO meetings.
- Next meeting is April 28 at 1:00 p.m.