

PROCEDURE



Market Manual 2: Market Administration

Part 2.16: Ontario Technical Feasibility Exception

Issue 3.0

This procedure provides guidance to TFE applicants on the Ontario-adapted NERC Technical Feasibility Exception process.

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This document may contain a summary of a particular *market rule*. Where provided, the summary has been used because of the length of the *market rule* itself. The reader should be aware, however, that where a *market rule* is applicable, the obligation that needs to be met is as stated in the “*market rules*”. To the extent of any discrepancy or inconsistency between the provisions of a particular *market rule* and the summary, the provision of the *market rule* shall govern.

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Related Documents

Document Title	Document ID
Technical Feasibility Exception Application – Part A	IESO_FORM_1717
Technical Feasibility Exception Application – Part B	IESO_GDE_0305
TFE Cost Recovery Agreement	IESO_AGR_0023
Reliability Compliance Enforcement Policy	IESO_PLCY_0014

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Table of Changes

Reference (Section and Paragraph)	Description of Change
Section 2	Form, Content and Submission of TFE Application
Section 5	TFE Maintenance

– End of Section –

Market Manuals

The *market manuals* consolidate the market procedures and associated forms, standards, and policies that define certain elements relating to the operation of the *IESO-controlled grid*. These procedures provide more detailed descriptions of the requirements for various activities than is specified in the "*market rules*". Where there is a discrepancy between the requirements in a document within a *market manual* and the "*market rules*", the "*market rules*" shall prevail. Standards and policies appended to, or referenced in, these procedures provide a supporting framework.

Market Procedures

The "Market Administration Manual" is Volume 2 of the *market manuals*, where this document forms "Part 2.16: Technical Feasibility Exception".

A list of the other component parts of the "Market Administration Manual" is provided in "Part 2.0: Market Administration Overview", in Section 2, 'About This Manual'.

Structure of Market Procedure

This market procedure is composed of the following sections:

1. **'Introduction'**, which contains general information about the procedure, including an overview, a description of the purpose and scope of the procedure, and information about roles and responsibilities of the parties involved in the TFE process.
2. **'Form, Content and Submission of TFE Applications'**, which contains the steps involved in submitting TFE applications.
3. **'TFE On-Site Visits'**, which details information for the *TFE applicant* regarding MACD's on-site visits.
4. **'TFE Assessment Report and Approval/Disapproval Process'**, which outlines the requirements of the final TFE assessment report.
5. **'TFE Maintenance'**, which details the steps involved in the ongoing maintenance of *TFE applications*.
6. **'Guide to IESO Portal Collaboration'**, which contains access information to the confidential *TFE* portal collaboration community web site.
7. **"TFE Process Diagram"**, which summarizes the *TFE* process in diagram format.
8. **'Appendices'**, which include a list of forms, guidelines, agreements and diagrams related to this procedure.
9. **'References'**, which contains a list of documents related to this procedure.

Conventions

The *market manual* standard conventions are defined in the "Market Manual Overview" document.

– End of Section –

1. Introduction

1.1 Purpose

This document provides the procedure by which a *TFE applicant* may apply for and receive a technical feasibility exception or “*TFE*”. A *TFE* allows for temporary dispensation with *NERC* Critical Infrastructure Protection Standards (“*CIP Standards*”) in accordance with the Procedure for Requesting and Receiving Technical Feasibility Exceptions to *NERC*’s Critical Infrastructure Protection Standards: Appendix 4D to the Rules of Procedure (“*NERC TFE Process*”).¹

1.2 Scope

This procedure is intended to provide *TFE applicants* with a summary of the steps and interfaces involved in the *TFE* process.

The steps described in this document serve as a roadmap for *TFE applicants* and reflect the requirements set out in section 3.2A of Chapter 5 of the *market rules* and applicable *IESO* policies and standards.

1.3 Process Overview

NERC’s *CIP Standards* (*CIP-002* through *CIP-009*) specify mandatory requirements for the protection of Covered Assets² associated with bulk electric system assets that have been classified as “critical”. Critical assets are those which, if destroyed, degraded or otherwise made unavailable, would affect the reliability or operability of the bulk electric system.

In Ontario, the *IESO* developed criteria to identify critical assets in consultation with the stakeholder-represented Emergency Preparedness Task Force, which includes key *market participants* and government representatives. Affected *market participants*, owning critical assets were informed by the *IESO* and required to identify those covered assets associated with the critical asset.

Market participants that own critical assets identified by the *IESO* have the ability to apply for exceptions to *CIP Standards* for equipment that is unable to meet the mandatory requirements for reasons specified in *NERC*’s “Procedure for Requesting and Receiving Technical Feasibility Exceptions to *NERC* Critical Infrastructure Protection Standards” (the “*NERC TFE Process*”) as approval criteria.

An approved *TFE* does not exempt the *TFE applicant* from compliance with the requirement; it only grants temporary relief from compliance with the requirement. A *TFE application* must therefore contain a timeline for eliminating the dependency on a *TFE* and the execution of compensating and/or mitigation measures during the period in which a *TFE* is in effect.

¹ See Appendix 4D to *NERC*’s Rules of Procedure on the *TFE* process, April 12, 2011: http://www.nerc.com/files/Appendix4D_TFE_Procedures_20110412.pdf. For the purposes of this procedure, the Appendix 4D to *NERC*’s Rules of Procedure are referred to as “*NERC TFE Process*”.

² A “Covered Asset” is either a Cyber Asset or a Critical Cyber Asset that is subject to an Applicable Requirement.

1.4 Document Interpretation Overview

The *IESO* has adopted the *NERC* approved *TFE* process with minor amendments to make it applicable in Ontario. The term “*TFE Request*” as contained in the *NERC TFE Process* shall have the same meaning as the term “*TFE application*” in the Ontario process and as defined by the Ontario market rules³. Unless otherwise noted, the terms used in this document are to be understood as having the same meaning as the terms used in section 2.0 of the *NERC TFE Process*.

The following sections of this procedure contain minor variations to the *NERC TFE Process* and shall apply to all *TFE applicants*:

- Section 2.3: Part A – Initial Screening
- Section 2.3.2: TFE Initial Deposit
- Section 2.4.2: TFE Cost Recovery Agreement
- Section 2.4.3: Part B Invoice
- Section 2.4.4: Part B Cost Threshold
- Section 3.0: TFE On-Site Visits
- Section 4.1: TFE Assessment Report
- Section 4.3: Enforcement Action for the Period a TFE Application is Being Reviewed
- Section 5: TFE Maintenance
- Section 5.1: Implementation, Reporting and Periodic Review of Approved TFE
- Section 5.2: Amendment of an Approved TFE
- Section 5.3: Termination of an Approved TFE
- Section 5.4: Transfer of an Approved TFE
- Section 5.5: Hearings and Appeals Process for TFE Applicants
- Section 5.6: Confidentiality of TFE Applications and Related Information
- Section 5.7: Reporting to Standards and Regulatory Authorities
- Section 6.0: Guide to IESO Portal Collaboration

This document has been developed to clarify differences between the *NERC TFE Process* and the *TFE application* process in Ontario. Should any conflicts exist between this document and the *NERC TFE Process*, this document shall take precedence.

Any future requirements and/or amendments to the *NERC TFE process* will be adopted by the Ontario process unless otherwise specified herein.

1.5 Roles, Responsibilities and Obligations

The role of the *IESO*, the Market Assessment and Compliance Division (“*MACD*”) and *TFE applicants* as they relate to the *TFE process*, is outlined below.

³ *TFE applicant* is defined in the Market Rules as (i) a *market participant* who applies to the *IESO* for a *TFE*; or (ii) a person applying to become a *market participant* who applies to the *IESO* for a *TFE*; or (iii) the *IESO*, in the event the *IESO* requires a *TFE*. See Market Rules, Chapter 5, Section 3.2A

1.5.1 Role of the IESO

The *Electricity Act, 1998* (Ontario)⁴ empowers the *IESO* to make and enforce rules for the Ontario electricity market. Reliability standards have effect in Ontario through these market rules. As such, a violation of a reliability standard is seen in Ontario as a breach of Ontario's market rules, and accordingly, is subject to enforcement processes and sanctions contained within those rules⁵.

