

# Appendix D

## Progress on Recommendation No. 4

The area with the most progress is the adoption of mandatory consensus reliability standards. The RCA's June 2015 recommendation noted that reliability standards were voluntary and not all electric utilities had adopted the same standards. Railbelt electric utilities agreed to a single set of mandatory electric reliability standards for the Railbelt, filing consensus reliability standards with the RCA on April 17, 2018, that bridged inconsistencies between the existing reliability standards of the IMC and HEA/RRO. The Rail belt electric utilities proposed that implementation of the consensus standards be delayed until a year after adopted by a reliability organization. The reliability organization proposed by Railbelt electric utilities is the Rail belt Reliability Council (RRC), with functions that include (1) adopting and enforcing standards regarding system reliability, cybersecurity, and physical security; (2) conducting integrated resource planning for the Railbelt; (3) adopting and enforcing system-wide interconnection protocols; and (4) evaluating security-constrained economic dispatch. The Railbelt electric utilities proposed that the RRC be certificated and regulated by the RCA. The RRC is in the formative stages, with the Rail belt electric utilities anticipating filing a certificate application once the RRC business plan and supporting documents are completed.

On December 20, 2019, an informational filing was made with the RCA from the six Railbelt utilities:

The Organizational Development Team (ODT), is both pleased and proud to provide the Commission with a copy of the Railbelt Reliability Council Memorandum of Understanding (MOU), as signed by the respective general managers and chief executive officers of all six Railbelt Utilities. The MOU reflects the unanimous agreement of the six Railbelt Utilities and is the culmination of years of effort among the utilities; and, numerous meetings between the ODT and various stakeholders during this past year. The Railbelt Reliability Council (RRC), as envisioned in the MOU, meets the requirements established in the 2015 letter from the Commission to the Alaska Legislature indicating the need for reform on the Railbelt and requesting voluntary solutions from the utilities.

Many organizational issues remain to be resolved with the RRC. Many areas are yet to be addressed in the voluntary reliability standards. The RCA strongly believes that the statutory changes addressed in SB 123 must be enacted.

- **November 2015 RCA Public Meeting:** It was stated that the Commission would start discussions about opening an I Docket on the subject of reliability standards, stating “There are, at this point, two sets of reliability standards in the Railbelt. It's our understanding discussions are ongoing to reconcile some of the differences between those standards, and it seemed like spinning reserve was one of the key issues... would also say the utilities probably should look at their reliability standards.... We prefer voluntary

agreements and voluntary consensus with the people involved directly in the industry. But all I'll say is there is a large interest on the part of the Administration and various legislative offices to see something put forth that makes sense.”

- **May 11, 2016 – RCA Public Meeting:** The Commission moved to “open an I docket to gather relevant information concerning electrical reliability standards...focus[ing] first upon the Railbelt; and then as time and resources permit, to other aspects of the electric system in the state and what options that the Commission actually has in this area.
- **June 8, 2016 – Order I-16-002(1) Order Opening Docket And Requesting Responses:** “As a result of discussions with utility regulators throughout the United States and our monitoring of Alaska electric utilities, we have growing concerns about the need for stronger, enforceable reliability standards and for enhanced measures to improve operational, physical, and cyber security of Alaska’s electric utility systems. We open this docket to gather information and evaluate the reliability and security standards and practices of Alaska electric utilities and to consider the appropriate role for us to foster a more secure and reliable electrical system. While our initial focus will be on the Railbelt electrical system, we desire input from utilities and citizens from throughout the State of Alaska. ...we invite respon[s]es to the following questions Regarding electric utility operations in the Railbelt: 1. What progress and improvements have been made toward mandatory, enforceable operating and reliability standards since the information provided to us with a letter from the Intertie Management Committee dated January 27, 2014?3We also request an update on the work of Homer Electric Association, Inc. on operating and reliability standard development outside the Intertie Management Committee. 2. What is the current status and what are the key issues of discussions related to the sharing of spinning reserves among the Railbelt electric utilities? Regarding all electric utility operations throughout the State of Alaska: 3. What procedures and actions could we undertake to help improve the operational, physical, and cyber security of Alaska electric utility facilities? 4. What steps should we take to ensure appropriate levels of confidential treatment for the content of information we gather and of discussions or hearings we convene related to the operational, physical, and cyber security of Alaska electric utility facilities?
- **July 8, 2016 – Comments Regarding I-16-002(1):** Chugach Electric Association, Inc. (“Chugach”) submits the following high level comments at this preliminary stage of the Commission’s inquiry. 1- Along with other signatories of the Alaska Intertie Agreement, the Intertie Operating Committee, which includes Chugach representation, has been working collectively to develop a set of standards that will be acceptable to all Railbelt utilities. 2 As there have been, and continues to be, significant changes in the Railbelt generation mix, these spin allocations have been undergoing substantial review to assure

