



## **Alberta Electric System Operator**

**Approval of New and Amended  
CIP Alberta Reliability Standards**

**August 25, 2023**

**Alberta Utilities Commission**

Decision 28354-D01-2023

Alberta Electric System Operator

Approval of New and Amended

CIP Alberta Reliability Standards

Proceeding 28354

Application 28354-A001

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The Commission may, no more than 60 days from the date of this decision and without notice, correct typographical, spelling and calculation errors and other similar types of errors and post the corrected decision on its website.

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## 1 Introduction

1. On July 25, 2023, pursuant to Section 19(4)(b) of the *Transmission Regulation*, the Alberta Electric System Operator (AESO)<sup>1</sup> forwarded a recommendation to the Alberta Utilities Commission to approve the following Critical Infrastructure Protection (CIP) reliability standards, related definitions, and proposed actions (collectively, the proposed new CIP reliability standards):

Reliability standard category	Reliability standard	Reliability standard/definition name	Proposed action
CIP	CIP-003-AB-8	<i>Cyber Security – Security Management Controls</i>	Adopt
CIP	CIP-003-AB-5	<i>Cyber Security – Security Management Controls</i>	Retire
CIP	CIP-005-AB-7	<i>Cyber Security – Electronic Security Perimeter(s)</i>	Adopt
CIP	CIP-005-AB-5	<i>Cyber Security – Electronic Security Perimeter(s)</i>	Retire
CIP	CIP-010-AB-4	<i>Cyber Security – Configuration Change Management and Vulnerability Assessments</i>	Adopt
CIP	CIP-010-AB-1	<i>Cyber Security – Configuration Change Management and Vulnerability Assessments</i>	Retire
CIP	CIP-013-AB-2	<i>Cyber Security – Supply Chain Risk Management</i>	Adopt
CIP	CIP-PLAN-AB-2	<i>Cyber Security – Implementation Plan for CIP Cyber Security Reliability Standards</i>	Adopt
CIP	CIP-PLAN-AB-1	<i>Cyber Security – Implementation Plan for Version 5 CIP Security Standards</i>	Retire
Definition	n/a	“removable media”	Adopt
Definition	n/a	“transient cyber asset”	Adopt
Definition	n/a	“CIP Senior Manager”	Amend

Note: The various types of reliability standards approved by the North American Electric Reliability Corporation are outlined at <http://www.nerc.com/page.php?cid=2|20>.

2. Pursuant to Section 19(4) of the *Transmission Regulation*, before adopting or making reliability standards, the ISO must consult with those market participants that it considers are

<sup>1</sup> The independent system operator (ISO) is established under Section 7(1) of the *Electric Utilities Act* and operates under the trade name AESO. For the purposes of this decision, AESO and ISO are used interchangeably.

likely to be directly affected. It must also forward the proposed reliability standards to the Commission for review, along with the ISO's recommendation that the Commission either approve or reject each of them.

3. Pursuant to sections 19(5) and 19(6) of the *Transmission Regulation*, the Commission must approve or refuse to approve each reliability standard in accordance with the recommendation of the ISO, unless an interested person satisfies the Commission that the ISO's recommendation is:

- (a) technically deficient, or
- (b) not in the public interest.

4. On July 27, 2023, the Commission issued a notice of application for the proposed new CIP reliability standards by uploading the notice to the Commission's eFiling System.

5. No objections were filed with the Commission by the August 11, 2023 deadline, specified in the notice of application.

## 2 Background

6. The AESO submitted that the proposed new CIP reliability standards are focused on responding to the risks posed to the Alberta Interconnected Electric System by increasing and evolving cyber threats. The proposed new CIP reliability standards integrate security baselines and modern technologies required for the AESO and market participants to mitigate these risks.