In accordance with the *market rules*, section 3.2A, Chapter 5, the *IESO* has the authority to process a *TFE application* in accordance with the Ontario-adapted *NERC* procedures for processing *TFE applications* as set out in the applicable market manual. The *IESO*, through OEB licensing obligations, is accountable for complying with all applicable reliability standards and criteria.

1.5.2 Obligations of Market Assessment and Compliance Division

Through delegated authority from the *IESO*'s CEO, MACD is responsible for monitoring and enforcing compliance with all market rules and reliability standards.

Given this framework, MACD is responsible for reviewing and approving *TFE applications* in Ontario and enforcing any breach of CIP Standards.

As the lead business unit in the *TFE* assessment process, MACD:

- executes all aspects of *TFE* assessments, including CIP compliance analysis of the requirements that are the subject of the *TFE applications*, evaluation of approval criteria and adequacy of mitigations and compensating measures, approvals, disapprovals, amendments, terminations, transfers, terms and conditions, including mitigation and compliance plans;
- establishes the scope of all *TFE* assessments;
- establishes all terms and conditions of *TFE* maintenance;
- makes decisions regarding the interpretation of CIP requirements;
- administers the *TFE* budget tracking and cost recovery process;
- provides a single point of contact to the *applicant* for the *TFE* process;
- coordinates site visits, as required;
- drafts and delivers the presentation at site visits, as required;
- produces the *TFE* assessment report to be reviewed by the *applicant*
- amends or terminates an approved *TFE* in whole or in part (on its own initiative).

In executing these responsibilities, MACD:

- may utilize the services of other *IESO* staff outside of MACD;
- may seek input, advice, or support from *NPCC* or *NERC*, whenever required;

⁴ See the *Electricity Act, 1998* (Ontario). http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_98e15_e.htm

⁵ See Market Rules, Chapter 3, Section 6.

- may use the recommendations of consulting services (if required) outside MACD to inform its decisions to either approve or disapprove *TFE application*; and
- shall ensure that non-disclosure agreements (“NDAs”) are signed by external parties and retained for *TFE* evaluation and approval processes.

To avoid possible conflict of interest, MACD will not use *IESO* staff to either screen *TFE applications* submitted by the *IESO* or to recommend a course of action for *TFE applications* submitted by the *IESO*. Apart from *TFE applications* submitted by the *IESO*, on a case-by-case basis, if MACD assesses actual or perceived conflict of interest concerning any MACD review team member, it will be identified to the *TFE applicant* prior to the commencement of the *TFE assessment* process, and comments on the conflict will be requested from the *applicant*. MACD will consider the *applicant’s* comments and communicate its determination to the *applicant*.

1.5.3 Role of the TFE Applicant

The circumstances under which a *TFE applicant* may apply and obtain approval for a *TFE* are outlined in the *NERC TFE* Process.

The responsibilities for applying, substantiating, obtaining approval, and maintaining approval of a *TFE* is borne by the *TFE applicant*. The cost of processing a *TFE application* and any process costs associated with a *TFE application* are borne by the *TFE applicant*, as specified in Chapter 5, section 3.2 A of the Ontario market rules.

– End of Section –

2. Form, Content and Submission of TFE Applications

The following sections outline the form, content and submission requirements for a *TFE* application.

2.1 Separate Submission for Each TFE Application

A separate *TFE application* must be submitted by the *TFE applicant* through the *TFE* portal collaboration community⁶ for each Applicable Requirement⁷ pertaining to each Covered Asset. *TFE applications* for certain Covered Assets may be grouped together to allow for the assessment of multiple, similar Covered Assets. MACD will determine, in its sole discretion, whether *TFE applications* for similar Covered Assets may be grouped together for assessment and/or cost recovery purposes based on factors including whether:

- the *TFE applications* are made on the same basis;
- the Covered Assets have the same compensating/mitigating measures; and
- the Covered Assets have the same proposed expiration dates.

During the initial screening process, MACD will advise as to whether particular *TFE applications* can be grouped together for assessment and/or cost recovery purposes. MACD may elect to change groupings at any stage of the process if it determines the groupings from the initial screening are no longer appropriate.

2.2 Form and Format of a TFE Application

A *TFE application* consists of Part A (initial screening) and Part B (substantive review). Information requirements for both Part A and Part B are outlined in the *NERC TFE Process*. These requirements apply to the Ontario-adapted *TFE application* process, unless expressly modified in this document.

2.3 Part A – Initial Screening

The *TFE applicant* notifies MACD at macd.tfe@ieso.ca that they intend to apply for a *TFE(s)*. MACD then directs the *applicant* to the Part A forms, which are either obtained on the web at <http://www.ieso.ca/imoweb/marketComp/tfe.asp>, or by contacting MACD at macd.tfe@ieso.ca (see Appendix A).

The *TFE applicant* provides MACD with appropriate contact information to set-up/verify its access to the *TFE* portal collaboration community (see Section 6). Part A submissions are completed and submitted by the *TFE applicant* separately for each *TFE* via the *TFE* portal collaboration community.

⁶ The process for submitting a *TFE application* through the *TFE* portal collaboration community is outlined in Section 2 of this procedure.

⁷ An “Applicable Requirement” is a requirement of a CIP Standard that expressly provides either (i) that compliance with the terms of the requirement are needed where technically feasible, or (ii) that technical limitations may preclude compliance with the terms of the requirement.

An email is sent by the *applicant* to macd.tfe@ieso.ca notifying MACD that a submission has been made through the portal.

A *TFE Part A Screening Assessment* is conducted by MACD for each *TFE application* to ensure the *applicant* has:

- correctly interpreted the *NERC CIP* standard requirement that is the subject of the *TFE* to assess the need for a *TFE application*;
- properly categorized, by type, the cyber assets for which the *TFE* has been requested and has properly reconciled their count of covered assets against a detailed list of covered cyber assets (if provided);
- adequately identified the location(s) of the covered assets;
- identified only one (and the most appropriate) approval criteria which forms the basis for the *TFE* application, and that the selected criterion applies to all of the assets covered under this *TFE*;
- defined the basis for the *TFE* such that it aligns with the supporting evidence which may include, as the case may be: vendor attestations regarding the security of their products; cyber asset security configuration information; business case and financial evaluation documentation; quotations and descriptions of compliant assets to replace existing assets; schedules for installation/configuration of equipment; change tickets or other documentation demonstrating work done to make cyber assets compliant; etc.
- stated that the time they can achieve strict compliance correlates with the term of the *TFE*;
- articulated by when they can achieve strict compliance with adequate clarity such that MACD can properly assess the validity of the issue as it relates to the term requested in the *TFE application*;
- justified why it makes sense to consider a number of cyber assets together, as part of one *TFE application*.
- provided timing for the completion of plans to install and configure mitigating measures and to achieve strict compliance that is acceptable to MACD;
- developed a set of mitigating measures that are appropriate given the type of exposure created by possible non-compliance;
- ensured that information within a *TFE Part A* application is consistent across each *application* (e.g., schedule dates have the correct time sequence).

A *TFE Part A* screening assessment typically involves one or more conference calls and/or face-to-face meetings with the *TFE applicant* to understand their *applications* and to provide the *applicant* with recommendations regarding the resubmission of the *Part A* information to enable its acceptance.

These recommendations may involve:

- splitting or combining *TFE applications* to ensure assessment efficiencies, such as commonality for all cyber assets within a *TFE application* (see section 2.3.1);
- information on the plan and timing for implementing mitigating and/or compensating measures;
- information on the plan and timing for reaching strict compliance;

- a change in the basis for the *TFE*; withdrawing a *TFE application* if the *applicant* has assessed the need for the *TFE* incorrectly; or
- keeping MACD informed about any changes to the application (for example, MACD would need to be aware if cyber assets have become compliant after the submission of the original application).

The conference calls conducted during the *TFE* Part A screening are also used as a means of assisting the *applicant* with various aspects of the *TFE* process, providing guidance on the submission of Part B information, and discussing the type of evidence that may be requested during the Part B onsite visit.