that they will be technically correct going forward. 3. Chugach recommends that the Commission avoid adoption of a set of “one-size-fits-all” regulatory mandates when it comes to operational, physical and cybersecurity. Chugach has established extensive security programs and policies based on internal evaluations, its operational circumstances, and advice from outsiders, including industry vendors and government agencies such as the Department of Homeland Security and NERC. Chugach has policies that fit the requirements of its system. Chugach has organized internal groups to address both physical security and cybersecurity 4. Chugach recommends that the Commission establish a program for on-site audits of utilities by the Commission and Commission staff. Such a program should be based on pre-determined audit criteria. This approach would avoid problems with the transmission and storage of confidential information

- **July 8, 2016 – *Alaska Intertie Management Committee's Response to RCA Order No. 1-16-002(1)***: Shortly after the interconnection of the Railbelt Northern and Southern systems in 1985, the newly formed Intertie Operating Committee (IOC) reviewed, modified, and adopted the North American Electric Reliability Council's Operating Guides for Interconnected Power Systems.... in 2005, the Railbelt Utility Group Manager (RUG) directed their respective operating managers to form an ad-hoc reliability Committee tasked with reviewing the most recent version of the North American Electric Reliability Corporation's (NERC) "Reliability Standards for the Bulk Electric Systems of North America" and further with modifying them and updating the Railbelt's planning and operating standards.... The "Ad-Hoc Railbelt Reliability Committee (RRC)", as it was called, working with the State of Alaska's "Alaska Energy Authority" (AEA), formed committee working rules and open public process for the standards review. Over the following several years the RRC reviewed some 650 pages of NERC standards. Drawing on this body of knowledge and on the existing Railbelt operation and planning standards as well as current Railbelt practices selective modified and updated the NERC standards. The standards that the IMC adopted in 2013 represented the output of this process." The IMC's operating and reliability standards are effective for transmission on the Alaska Intertie. It is expected that each of the individual utilities that comprise the IMC will adopt these standards for use with their respective systems. Homer Electric Association, Inc. (HEA) is no part of the IMC and therefore is not subject to the IMC's operating and reliability standards other than when HEA is using the Alaska Intertie. These operating and reliability standards are now being updated under the direction of the IMC. These Standards are not intended to include design specifications.
- **July 8, 2016 – *Matanuska Electric Association, Inc.'s Response to Order No. 1-16-002(1)***: ... the Railbelt utilities have all adopted operational standards and have now been working together for an extended period to reconcile and improve the existing standards and also adopt new standards to facilitate operational reliability. It should be

noted that despite the differences in the allocation of reserves between the Intertie Management Committee ("IMC") standards and the Homer Electric Association, Inc. ("HEA") standards, the Railbelt utilities have always operated to ensure the total reserves on the system are at least equal to the amount required by either standard... In MEA's opinion, the RCA's goal of improving operational, physical, and cyber security of Alaska electric utility facilities can best be met through the RCA's ongoing support of joint working groups of the utilities, similar to the existing IMC-led effort on unified Railbelt operational reliability standards. MEA's Chief Information Officer has already organized a discussion with representatives from Municipal Light & Power ("ML&P"), and two subsequent joint conference calls including representatives from MEA, ML&P, Golden Valley Electric Association, Inc. ("GVEA") and Chugach Electric Association, Inc. ("Chugach"), to explore the idea of forming such a utility working group to specifically address cyber security measures and accountability. Initial responses and participation from all four utilities have been positive, with substantial interest expressed in participating in such a group. If, as expected, a working group on cyber security is formed, HEA and other electric utilities in the state will be invited to participate.