7. The proposed new CIP reliability standards relate to the following:

- **CIP-003-AB-8** changes specify consistent and sustainable security management controls that establish responsibility and accountability for the protection of bulk electric system (BES) cyber systems.
- **CIP-005-AB-7** changes manage electronic access to BES cyber systems by specifying a controlled electronic security perimeter in support of protecting BES cyber systems.
- **CIP-010-AB-4** changes seek to prevent and detect unauthorized changes to BES cyber systems by specifying configuration change management and vulnerability assessment requirements in support of protecting BES cyber systems.
- **CIP-013-AB-2** introduces supply chain security. This reliability standard will mitigate cyber-security risks to the reliable operation of the BES by implementing security controls for supply-chain risk management of BES cyber systems.
- **CIP-PLAN-AB-2** provides updated implementation timelines for the proposed new CIP reliability standards.

8. The AESO submitted that the proposed new CIP reliability standards could be applied in the Alberta framework with only minor revisions from the original North American Electric Reliability Corporation (NERC) versions. Several further changes were made in response to

stakeholder feedback, with the most significant of these being a phased implementation plan for CIP-003-AB-8, requirement R2.

9. To align with the changes outlined above, the AESO also proposed the adoption of the new NERC definitions for “transient cyber asset” and “removable media”, as well as a minor change to “CIP Senior Manager”.

10. Section 19(4)(a) of the *Transmission Regulation* requires that the ISO consult with those market participants that it considers are likely to be directly affected before adopting or making reliability standards. On December 9, 2022, the AESO posted a consultation letter on its website requesting comments from interested parties. Stakeholder comments were posted on the AESO’s website on February 7, 2023. Two reliability standards workshops, to review the proposed changes, were held on March 16 and April 25, 2023, with a second consultation letter posted on April 28, 2023. The second round of stakeholder comments were posted on the AESO’s website on May 31, 2023, and the AESO posted its replies on July 7, 2023.

11. The AESO submitted the proposed new CIP reliability standards with its application on June 25, 2023, and indicated that the proposed changes comply with the requirements of the *Transmission Regulation*, are not technically deficient and are in the public interest. The AESO recommended that the Commission approve the proposed new CIP reliability standards.

### **3 Does the AESO’s recommendation align with the criteria in the Transmission Regulation**

12. Section 19(4) of the *Transmission Regulation* specifies that, before adopting or making reliability standards, the ISO must consult with those market participants that it considers likely to be directly affected and forward the proposed reliability standards to the Commission for review, with the ISO’s recommendation that the Commission approve or reject them. The Commission is satisfied that the ISO has fulfilled these requirements.

13. Pursuant to sections 19(5) and 19(6) of the *Transmission Regulation*, the Commission must follow the recommendation of the ISO to either approve or reject proposed reliability standards unless the recommendation is demonstrated to be technically deficient or not in the public interest:

#### **Reliability Standards**

[...]

**19(5)** Subject to subsection (6), the Commission must approve or refuse to approve the reliability standards, agreements, criteria or directives, and must inform the ISO of its decision.

**(6)** The Commission must follow the recommendation of the ISO that the Commission approve or reject the proposed reliability standards, agreements, criteria or directives unless an interested person satisfies the Commission that the ISO’s recommendation is

- (a) technically deficient, or
- (b) not in the public interest.

14. The ISO forwarded the proposed new CIP reliability standards to the Commission with a recommendation that the Commission approve them. No interested party filed an objection with the AUC indicating that any of the proposed new CIP reliability standards are either technically deficient, or not in the public interest.

#### **4 Order**

15. Pursuant to Section 19(6) of the *Transmission Regulation*, and based on the recommendation of the ISO, the Commission approves the proposed new CIP reliability standards, effective as of October 1, 2024 (except for CIP-003-AB-8, requirement R2, which will have a staggered implementation timeline as detailed within the AESO's application).

Dated on August 25, 2023.

#### **Alberta Utilities Commission**

*(original signed by)*

Fino Tiberi  
Executive Director, Market Oversight and Enforcement  
On behalf of the Alberta Utilities Commission