2.3.1 Assessment Grouping of TFE Applications during Initial Screening

TFE applicants may be required to group or split the original *TFE application* in cases where multiple rationales, different mitigation measures for varying asset types or different paths to achieve strict compliance are provided. These applications will therefore be unique in terms of their rationale and mitigation path thereby simplifying the tracking of each *TFE application* to ensure clear, effective assessment and resolution.

2.3.2 Part A Payment

A *TFE applicant* is required to submit to the *IESO*, along with the initial Part A screening application, a payment in the amount of \$ Cdn 1350.00 (plus HST)⁸.

Details on how the Part A payment is made to the *IESO* are available in *IESO- Form-1717: Technical Feasibility Exception Application, Part A*:

http://www.ieso.ca/imoweb/pubs/marketAdmin/ma_f1717_TFE_Application_PartA.doc

2.3.3 Acceptance or Rejection of Part A

MACD will use the Part A required information to either accept or reject the *TFE application*. The basis of application acceptance or rejection will depend on whether each of the criteria identified in section 2.3 have been met.

A letter entitled “Notice of Acceptance or Rejection of Technical Feasibility Exception Part A Applications” is sent by MACD to the *TFE applicant* informing them of their *TFE* acceptance or rejection.

If accepted, notification of the acceptance will include:

- a list of the accepted *TFEs* into assessment groupings, including their unique MACD identifiers;
- indication that the Part A invoice for \$Cdn 1350.00 + HST per/group of *TFE applications* is now due;
- indication that an executed agreement (see Section 2.4.2) for the Part B substantive review will follow, requiring the *TFE applicant's* signature;

⁸ Note that this cost is subject to change based on future assessments and/or changes to initial screening costs.

- indication that in order for the Part B substantive review to proceed, a deposit is required, as specified in the executed agreement; and
- the date by which a proposed schedule for the Part B submissions will be required by MACD.

An email is sent to the *TFE applicant* notifying them that their acceptance/rejection letter is posted in the portal for their review. The *TFE applicant* is then required to upload to the portal the proposed Part B schedule by the date identified in the letter. If the *TFE* is rejected, the *applicant* is notified in writing by MACD, along with an explanation and rationale for the *TFE* rejection. Next steps are then discussed with the *TFE applicant*, as required.

2.4 Part B – Substantive Review

Once the *TFE application* has been accepted and the *applicant* has uploaded their Part B schedule into the portal, the Part B substantive review process begins.

The objective of the *TFE* Part B substantive review is to determine whether the *TFE application* will be approved or disapproved. This assessment involves a review of the *applicant's* Part B submissions to determine whether the *applicant* has substantiated the approval criteria⁹ and whether the mitigations and compensating measures proposed by the *applicant* are sufficient to fully mitigate the risk created by non-compliance with the CIP requirement for which the *applicant* has applied. In some cases, approval is granted upon the *applicant's* submission of a reasonable compliance and/or mitigation plan, as determined by MACD.

The *TFE* substantive review is intended to be a collaborative exchange of information to maximize *TFE application* success. A *TFE* assessment is neither a full nor a partial audit of *NERC* CIP standard compliance of the *applicant*. The assessment is, therefore, limited in scope to information relevant to the *application* assessment. However, in some cases, it is necessary to review information related to CIP standards that are not the subject of the *application* when offered as compensating and/or mitigating measures. Should this occur, the MACD review team may comment on the *applicant's* compliance with *NERC* CIP standards. If the MACD review team, during its review, suspects a possible breach of a CIP standard, it will advise the *applicant* and refer the matter to MACD investigative staff for follow-up. In either case, any compliance opinions or advice given by the MACD review team to the *applicant* is non-binding on the final decision made by MACD regarding *application* approval or disapproval, or on any future decisions with respect to CIP standard compliance by the *applicant*.¹⁰

If MACD determines that an on-site visit is warranted as part of the substantive review, a request is made to the *TFE applicant*. This contrasts with *NERC* who plan to view on-site information during routine spot-checks or audits-

⁹ The approval criteria are those outlined in section 3.1 of the *NERC TFE Process*.

¹⁰ Additional information may be requested by MACD to assist both in understanding the nature of the *applicant's* system and to assist in making an informed judgment on the *TFE*. This ultimately enables a collaborative exchange of information between both parties.

2.4.1 TFE Part A and Part B Correlation Review

MACD reviews the *TFE* Part B information against the original *TFE* Part A information to ensure continued alignment. If there is misalignment, *MACD* will request written notification from the *applicant* explaining any variances between the Part A and Part B submissions. The explanation of variances is submitted by the *TFE applicant* to *MACD* through the portal.

Supporting information requested from the *TFE applicant* may at this stage include:

- updated list of affected cyber assets;
- updated basis for the submission of the *TFE application*;
- vendor attestations concerning their products and product directions;
- vendor technical manuals and configuration settings for the cyber assets in question;
- updated mitigation measures;
- updated description of path to achieve strict compliance; or
- updated dates associated with the implementation of mitigating measures or the achievement of strict compliance.

The correlation review takes into account that during the time between either the initial submission or acceptance of the *TFE* Part A *application* and the actual site visit (see Section 3.0), the *applicant* may have progressed significantly in researching and understanding the security features of the various cyber assets included within a *TFE application*, and may have also made progress in the implementation of mitigating measures or in the achievement of strict compliance.

The *applicant* is required to submit an updated Part B form to the portal, where the form contains the details of the change in device status within a *TFE application*. If strict compliance has been achieved and verified by *MACD*, then a *TFE* can be terminated and all charges for the processing of the Part B information for the specific *TFE* are stopped. The *applicant* is only billed for the Part B *TFE* assessment costs until the date of the verification of strict compliance by *MACD*.

2.4.2 TFE Cost Recovery Agreement

Prior to the commencement of the Part B substantive review, the *TFE applicant* is required to submit an executed *TFE* Cost Recovery Agreement (“Agreement”) in which the *TFE applicant* agrees to pay the *IESO* an amount equal to all reasonable costs incurred by the *IESO* in assessing the *TFE application*. These costs include, but are not limited to:

- costs and expenses incurred by the *IESO* relating to consultations with *NPCC* or *NERC* in its assessment of a *TFE application*;
- costs and expenses of *IESO* staff or a third party contracted by the *IESO* to conduct a review of a *TFE application*; and
- travel costs and expenses associated with *IESO* staff or a third party contracted by the *IESO* to come on-site to access either information or equipment that a *TFE applicant* is unable or unwilling to provide off-site.

A *TFE applicant* is responsible for all reasonable costs associated with an assessment of its *TFE application*. The *TFE* cost recovery principles ensure that a *TFE applicant* pays for such costs, from submission of a *TFE application* until the *TFE application* is withdrawn, rejected, approved or disapproved.

Once the agreement has been reviewed and agreed to by both the *IESO* and the *TFE applicant*, the agreement is signed by the *IESO*. The contract becomes effective as of the date the agreement is counter-signed by the *TFE applicant*.

2.4.3 Part B Invoice

The cost of the Part B substantive review is based on an estimate of work provided in the contract to complete the TFE assessments. For typical applications, this amount is fixed across all *TFE applications* and based on an assessment of the average cost of conducting a *TFE* substantive review. This estimate may vary depending on the complexity of the assessment.

The *TFE applicant* is given thirty (30) days to pay the invoice, from the invoice date.

NOTE: Should a delay in the Part B payment process occur, the *TFE applicant* is notified by phone and email by MACD that assessment work on the Part B substantive review will not proceed unless the Part B invoice is paid in full. MACD will cease further work on these *TFEs* until the Part B payment is received in full by a specified deadline. Not meeting that deadline will result in a referral of the matter for possible enforcement actions. The *applicant* is still responsible for payment of any process costs from the time of the acceptance of the Part A application, regardless of whether the process ends at this point.

If the payment is not received by one month after the specified deadline in the letter from the Supervisor, Reliability Standards, MACD will issue a notice disapproving all *TFE applications* and notifying the *applicant* that a referral to enforcement has occurred.