- **July 8, 2016- *Homer Electric Association Inc's Response to Order I-16-002(1)*:** HEA commented that it “participated with the other Railbelt utilities in the development of the common rules and standards followed by the utilities engaged in interconnected operation long before establishing itself as a Load Balancing Authority.” It further stated that a “complicating factor in the discussions to reconcile the Railbelt standards has been the issue of how to deal with a set of six additional standards proposed by the Alaska Energy Authority (AEA) midway in the discussions among the utilities... HEA has been actively addressing the security of its facilities and information system over many years. Details of HEA’s efforts in this area will not be made public for security reasons. A working group of Railbelt utility Managers of Information Technology has been formed to discuss and coordinate cybersecurity efforts.”
- **July 8, 2016 - *Golden Valley Electric Association Inc.'s Response to Order No.I-16-002(1)*:** GVEA reported that the “Intertie Management Committee<sup>2</sup> (IMC) has been working on a coordinated approach towards mandatory, enforceable operating and reliability standards through the Intertie Operating Committee (IOC),” and that representatives of “the IOC and HEA have been meeting on this specific issue and have developed a compromise solution for the Railbelt,” and that the “Commission should follow and support the efforts of the IMC and the individual utilities in these matters,” and finally that the “amount of materials and information exchanged between the Commission and the utilities should be minimal and substance of filings general. Commission requests for descriptions of individual utility programs and efforts should not require the specifics of any utility's actions. Instead, the Commission should gather its

specific data from on-site visits to its jurisdictional utilities where an individualized review of related procedures and activities could be performed with more specificity.”

- **July 8, 2016 - *Comments of Municipal Light and Power in Response to Order No. I-16-002(1)*:** The Municipality of Anchorage d/b/a Municipal Light and Power (“ML&P”) states that it “believes that all Railbelt Utilities, and certain entities that are interconnected or would like to become interconnected with the Railbelt, should have security policies in place that adequately addresses physical and cyber security and review those policies on regular intervals to ensure that they remain adequate...ML&P has security policies in place to improve the security and resilience of critical infrastructure, but is reluctant to provide a copy of them to the Commission until it can be assured that the information will be kept confidential” ML&P provided further suggestions on steps that the RCA could take to ensure confidential treatment of certain utility infrastructure data.
- **July 13, 2016 – RCA Public Meeting:** Responding to the filings of July 8, 2016, commissioners noted that the “challenge with voluntary standards is you can voluntarily chose to comply with the standards, or if you don't think it is appropriate, you can voluntarily chose to not comply with the standards.” The Commission asked the utilities who was supposed to enforce their “voluntary standards.” The Commission requested the utilities to come up with a “better approach,” which it anticipated would be discussed in filings due August 10<sup>th</sup> and participation at an August Special Public Meeting.
- **August 17, 2016 – RCA Special Public Meeting:** The Commission again addressed concerns regarding “voluntary standards,” and the need for the utilities to reconcile the two different transmission standards.
- **October 11, 2017 – RCA Public Meeting:** Chugach Electric Association, Inc., Golden Valley Electric Association, Inc., and Matanuska Electric Association, Inc., Anchorage Municipal Light and Power presented a histories of the and how the two sets of present day reliability standards evolved and how the Intertie Management Committee is organized. The utilities also reported on system testing that had recently taken place. The utilities restated that efforts to reconcile two sets of standards were being undertaken.
- **November 1, 2017 -** the Alaska Railbelt Cooperative Transmission and Electric Company, Inc. (ARCTEC) issued a Request for Proposal (RFP) seeking an entity to provide facilitation services to aid in the development of a Railbelt Reliability Council (RRC). The RFP indicated the RRC would have authority to (1) assume responsibility for regional electric grid reliability (i.e., adoption, development, monitoring, and enforcement of reliability standards), (2) provide regional integrated resource planning,

and (3) assume responsibility for ensuring nondiscriminatory open-access to the regional grid through regional grid interconnection protocols. The selected entity would facilitate the development of a well-defined RRC structure in terms of governance, scope of authority, and function. The RFP also indicated that the RRC could eventually fulfill the role of an Independent (Unified) System Operator for the Railbelt.

- **January 3, 2018** - Commission Staff met with representatives of ARCTEC and GDS Associates, Inc. (GDS), the entity retained to fulfill the objectives of the RFP. The representatives presented the qualifications of GDS and requested the participation of this agency in two technical conferences that will be discussed in more detail below.
- **January 16, 2018- Order I -16-002(2) Order Scheduling Technical Conferences:** We schedule a technical conference on Friday, January 26, 2018, to allow GDS to discuss best industry practices and receive input on its straw man proposal, which was discussed at the January 3 meeting with Commission Staff. We schedule a second technical conference on Friday, March 16, 2018, to review and discuss GDS' proposed regulatory compact with regard to the RRC.
- **February 16, 2018- Order I -16-002(3) Order Providing Additional Guidance and Requiring Filings:** The RCA clarified that "While we appreciate the cooperative efforts among Railbelt electric service providers to consider a regional planning entity, we can not delay adoption of mandatory and enforceable reliability and security standards until after creation of an RRC. While GDS proposes an aggressive schedule culminating with a final report recommending the RRC structure on May 1, 2018, finalization of an RRC organization will take several months and could stretch out over a year. This entity will by definition be a public utility<sup>16</sup> subject to certification requirements. Once established, the RRC will need time to organize operations and prepare an approvable tariff before pursuing certification. Since even an unopposed certification application can take up to 6 months to process, it will likely be several months before the RRC is in a position to vet and seek approval of mandatory and enforceable reliability and security standards. We find the proposed timeframe for adoption of reliability and security standards untenable given our pressing concerns with Railbelt grid system reliability and security. We believe mandatory and uniformly applied reliability and security standards....we... provide a timeframe for two filing requirements discussed at the technical conference on January 26, 2018. We require the filing of an update on the facilitation process [one-on-one GDS meetings with stakeholders] by February 28, 2018...and require GDS to file a summary of comments received from stakeholders and interested parties by March 12, 2018, or four days in advance of the scheduled technical conference on March 16, 2018, where GDS proposes to present a MOU for RCA consideration."