2.4.4 Part B Cost Threshold

For each *TFE application*, the *IESO* will establish a cost threshold or subsequent cost thresholds which it considers to be reasonable and which will form part of the executed agreement. The *IESO* will monitor expenditures against the cost threshold of a *TFE application* and where that threshold is reached, the *IESO* will:

- advise the *TFE applicant* of the work and costs incurred to date; and
- provide an estimate to the *TFE applicant* of the further work and costs necessary to complete the assessment of the *TFE application*.

An estimate of the further costs necessary to complete the assessment of the *TFE application* will form an addendum to the original executed agreement.

The *TFE applicant* may choose to continue with the assessment of the *TFE application* or discontinue the assessment of the *TFE application* by withdrawing the *TFE application*. In the event that the *TFE applicant* chooses to discontinue the assessment by withdrawing the *TFE application*, the *IESO* will issue an *invoice* to the *TFE applicant* for all reasonable costs incurred by the *IESO* to that point. The MACD review team will then refer the matter to MACD investigations for possible enforcement actions. The *IESO* will submit an *invoice* to the *TFE applicant* upon completion of the processing of the *TFE application* in an amount equal to all of the *IESO's* costs and expenses relating to the processing of the *TFE application* less the amount of any deposit paid by the *TFE applicant*.

A *TFE applicant* is required to pay the *IESO* the amount owing within thirty (30) days of the *invoice* date.

2.4.5 Content Requirements for Part B Submissions

Each *TFE applicant* is required to submit Part B information as set forth in Appendix 4D of the NERC Rules of Procedure - Section 4.3.2. This information contains the detailed material to support a *TFE application* including:

- locations of the Covered Asset(s)
- statement of basis
- compensating and/or mitigating measures
- assessment of impact on the Bulk Electric System
- schedule of implementing the compensating/mitigating measures
- plan and schedule for terminating the *TFE*, or
- explanation and evidence of why an open-ended *TFE* is requested
- acknowledgement of Quarterly and/or annual reporting requirements
- identification of any classification/protection of any data needed to support the *TFE*
- signed and dated statement from the Senior Manager approving the content of the *TFE* request

Although there is no specific form or format for Part B, it must contain all the necessary information as specified in the *NERC TFE Process*. A template for Part B submissions is offered as a guide for *TFE applicants* (see IESO_GDE_0305 in Appendix A).

Part B required information must be available at the *TFE applicant's* location for review by *MACD* beginning on the date the *TFE application* is submitted.

Note: *TFE applicants* are required to file all or a portion of the Part B required information with *MACD*, except information where disclosure is prohibited by law (see Section 3.2 below).

Once the Part B required information is received through the portal, *MACD* will:

- review each *TFE* for completeness, including reviewing supporting evidence for basis, substantiation, mitigating and/or compensating measures;
- assess whether the approval criteria is sufficiently substantiated for each *TFE application*;
- determine if one or more physical inspections of the Covered Asset(s) and related facility(ies) is required.

– End of Section –

3. TFE On-Site Visits

3.1 Purpose of On-Site Visits

TFE on-site facility visits are conducted to allow for a collaborative exchange of information between MACD and the *TFE applicant* in order to maximize the success of the *application*. On-site visits allow for viewings, demonstrations and physical inspections of equipment that are the subject of the *application*. These assist in developing an understanding of the nature and context of the *application*. On-site visits likely include the viewing of confidential information which is not permitted to leave the *applicant's* site but is required for the *TFE* assessment. Subsequent to a *TFE* approval, or as part of the termination or amendment process, on-site visits may be required to validate the implementation of the compliance and/or mitigation plan. On-site visits also allow for the inspection of documents that otherwise cannot be removed from the *applicant's* premises (see Section 3.2)

Subsequent to a *TFE* approval, or as part of the termination or amendment process, on-site visits may be required to validate the implementation of the compliance and/or mitigation plans.

3.2 Access to Confidential Information

Upon reasonable advance notice from the *IESO*, a *TFE applicant* must provide the *IESO* with access to confidential information and with access to the Covered Assets and the related facility(ies).

If a *TFE applicant* is prohibited by law from disclosing any confidential information to any person who is not an eligible reviewer¹¹, then such information will only be reviewed by a representative of the *IESO* who is an eligible reviewer.

The *IESO* and a *TFE applicant* will work cooperatively to access confidential or protected information¹² in a way that does not waive or extinguish the exemption of the confidential or protected information from disclosure.

3.3 Site Visit Rules of Engagement

MACD and the *TFE applicant* will work together to establish a time and date for any on-site visit(s). Prior to the commencement of the site visit, a number of issues are addressed:

- all members of the MACD review team sign the *IESO Code of Conduct* which requires that they adhere to the market rules with respect to the treatment of confidential information.
- the *applicant* produces for the MACD review team two hard copies of confidential information which cannot be removed from the site; and

¹¹ A person who has the required security clearances or other qualifications, or who otherwise meets the applicable criteria, to have access to confidential information, or information protected under “Ontario’s Freedom of Information and Protection of Privacy Act (“FIPPA”), as applicable to the particular information to be reviewed.

¹² Information protected under FIPPA.

- all *TFE* material produced as a result of the assessment is to be marked as “confidential” by the *applicant*.
- All members of the MACD review team shall follow the *applicant’s* safety and security procedures to ensure the safety of all persons and to protect the integrity of the *applicant’s* assets.

The MACD review team reviews the documents provided and may request additional supporting information or clarification, as required.

During the site visit, MACD makes an *applicant*-specific presentation outlining objectives, process, data, evidence retention and requirements for the final assessment report. The presentation is sent to the *applicant* via email approximately one week in advance, thereby allowing the *applicant* enough time to organize its staff and any security requirements associated with the site visit.

Upon completion of MACD’s presentation, the *TFE applicant* delivers a brief presentation describing the company’s organizational structure and computer systems as relevant to the *TFE application*.

If necessary, MACD may request to view/inspect the facilities that are part of the *TFE application*. The inspection would enable the MACD review team to view the *TFE applicant’s* basic network architecture and cyber assets within the Electronic Security Perimeter (ESP), review the ESP drawings and conduct an inspection of the Physical Security Perimeter (“PSP”). As part of this process, MACD will review:

- how each access point to the ESPs has been defined and protected;
- network architecture diagrams;
- network drawings and layouts showing ESP perimeters;
- device and product specifications and configurations;
- firewall rules; and
- project plans and schedules for the implementation of mitigating measures or compliance plans.

Following the inspection of the facility, the MACD review team may suggest to the *TFE applicant* avenues of research to substantiate the approval criteria, discuss the strength of the compensating and/or mitigating measures and make suggestions regarding implementation plans. MACD will make clear to the *TFE applicant* the actions and/or evidence necessary for an approval recommendation.

In general, the submission of a *TFE application* will require that the *applicant* provide a proposed mitigation plan which achieves an equivalent level of protection that would have been provided by strict compliance. This mitigation plan typically uses a different set of technical and/or procedural protective measures from those specified in the original *NERC CIP* requirement.

In order to assess the strength of the *applicant’s* compensating and/or mitigation measures, the MACD review team will ask the *applicant* to provide information which fully supports an understanding of these measures. For example, an explanation of the network architecture and the cyber assets included within the Electronic Security Perimeter (ESPs) that the *applicant* has defined may be required. If further clarity is needed, the *applicant* may be asked to explain how each access point to the ESP(s) has been defined and protected. This information may include architecture diagrams, network drawings showing ESPs and PSPs, device and product specifications and configurations, firewall rules, project plans and schedules for the implementation of mitigating measures, etc. In most cases, for confidentiality reasons, the *applicant* may not wish to allow some or

all of this information to leave their premises. In such cases, one or more site visits may be conducted by the MACD review team to review and assess this confidential information as part of an open and collaborative dialogue with the *applicant*.