- February 27, 2018 – Arctec’s Request for Modification of Procedural Schedule:** Arctec requested a one week modification [extension] of the schedule set in Order I-16-002(3).
- March 7, 2018 – GDS Associates, Inc. (GDS) Update on the Facilitation Process Employed to Obtain Stakeholder Input on the Development of a Railbelt Reliability Council:** GDS reported regarding various meeting sessions occurring between November 28, 2017 and March 5, 2018. Additionally, GDS set forth the topics presented at the meetings with the railbelt utilities: “1. Entity’s current role or relationship with the Railbelt Utilities; 2. Input on the Railbelt Reliability Council’s scope, functions, membership and qualifications; governance and board composition, committee structure and role of the RCA; 3. Input on Reliability Standards development, adoption, and enforcement; 4. Input on Open Access Transmission Service including transmission rates and cost allocation for new transmission projects, integration of renewables, interconnection study process and costs; 5. Input on Resource Planning; 6. Role of a Unified System Operator including reliability functions and single system security-constrained economic dispatch; and 7. Other input.” GDS also laid out its next steps:”1. Reach out to Interested Parties not yet interviewed to attempt to conduct their interviews; 2. Follow up as necessary with Participants and Interested Parties already interviewed; 3. Prepare a summary of comments received during the interview process with Participants and Interested Parties and provide the summary to ARCTEC to provide to the RCA by March 20, 2018; 4. Conduct a Stakeholder Workshop inviting all Participants and Interested Parties on March 13, 2018 from 9:00 a.m. to 11:00 a.m. at the CIRI Fireweed Conference Center; 5. Update and redraft GDS' presentation given at the RCA's Technical Conference that was held on January 26, 2018 for presentation at the next scheduled technical conference on March 16, 2018; 6. Continue ongoing interactions with the ARCTEC Board as necessary; and 7. Draft the MOU/Regulatory Compact and work with Participants and Interested Parties to reach agreement.”
- March 20 and 21, 2018 - GDS Associates, Inc. Summary of Comments From Stakeholders and Interested Parties During Interviews and Workshops; and Supplemental Summary of Comments From Stakeholders and Interested Parties During Interviews and Workshops:** GDS filed approximately summaries of Railbelt utility and other parties. Approximately 20 pages of double spaced general summaries of comments made to GDS.
- April 2, 2018 – Comments re Electric Reliability Standards:** Pursuant to the October 11, 2017 MOU between the six Railbelt Electric Utilities and AEA (as a member of the Intertie Management Committee), we are submitting this progress report related to our efforts to reach consensus on reliability standards for adoption and enforcement by a

Railbelt-wide reliability organization. Technical representatives of AEA, Chugach, GVEA, HEA, MEA, and ML&P met on March 30th for a final technical review of the consensus standards.... These standards are currently undergoing final clerical editing and will be adopted by all six interconnected Railbelt utilities and submitted to the RCA on April 15, 2018. The standards we have agreed to will be living documents and will require revision and refinement as operating conditions change and implementation experience is gained. The utilities will continue to work collaboratively to ensure reliable operations and common system standards. With respect to cyber and physical security, a standards drafting effort is under way. An RFP is under development by the Railbelt Cyber Security Working Group to retain consulting assistance in drafting these standards. We expect to bring this body of work to the RCA within 12 months.