As an example, if the *applicant* has applied for a *TFE* to support the lack of malware protection for a Critical Cyber Asset within an ESP due to technical infeasibility, some or all of the below areas of exploration by the MACD review team would be pertinent in assessing the adequacy of the mitigation plans, if offered as mitigating or compensating measures:

- the construction of the ESP and the controls for each of its access points;
- the strength of the firewall rules for a firewall protecting the ESP, and the possible use of an intrusion detection/prevention module or malware prevention module built into the firewall;
- the restrictions placed on the remote management of a firewall protecting the ESP;
- the strength of the physical protective measures used to secure the PSP, and, by extension, the ESP and its resident cyber devices;
- the ability for devices within an ESP to alert for the presence of cyber security events;
- the use of host or network-based intrusion detection and prevention devices, and the frequency of signature update for these devices;
- the use of malware prevention software on other devices within the ESP, and the frequency of signature update for this software;
- the patch management process and timelines;
- the integrity measures employed by the device that is the subject of the TFE application, where the integrity measures may include vendor signing of implemented code, regular comparison of running code, application white-listing, etc;
- the process for testing and updating new code for the cyber devices within the ESP as part of a Change and Configuration Management Program;
- the use of hardware port restrictions on network switches within the ESP so as to reduce the possibility of inadvertently introducing infected devices into the network within the ESP;
- the procedural and technical restrictions imposed regarding the use of removable memory type devices within the ESP as they could be the source of malware infections;
- the robustness of the response and recovery processes articulated by the TFE *applicant* should there be a need to address an actual malware intrusion; and,
- the comprehensiveness of the training provided by the TFE *applicant* to responsible staff surrounding the protection of critical cyber assets.

The TFE assessment also includes a review of the effectiveness of the timing and manner of the compensation/mitigations and/or compliance plans provided by the TFE *applicant*. Finally, an adequacy assessment is conducted of the possible solutions researched. This assessment also includes the timing of both permanent solutions and temporary mitigation measures that need to be implemented to address the risk to the Bulk Electricity System created by the CIP non-compliance.

3.4 TFE Data and Evidence Retention

At the conclusion of the site visit(s) the *applicant* is required to ensure that all sensitive information (electronic, hard copy or otherwise) provided to support the *TFE application* is properly marked with the appropriate confidentiality classification. Note that where possible, information provided by the *applicant* should be in electronic format. In addition, the *applicant* must ensure that a copy of all electronic evidence provided to support the *TFE* request is uploaded to a single, secure, encrypted, password protected flash drive at the end of the site visit.

The *applicant* will be asked to seal in a Tyvek envelope a single copy of all hard copy and electronic *TFE* assessment information which, due to its confidential nature, cannot leave the premises of the *TFE applicant*. The seal is signed by the MACD review team leader as well as the designated *TFE applicant's* designated authorized representative. The envelope shall be appropriately dated and labelled. The sealed evidence is retained in a way that allows it to be preserved as it existed at the time of the *TFE* assessment. The envelope with the sealed information is kept secure at the *applicant's* premises for a minimum of seven (7) years past the date of expiry of the *TFE*.

3.5 On-Site Exit Presentation

Once the applicable evidence is secured and sealed, the MACD review team conducts an exit presentation that explains to the *applicant* the next steps in the *TFE* process, including:

- requirements of the *TFE* assessment report, particularly, the understanding of the network architecture and any mitigation measures;
- verification of Part A and Part B application alignment;
- verification of “required actions” agreed to by *TFE applicant*;
- timing of formal notification of approvals and disapprovals;
- ongoing *TFE* reporting requirements; and
- *TFE* maintenance requirements including revisions, terminations, amendments and new submissions.

– End of Section –

4. TFE Assessment Report and Approval/Disapproval Process

4.1 TFE Assessment Report

The assessment report contains preliminary *TFE application* decisions by MACD's management and includes the following information:

- preliminary decisions regarding the approval/disapproval of each *TFE application*;
- an assessment of whether the *applicant* has substantiated the approval criteria for each *TFE application*;
- an assessment of whether the *applicant's* mitigating and/or compensating measures offsets by an equal amount the risk created by its non-compliance with the CIP standard;
- an assessment of the reasonability in the timing and manner by which the *applicant* will achieve strict compliance with the relevant *NERC CIP* requirements;
- an assessment of the acceptability of the overall residual risk to the *Bulk Electrical System* following the application of mitigating measures within each *TFE*;
- the outstanding list of actions (which may include options) which the *applicant* is required to undertake in order to obtain an approval for a *TFE application* that has been preliminarily disapproved;
- the milestones the *applicant* is required to achieve with respect to the implementation of mitigating measures;
- the steps in achieving strict compliance in order to maintain *TFE* approval;
- a schedule and requirements for regular progress reporting to MACD regarding the implementation plans for compliance and mitigation(s) for a *TFE application* and research required to be conducted; and
- a list of information that is required to be sealed at the *applicant's* site.

Through the *TFE* substantive review process, MACD will identify those aspects of the *TFE application* that require certain actions for approval. Prior to the final approval/disapproval, MACD will provide the *TFE applicant* with a preliminary assessment report outlining any required actions to approve the *TFE application*¹³.

¹³ The accuracy of these assessment reports are based solely on the information provided by the *applicant* with respect to the configuration of their cyber assets and the information collected by the *TFE* assessment staff during the substantive review. Should MACD determine that the information used to form the basis of *TFE* approval or disapproval is in fact incorrect, inaccurate, invalid, or incomplete, and had a material effect on the *TFE's* approval or disapproval, MACD may amend or terminate the approved or disapproved *TFE*. In addition, MACD may initiate compliance actions as a result of a termination or amendment to a *TFE*.

Prior to a final decision being made by MACD, the *applicant* is required to respond to the preliminary *TFE* assessment report by verifying:

1. the validity, accuracy and completeness of the technical information in the report;
2. any changes from the original *TFE application*;¹⁴
3. that the report accurately reflects those compensating and/or mitigating measures or compliance plans the *applicant* has voluntarily undertaken or will undertake; and
4. the *applicant's* agreement to the terms, conditions and required actions identified in the report for each *application*. For *applications* where disapproval is recommended, the *applicant* must confirm whether they will complete the required actions by the time specified in the report.

Following consideration of the written submission, MACD will issue to the *applicant* the final *TFE* assessment report containing MACD's final determinations and the *applicant's* agreed-to terms, conditions and required actions for *TFE* approval. This is not an opportunity for the applicant to raise disputes regarding the report determinations unless they are affected by factual inaccuracies or omissions. Any failure to fulfill the agreed-to terms, conditions and required actions will trigger a reconsideration of the approved *TFE* and may result in:

1. an amendment or termination to the approved *TFE*, and/or;
2. the initiation of a compliance investigation and enforcement action, as the case may be.

4.2 Required Actions and Conditions of TFE Approval

To receive approval for each *TFE application*, the *applicant* must complete the required actions specified by MACD by the dates indicated in the assessment report. Required actions are the mitigations that the *TFE applicant* is required to undertake as a condition of *TFE* approval.

MACD will monitor progress on the required actions through status reports provided by the *applicant* at the frequency defined in the report. The approval or disapproval of each *TFE application*, and any conditions which the *applicant* is required to fulfill for *application* maintenance, are noted in the assessment report (see Section 5.0).

4.3 Enforcement Action for the Period a TFE Application is being Reviewed

This section corresponds with the *NERC TFE* Process section entitled: "No Findings of Violations or Imposition of Penalties for Violations of an Applicable Requirement for the Period a *TFE* Request is Being Reviewed", but has been adapted for application in Ontario.

Under the *market rules*, Chapter 3, section 6, MACD has discretionary authority to take enforcement actions upon becoming aware of a possible breach of the *market rules*. Unlike the authorities granted to *NERC*, which guarantees that penalties and findings of a breach will not occur during the period of *TFE application* review, MACD has not been granted such authority under the *market rules*. Instead, the Ontario-adapted process provides *TFE applicants* a "suspension period" where MACD will not initiate enforcement actions for non-compliance with CIP standards during the period of application

¹⁴ It is expected that during the course of the *TFE* process, changes from the original Part A or B submissions may have occurred regarding the equipment applied for, mitigation/compensating measures or mitigation/compliance plans and schedules or otherwise. Such changes need to be cited in the written submission to MACD.

review. Note that MACD has the discretion to terminate the suspension period and initiate compliance enforcement actions for the entire *TFE application* review period (from the date an application is submitted to the Effective Date¹⁵) where it disapproves a *TFE application* for the following reasons:

- MACD finds a *TFE applicant* has breached section 11.2.1 or 11.3.1 of Chapter 1 of the *market rules*; or
- any *TFE application* information requirements are not satisfied within the MACD-specified timeframe.