- **April 17, 2018 – *Thibert Letter, Exhibit A; [Proposed] Reliability Standards*:** Chugach Electric Association, Inc., on behalf of AEA, Golden Valley Electric Association, Inc., Homer Electric Association, Inc., Matanuska Electric Association, Inc., Anchorage Municipal Light and Power, and Seward Electric System submits the Railbelt’s updated consensus reliability standards, attached as Exhibit A. There were ten proposed reliability standards.
- **May 15, 2018 - Order I-15-001(7)/I-16-002(5) Order Inviting Presentations:** “To ensure that timely progress on these issues will occur, we include the following topics on the agenda for our next three scheduled public meetings as follows... June 27, 2018 – (Docket I-16-002) A status report on voluntary adoption of mandatory electric utility reliability standards, including standards addressing financial obligations, cyber security, and enforcement mechanisms, and the need for adoption of electric utility reliability standards as regulations.”
- **May 15, 2018 - *Request for Modification of Procedural Schedule*:** This request is being made on behalf of Chugach Electric Association, Inc., Golden Valley Electric Association, Inc., Matanuska Electric Association, Inc., the City of Seward, d/b/a Seward Electric System, Homer Electric Association, Inc., and Anchorage Municipal Light and Power (hereinafter the "Six Railbelt Utilities").” The parties state that: “most of the essential work on the reliability standards has been completed and the Six Railbelt Utilities are largely in agreement on the "way forward" to adopt, implement and enforce those standards. We believe that a good and reasonably informative presentation to the Commission can be made on May 23” [rather than June 27]. In essence, the parties requested that the subject matter presentations as set forth be shuffled.
- **May 16, 2018 - *Submission of GDS & Associates Final Report and Recommendations for the Development of the Railbelt Reliability Council*:** On behalf of Alaska Railbelt



Cooperative Transmission & Electric Company ("ARCTEC") enclosed is the GDS Associates Final Report with recommendations to implement a Railbelt Reliability Council (RRC) as a necessary and critical step toward optimization of the Railbelt electrical generation, transmission and distribution systems.. Also enclosed is an initial Draft MOU submitted by GOS to the ARCTEC utilities as part of their work product that comports with their recommendations. While the utilities likely have differing opinions on some of the GOS findings, all six of the Railbelt utilities have reviewed the GOS Draft MOU and have agreed to use the document as an initial template to negotiate in good faith a fully acceptable agreement. Recognizing that all six utilities have governance policies for approval of such agreements our goal is to submit to the Commission a completed MOU signed agreement by the utilities on/about July 3, 2018.

- **June 27, 2018 – RCA Public Meeting:** Chugach Electric Association, Inc. ("Chugach"), City of Seward, Golden Valley Electric Association, Inc. (GVEA), Homer Electric Association Inc. (HEA), Matanuska Electric Association, Inc. (MEA), and the Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P") collectively the Railbelt utilities updated the Commission on progress forming a 'Railbelt Reliability Council.' ARCTEC delivered a GDS prepared presentation that demonstrated and documented the steps taken in the development and adoption processes used in drafting proposed Reliability Standards that were filed with the Commission in April of 2018, as well as forming the "Railbelt Reliability Council." The presentation included proposed enforcement of those standards. *Commissioners noted that some areas are "not fleshed out or addressed."*
- **July 11, 2018 – RCA Public Meeting:** RCA Staff presented questions arising from the proposed Reliability Standards that were filed with the Commission in April of 2018, and recommended a Technical Conference be held to discuss the proposed standards.
- **July 17, 2018 - Order I-16-002(6) Order Scheduling Technical Conference:** We schedule a technical conference for July 27, 2018, to allow industry to address the questions raised by Staff and to further explain the consensus reliability standards. The questions raised by Staff are attached to the transcripts of our public meeting held July 11, 2018.... We are particularly concerned with identifying any gaps in the consensus reliability standards and plan to address at the second conference issues such as procedures for developing/modifying/approving reliability standards, measures for addressing resiliency and system restoration should a catastrophic event impact electric service on the Railbelt grid, and enforcement mechanisms should entities fail to comply with applicable reliability standards.
- **July 27, 2018 – RCA Technical Conference:** was held.