Subject to the foregoing paragraphs, the suspension periods described below are available to *TFE applicants*. MACD will not initiate compliance enforcement actions for the period from:

- (i) the earlier of (a) the date that the *TFE application* is accepted as complete, and (b) the date that is sixty (60) calendar days after submission of the *TFE application*,
to:
- (ii) (a) the Effective Date that the *TFE application* is rejected, or (b) the date that the *TFE application* is approved, or (c) the Effective Date that the *TFE application* is disapproved, whichever is applicable.

– End of Section –

¹⁵ The “Effective Date” as defined in the *NERC TFE Process*, is “the date, as specified in a notice rejecting or disapproving a *TFE Request* or terminating an approved *TFE*, on which the rejection, disapproval or termination becomes effective”.

5. TFE Maintenance

In order to maintain approval once granted, the *applicant* is required to maintain the current mitigations as discussed in the report and implement others according to the dates specified in the report, as the case may be. Any failure to comply with these conditions, including the reporting requirements, could result in either a termination or amendment to the *TFE*. In addition, MACD may initiate compliance actions as a result of a failure to comply with these stated conditions.

The term of the *TFE* is the duration of its effectiveness. *TFEs* are not approved for the life of the equipment but they may be approved for an undefined term (“open-ended”). Otherwise, *TFE* terms all have end dates.

The term of the *TFE* approval, as noted in the assessment report, may contain a fixed date for the achievement of strict compliance. These dates may be dependent, for example, on when the vendor can provide the *applicant* with a compliant version of the devices in question. For those *TFEs* listed as “open-ended”, the *applicant* is required to conduct a review, according to the frequency noted in the report, to determine whether changes to vendor products and equipment covered by the approved *TFE* are now compliant with the CIP requirement. When a compliant version of the device or devices in question is available, then a fixed date for the term of *TFE* approval can be discussed and agreed to with the *TFE applicant*.

Once the *applicant* can confirm that strict compliance has been achieved for equipment covered by an approved *TFE*, the *applicant* is required to notify MACD. Strict compliance can be verified by either submission of supporting documentation or by an on-site visit in which a visual inspection and/or testing of the equipment is performed.

5.1 Implementation, Reporting and Periodic Review of Approved TFE

In accordance with section 3.2A.9, Chapter 5 of the *market rules*, all *TFE applications* which have been approved and remain in effect will be subject to reporting requirements and periodic review to verify continuing justification of the *TFE*.

TFE applicants with approved *TFEs* remaining in effect will be required to submit to MACD a *TFE Maintenance Report* according to a schedule based on their *TFE* application requirements. These reports are due one month following the last date of the period to which they apply. These reports will require the *TFE applicant* to submit separate information regarding any updates concerning each unique cyber device or asset type. Although additions, removals or changes regarding cyber devices or asset types will need to be reported on a semi-annual basis, any open-ended *TFEs* requiring research into vendor offerings of compliant solutions will only require reporting on an annual basis. Certain compliance plans may require quarterly reporting.

Information in this report therefore includes, but is not limited to:

- *TFE* ID number
- applicable *NERC* CIP standard requirement number
- equipment vendor, device and model number
- current quantity of devices covered by the approved *TFE*

- a description of the progress and date for implementing outstanding compensating and/or mitigating measures
- a description of any updates regarding research and/or analysis with vendors for *NERC* CIP compliant solutions (yearly only)
- a description of the progress and date for implementing a compliance plan (if specified as a condition of *TFE* approval)
- a description of any significant work items planned for the next reporting period
- comments regarding overall changes or updated information regarding the *TFE*

At the sole discretion of MACD, a periodic review of an approved *TFE* may be conducted following the approval of the *TFE application*. If MACD determines that a site visit is warranted, the periodic review may include visits to the facilities that are the subject of the approved *TFE* to verify, for example, any information submitted to substantiate the original *TFE* or subsequent revisions to this information and the continuing need for the *TFE*. Testing may also be performed during site visits to ensure that the measures implemented by the *TFE applicant* are consistent with the terms and conditions of the approved *TFE* and are effective either as compensating measures or in achieving compliance with the applicable requirement.

5.2 Maintenance Costs

In accordance with section 3.2A.10 of the *IESO* market rules, the *IESO* may periodically invoice a *TFE applicant* for the costs and expenses for maintaining the approved *TFE* until such a time as the *TFE* is no longer in effect, less the amount of any deposit paid under Section 2.4.2 of this procedure. The *TFE applicant* has 30 days from the invoice date to pay the *IESO* the full amount owing on the invoice.

Those *TFE applicants* with an executed *TFE* cost recovery agreement already in place with the *IESO* are required to sign a letter acknowledging the authority of the *IESO* to recover costs incurred during the maintenance phase of an approved *TFE*.

5.3 Amendment of an Approved TFE

This section corresponds with the *NERC TFE* Process section entitled: “Amendment of a *TFE* Request or Approved *TFE*”, but has been adapted for application in Ontario.

MACD may amend an approved *TFE* as a result of an incident, spot-check, audit, periodic review, or any other discovery method. In addition, MACD may amend a *TFE* as a result of changes in circumstances from those that existed at the time the *TFE* was approved.

5.4 Termination of an Approved TFE

This section corresponds with the *NERC TFE* Process section entitled: “Termination of an Approved *TFE* Request”, but has been adapted for application in Ontario. An approved *TFE* shall terminate on its expiration date, unless it is terminated at an earlier date as a result of an incident, referral, spot check, audit, periodic review, or any other discovery method. When the *TFE* applicant reports that strict compliance has been achieved, MACD may choose to verify compliance by any one or more of the following means: requesting supporting documentation, a site visit to perform visual inspection, or testing of the equipment which has achieved strict compliance, as the case may be.

5.5 Transfer of an Approved TFE

The current *NERC TFE* Process does not address the transfer of an approved *TFE*. In contrast, the Ontario-adapted process allows for the transfer of a *TFE* from one corporate entity to another as a result of changes to asset ownership. An abbreviated approval process will be developed for such circumstances with stakeholder involvement at a later date.

5.6 Hearings and Appeal Process for TFE Applicants

This section corresponds with the *NERC TFE* Process section entitled: “Hearings and Appeal Process for Responsible Entity”, but has been adapted for application in Ontario.

A *TFE applicant* whose *TFE application* has been rejected or disapproved, or whose approved *TFE* has been terminated, amended, or transfer denied is entitled to the *IESO* dispute resolution process as outlined in the *market rules*. A *TFE applicant* is also entitled to the *IESO* dispute resolution process for any amount invoiced with respect to the cost of a *TFE* assessment.

5.7 Confidentiality of TFE Applications and Related Information

This section corresponds with the *NERC TFE* Process section entitled: “Confidentiality of *TFE* Requests and Related Information”, but has been adapted for application in Ontario.

Any technical material received or produced by the *IESO* surrounding a *TFE application* will be maintained as confidential in accordance with the confidentiality requirements as outlined in Chapter 3, section 5 of the *market rules*. Any finance, contract or other administrative information regarding the *TFE* process will be managed by *IESO* staff with the same level of consideration to confidentiality.

5.8 Reporting to Standards and Regulatory Authorities

This section corresponds with the *NERC TFE* Process section entitled: “Annual Report to FERC and Other Applicable Governmental Authorities”, but has been adapted for application in Ontario.

The *IESO* will facilitate reporting on Ontario *TFE* status to *standards authorities* including *NERC*, *NPCC* and the provincial regulator, as required.

In accordance with the market rules, in reporting to *NERC* and *NPCC*, MACD will maintain the confidentiality of *TFE application* data and details provided to the *IESO*.

5.9 Contact Information

Initial queries, questions or concerns regarding the Ontario-adapted *TFE* process should be directed to customer.relations@ieso.ca. Once the *TFE* process has been initiated, all subsequent correspondence will occur with MACD through the procedure outlined in this document.

– End of Section –

6. Guide to IESO Portal Collaboration

6.1 Introduction

The *NERC* CIP Technical Feasibility Exceptions portal collaboration community (“portal”) is used to exchange and share confidential information and documents between TFE *applicants* and MACD.

The responsibility for applying for a *TFE* is borne by the TFE *applicant*. Once the *TFE applicant* has notified MACD that they intend to apply for a TFE(s), the process of registering the *TFE applicant* on the portal begins.

This section outlines specific information on functionality within the *applicant’s TFE* portal collaboration community. General information on the portal, including logging on and navigating, is available in the [Guide to IESO Portal Collaboration](#).

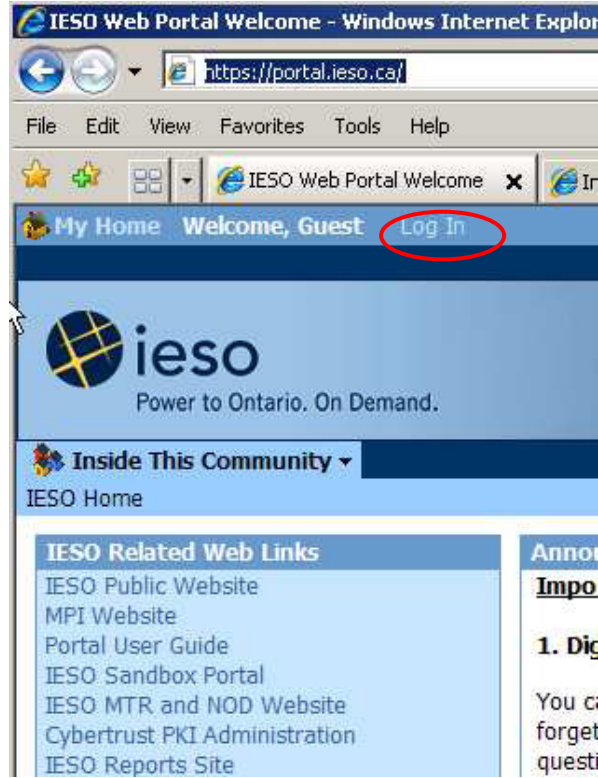
MACD will notify the *TFE applicant* once their portal access has been established and will indicate to them their username and password needed to access the portal. For assistance with user ID and passwords, please contact MACD at macd.tfe@ieso.ca.

Note: Not all users may see or have the permissions to perform all functionality described within this guide.

6.2 How to Access Portal Collaboration

Your portal collaboration community can be accessed by:

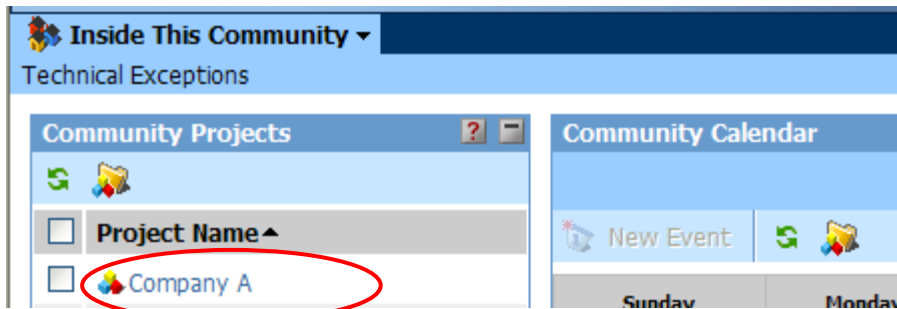
1. Typing <https://portal.ieso.ca/> on your browser or **Ctrl + Click** the link.
2. Click **Log In**



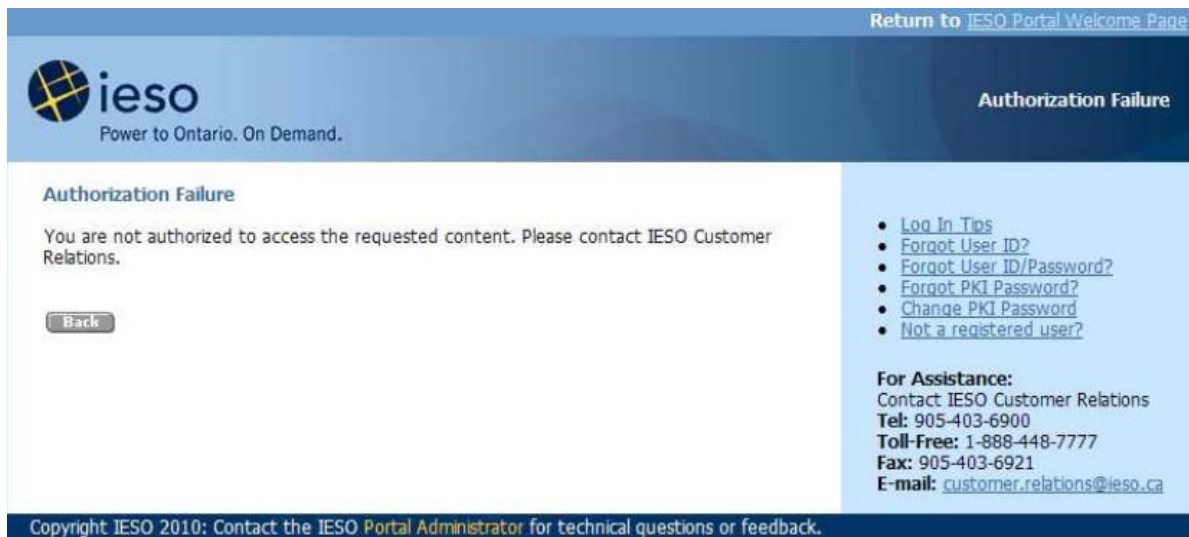
1. Enter your **User ID** and **Password**
2. Click the **NERC CIP Community** tab



3. Click the link under **Project Name**. For example: “Company A” user will see the example below:

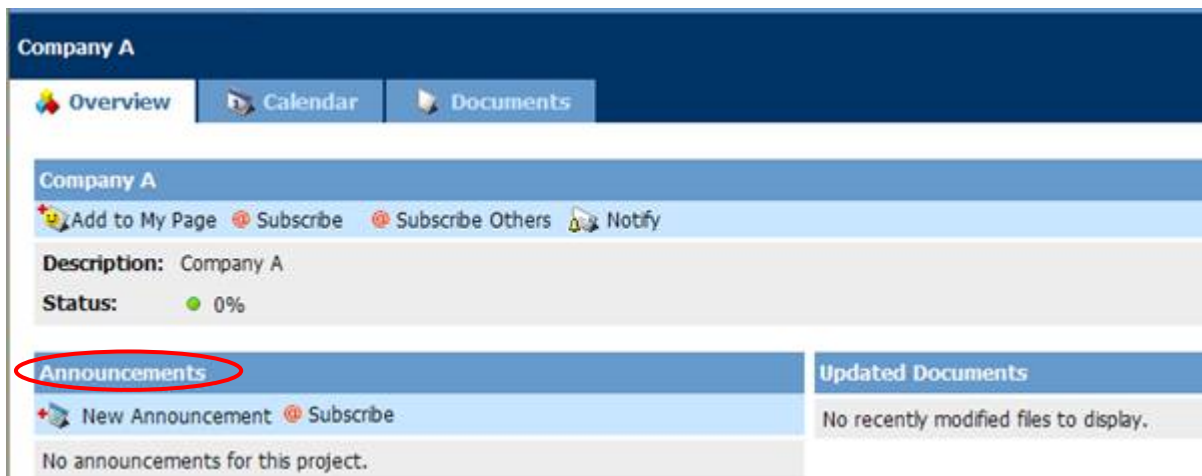


4. Access to the NERC CIP collaboration community is strictly controlled and monitored. You will see the following screen if you do not have the required access permissions. Please contact **IESO Customer Relations** for assistance.