- **July 17, 2018 - Order I-16-002(7) *Order Scheduling Technical Conference*:** We seek to identify gaps in the Consensus Reliability Standards, clarify procedures used to develop and modify reliability standards in the future, ensure adequate measures for addressing resiliency and system restoration should a catastrophic event impact electric service on the Railbelt grid, assess compliance with reliability standards both now and as they evolve, and determine appropriate enforcement mechanisms should entities fail to comply with applicable reliability standards. By this order we identify areas for discussion at our technical conference on August 8, 2018. The RCA propounded nine questions and instructed the utilities to be prepared to address and discuss the questions and responses at the technical conference.
- **August 8, 2018 – RCA Technical Conference:** was held.
- **August 15, 2018 - *Homer Electric’s Resolution Approving the Execution of a Memorandum of Understanding to Create a Railbelt Reliability Council*:** HEA informed the “Regulatory Commission of Alaska (RCA) Commissioners of the recent HEA Board of Directors approval of a resolution approving the execution of a memorandum of understanding to create a Railbelt Reliability Council.”
- **September 12, 2018- Order I-15-001(8)/I-16-002(8) *Order Inviting Final Round of Presentations before Second Response to Legislature*:** As discussed at our public meeting on May 9, 2018, there is concern on our part, by legislators, and by other interested persons whether adequate progress is being made on the timely development of an independent Railbelt transmission operator, mandatory merit based economic dispatch of Railbelt generation resources, and enforceable electric utility reliability standards... we include the following topics on the agenda for our next three scheduled public meetings as follows... October 24, 2018 – (Docket I-16-002) A status report on voluntary adoption of mandatory electric utility reliability standards, including standards addressing financial obligations, cyber security, and enforcement mechanisms, and the need for adoption of electric utility reliability standards as regulations. We invite affected, or potentially affected, electric public utilities and other interested persons to present reports or comments at these public meetings.
- **October 2, 2018 - Notice of Informal Workshop at The Regulatory Commission of Alaska:** The Regulatory Commission of Alaska (Commission) issued notice of informal workshop, October 9, 2018, in Docket 1-16-002 to discuss the Railbelt Reliability Council (RRC), an entity proposed by the Alaska Railbelt Cooperative Transmission and Electric Company, Inc. Railbelt utilities are currently discussing the proposed activities

and authority of the RRC, with a stated intent of filing a Memorandum of Understanding (MOU) with the Commission in the near future.

- **October 9, 2018 – Informal Workshop:** was held.
- **October 24, 2018 – AKPIRG Comments:** The Alaska Public Interest Research Group (AkPIRG) stated that, “It is unusual for those who fund a council or organization to have little say in how that council is established. As stated in the currently proposed RRC MOU, ‘the RRC will fund its operations through member dues and an annual system administration fee collected from users within the Railbelt.’ AkPIRG believes it is imperative to include consumer voices on any RRC implementation committee, as well as the RRC’s Board of Directors.”
- **October 24, 2018 – RCA Public Meeting:** The Renewable Energy Alaska Project or REAP, provided comments regarding the failure of the Railbelt Utilities to follow the recommendations made by GDS in establishing reliability standards in addition to other shortcomings. REAP stated that the “Commission has the right to be skeptical” and asked when “compulsory steps” would be taken. A presentation was made by the ad-hoc Railbelt Cybersecurity Working Group reporting on the steps taken by Chugach Electric, Municipal Light & Power, Matanuska Electric, Golden valley Electric, Homer Electric, City of Seward, and Doyon Utilities, in identifying the scope of issues, selecting a vendor to assist in writing cybersecurity standards, and holding workshops. The utilities also delivered a presentation which charted a way forward for forming a Railbelt Reliability Council. Additional presentations and comments were made acknowledging that RCA had jurisdiction to demand reliability, to approve or reject proposed reliability standards, to direct adherence to, and enforce reliability standards.
- **October 25, 2018 - I-15-001 In the Matter of Evaluation of the Operation and Regulation of the Alaska Railbelt Electric Transmission System:** Chugach Electric Association, Inc. provided its August 29, 2018 Board Agenda Item regarding the Railbelt Reliability Council Memorandum of Understanding (approved by the Board that same date);
- **October 25, 2018 - I-15-001 In the Matter of Evaluation of the Operation and Regulation of the Alaska Railbelt Electric Transmission System:** Golden Valley Electric Association, Inc. (GVEA) provided the following documentation: • GVEA Board of Directors Resolution No. 110-18, Approving the Execution of a Memorandum of Understanding (MOU) to Create a Railbelt Reliability Council and the Filing of a TRANSCO Certificate of Public Convenience and Necessity dated September 24, 2018;

A copy of the Railbelt Reliability Council MOU signature page containing the signature of Cory R. Borgeson, President and Chief Executive Officer of GVEA.

- **November 6, 2018 - *Order I-15-001(9)/I-16-002(9) Order Requiring Filings:*** At our public meeting held October 24, 2018, we requested that each Railbelt electric utility file copies of the resolution(s) by each entity's governing board authorizing formation of both the RRC and the regional transmission company... By this order we require the remaining Railbelt electric utilities (MEA, ML&P, and Seward) to file within three days a copy of the resolution(s) by each entity's governing board authorizing formation of both the RRC and the regional transmission company.
- **November 9, 2018 – *Municipal Light and Power's Response to Order No. I-15-001(9)/I-16-002(9):*** As ML&P's General Manager Mark Johnston explained during the September 26, 2018, public meeting regarding Docket I-15-001, ML&P does not have a governing board that would need to pass a resolution regarding the creation of a Railbelt Reliability Council ("RRC")... Accordingly, no such resolutions exist. However, the ML&P Advisory Commission and the Municipality of Anchorage Administration are aware, and fully supportive, of ML&P's continuing efforts related to the RRC.
- **November 9, 2018 – *City of Seward's Response to Order No. I-15-001(9)/I-16-002(9):*** The City of Seward, Seward Electric Utilities Division ("Seward") submitted an "unsigned version of Resolution 2018-082 by the City Council of the City of Seward, Alaska ("Seward City Council"). That resolution was passed and approved on October 1, 2018, and authorizes Seward to enter into a memorandum of understanding for the creation of the Railbelt Reliability Council. Seward will submit a signed version of the resolution to the Commission when it becomes available.
- **November 9, 2018 - *I-16-002 In the Matter of the Evaluation of the Reliability and Security Standards and Practices of Alaska Electric Utilities, Order No. 9:*** In response to the Commission's request, Matanuska Electric Association, Inc. (MEA) provides the following.. Motion on the Railbelt Reliability Council Memorandum of Understanding passed by MEA's Board of Directors on September 17, 2018... Consistent with direction from the MEA Board of Directors, MEA has signed the Memorandum of Understanding to form a stakeholder driven RRC with responsibility for Railbelt reliability standards, interconnection protocols, system planning, and a review of the benefits and costs of system-wide economic dispatch. We believe this foundational organization will resolve many of the concerns raised in the Commission's letter to the legislature in June 2015.
- **January 23, 2019 – *RCA Public Meeting:*** RCA staff provided a status update regarding the drafting of a reliability standards manual.

- February 27, 2019 – RCA Public Meeting:** In addition to presentations by Chugach Electric Association, Inc. ("Chugach"), Golden Valley Electric Association, Inc. (GVEA), Matanuska Electric Association, Inc. (MEA), and the Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P") regarding lessons learned from outages resulting from the November 30, 2018 earthquake (and continuing seismic activity), ML&P also made a presentation in response to the RCA'S request to talk about the service outage that occurred on January 29th, 2019, where plant 23 2A tripped.
- March 13, 2019 – RCA Public Meeting:** Commissioners discussed what might be included in the Commission's upcoming progress report to the Legislature. Regarding Reliability Standards, a lengthy discussion took place regarding progress made: the development of standards, the efforts in envisioning and structuring a framework for a reliability organization. Commissioners went on to discuss that while Commission absolutely holds authority and jurisdiction regarding reliability, it was explained how proposed legislation would allow for the creation and framework of an ERO and how that entity would function in assuring reliability. TR 24- 30.
- April 10, 2019 - RCA Public Meeting:** Chairman Pickett reported on the status of the Commission's planned follow-up response to the Legislature regarding the steps taken to implement the RCA's recommendations made to the Legislature in 2015. He stated that "Finding 4 dealt with the reliability standards being voluntary, and at that point in time, not all of the utilities have adopted the same standards, and our recommendation was for enforceable consistent Railbelt operating and reliability standards, and I think that this is probably the one finding and recommendation that we can actually demonstrate more solid progress on it, largely through the efforts of trying to create an RRC; though, there's obviously, just gauging from the comments on proposed statutory language, there's still a lot of areas that need to be clarified, and there's not an agreement, and I'm not going to even get to where the Commission is at, but just among the various impacted parties with these proposed approaches."
- April 24, 2019 - RCA Public Meeting:** Chairman Pickett reported on the status of the Commission's planned follow-up response to the Legislature regarding the steps taken to implement the RCA's recommendations made to the Legislature in 2015. The status update described the format of the planned report and discussed the substance of the report. The meeting concluded prior to the conclusion of Chairman's discussion.
- May 3, 2019 - RCA Public Meeting:** Chairman Pickett resumed his discussion regarding the proposed follow-up response to the Legislature regarding the steps taken to implement the RCA's recommendations made to the Legislature in 2015.