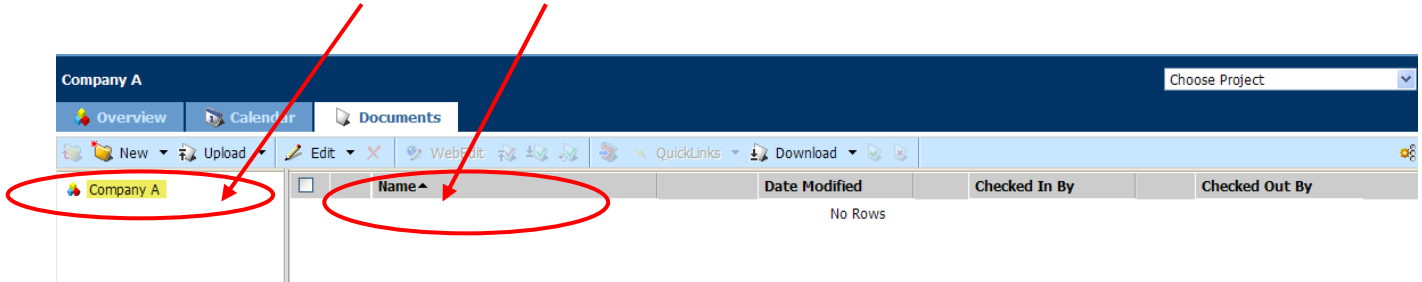
6.3 Overview

This page will contain any new **Announcements** that the *NERC* CIP Project Leaders may publish. You are also able to see the most recent documents that were uploaded for review.



6.4 Documents

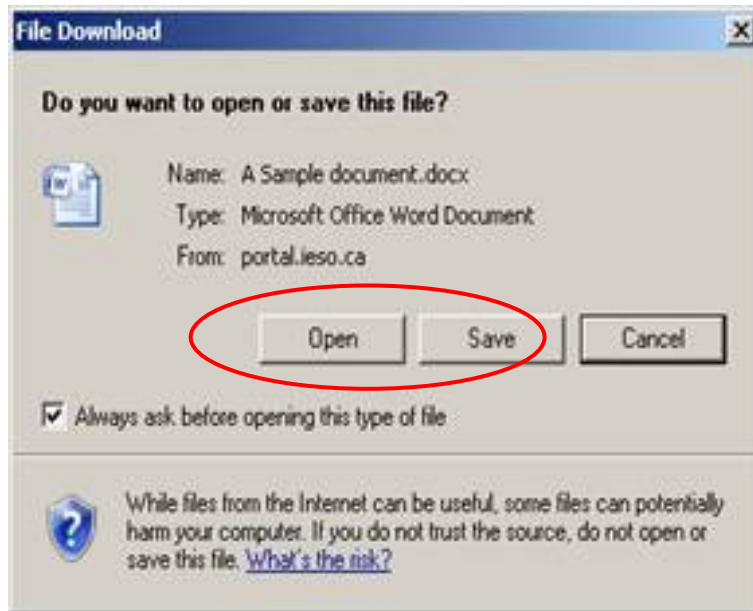
This location contains **folders** with **documents** for your review.



Please contact **IESO Customer Relations** for further information on the process for creating/uploading documents.

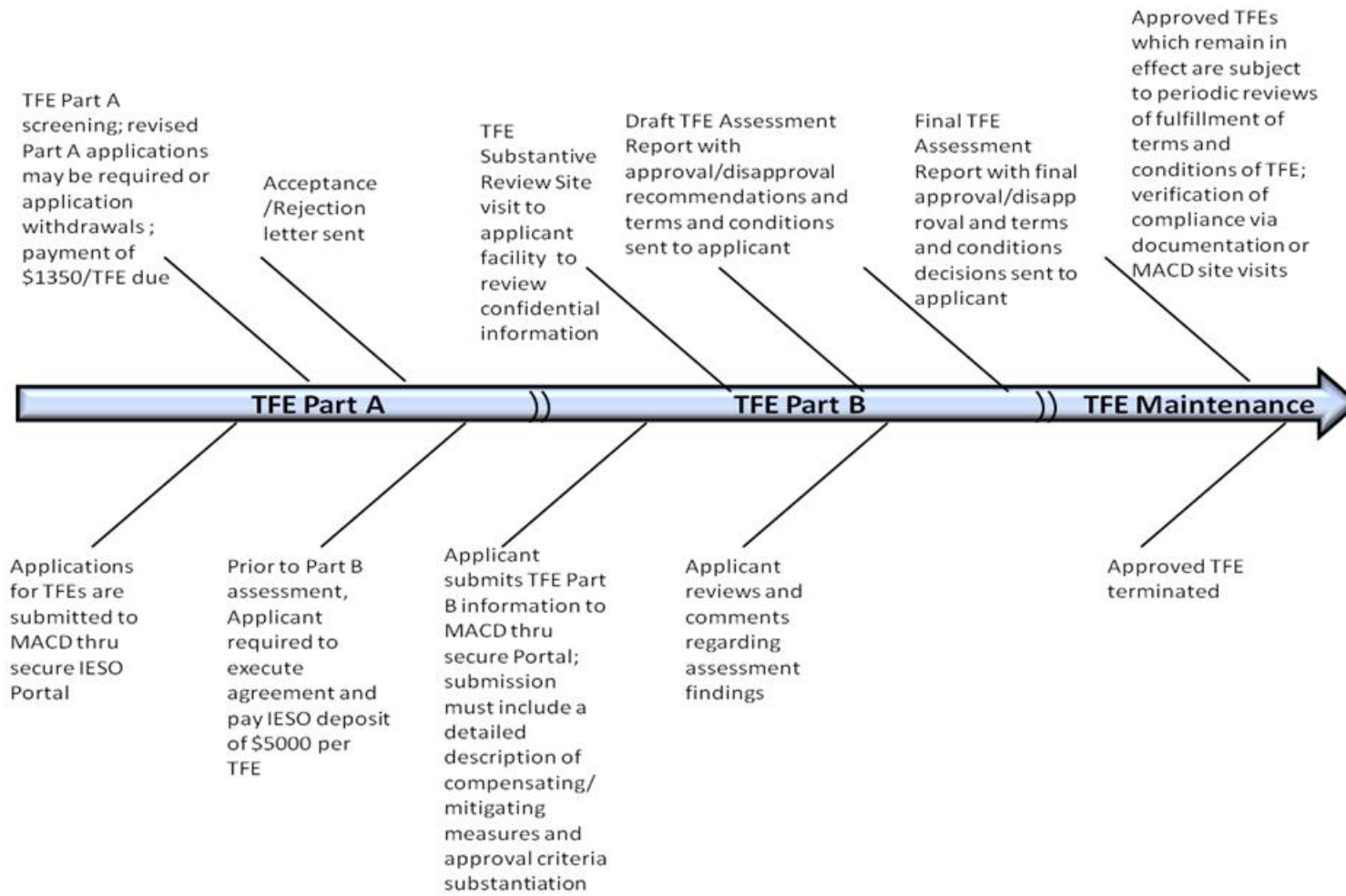
6.5 Opening Documents

1. Click on the document.
2. The following pop up will appear. Click **Open** to view the document. Click **Save** if you need to save the document to a different location and follow instructions.



– End of Section –

Diagram A: Ontario TFE Process



Appendix A: Forms and Agreements

This appendix contains a list of the forms and agreements associated with the *Technical Feasibility Exception* process.

These forms and agreements are available on the *IESO* web site at <http://www.IESO.ca/imoweb/marketComp/TFE.asp> or by contacting MACD at macd.tfe@ieso.ca.

Form or Agreement Name	Form Number
Technical Feasibility Exception Application – Part A	IESO_FORM_1717
Technical Feasibility Exception Application – Part B	IESO_GDE_0305
TFE Cost Recovery Agreement Template	IESO_AGR_0023

– End of Section –

References

Document Name	Document ID
Procedure for Requesting and Receiving Technical Feasibility Exceptions to NERC Critical Infrastructure Protection Standards (Appendix 4D to the Rules of Procedure) http://www.nerc.com/files/Appendix4D_TFE_Procedures_20110412.pdf	April 12, 2011

– End of Document –