**May 8, 2019 - RCA Public Meeting:** Chairman Pickett reported on changes and streamlining of the proposed follow-up response to the Legislature regarding the steps taken to implement the RCA's recommendations made to the Legislature in 2015

- **July 10, 2019 - *Cyber and Physical Security Standards, Docket No. 1-16-002*:** Chugach Electric Association, Inc. ("Chugach"), City of Seward, Golden Valley Electric Association, Inc. (GVEA), Homer Electric Association Inc. (HEA), Matanuska Electric Association, Inc. (MEA), and the Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P") collectively the Railbelt utilities provided a status report regarding the joint effort to collaboratively promulgate meaningful cyber and physical security standards in Docket No. 1-16- 002. "As stated in the Electric Reliability Standards letter to the Commission filed on April 2, 2018, the Railbelt Electric Utilities, through the Railbelt Cybersecurity Working Group (RCWG), executed an RFP to assist in the development and drafting of cyber and physical security standards (AKCIP-014-1 - Physical Security, developed by the Intertie Operating Committee (IOC)). The utilities recognize the significant role these standards play in achieving optimal reliability and protection of critical Railbelt utility infrastructure...The following is a list of standards and supporting documents developed by the six Railbelt utilities (AKCIP Standards reference NERC CIP numbering and title. NERC CIP-001 is no longer an active standard, and CIP-012 and CIP-013 are presently under development by NERC): 1. AKBES Glossary - One glossary for both Reliability and Cybersecurity Standards 2. Preface to AKCIP Standards 3. AKCIP Addendum - Guidance for Virtualization of BES Cyber Assets 4. Cyber Asset Inventory Procedure 5. Exception Process 6. AKCIP Cyber Asset Capability Exception (CACE) Form 7. AKCIP BES Definition Reference (under development). 8. AKCIP-002-1 - AKBES Cyber System Categorization 9. AKCIP-003-1 - Security Management Controls 10. AKCIP-004-1 - Personnel & Training II. AKCIP-005-1 - Electronic Security Perimeter(s) 12. AKCIP-006-1 - Physical Security of AKBES Cyber Systems 13. AKCIP-007-1 - System Security Management 14. AKCIP-008-1- Incident Reporting and Response Planning 15. AKCIP-009-1 - Recovery Plans for AKBES Cyber Systems 16. AKCIP-010-1 - Configuration Change Management and Vulnerability 17. AKCIP-011-1 - Information Protection 18. AKCIP-014-1 - Physical Security (Developed by the IOC). The utilities consider the content of these standards to be confidential. Should the Regulatory Commission of Alaska desire to review the standards in detail, we request you develop a process that ensures that we are able to maintain this confidentiality."
- **July 12, 2019 – RCA Public Meeting:** RCA staff provided a status update regarding the progress made of creating a reliability standards manual.

- November 13, 2019 – RCA Public Meeting:** The Alaska Energy Authority (AEA), Chugach Electric Association, Inc. ("Chugach"), City of Seward, Golden Valley Electric Association, Inc. (GVEA), Homer Electric Association Inc. (HEA), Matanuska Electric Association, Inc. (MEA), and the Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P") collectively the Railbelt utilities presented an update regarding efforts to finalize the draft Memorandum of Understanding which was originally filed with the Commission in April of 2018. The presentation also included updates on the efforts to form the Railbelt Reliability Council.
- December 11, 2019 – RCA Public Meeting:** Discussions regarding SB123 and the creation of an Alaska Electric Reliability Organization were held. In addition, RCA Staff presented a report regarding NERC's 2019 Gridex exercise. Gridex is an exercise designed to allow electric utilities and regulators learn about potential electric grid disruptions and how to minimize occurrences and disruptions to critical infrastructure based on past scenarios.
- December 20, 2019 - Informational filing (1-15-001 & 1-16-002): Railbelt Reliability Council Memorandum of Understanding:** Chugach Electric Association, Inc. ("Chugach"), City of Seward, Golden Valley Electric Association, Inc. (GVEA), Homer Electric Association Inc. (HEA), Matanuska Electric Association, Inc. (MEA), and the Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P") collectively the Railbelt utilities filed with the Commission, a final version of their Memorandum of Understanding regarding the formation of a Railbelt Reliability Council. This version is signed by the six Railbelt Utilities.
- January 8, 2020 – RCA Public Meeting:** Matanuska Electric Association, Inc. updated the Commission regarding the implementation status of the envisioned Railbelt Reliability Council, as set forth in the Filing made by Chugach Electric Association, Inc. ("Chugach"), City of Seward, Golden Valley Electric Association, Inc. (GVEA), Homer Electric Association Inc. (HEA), Matanuska Electric Association, Inc. (MEA), and the Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P") collectively the Railbelt utilities on December 20, 2019. In addition to that a presentation was made HKS Strategies which set forth the manner in which the Electric Reliability Council of Texas, was formed and the manner in which it operates.