

December 8, 2025

Lauren.perotti@nerc.net

Lauren Perotti
Senior Counsel
North American Electric Reliability Corporation
1401 H Street, N.W. Suite 410
Washington, DC 20005

Dear Ms. Perotti:

M12436 - North American Electric Reliability Corporation (NERC) - Second Quarter 2025 - Application for Approval of Reliability Standards

The Board reviewed the following filing from the North American Electric Reliability Corporation (NERC), dated August 22, 2025:

- Application for Approval of Reliability Standards-Second Quarter 2025

The Board understands that NERC is requesting approval of the following revised Reliability Standards:

- CIP-015-1

There was no request for approval of any changes or additions to any definitions in the NERC Glossary.

The Board requested comments from Nova Scotia Power Incorporated (NS Power) and the Nova Scotia Independent Electricity System Operator (NSEISO), which were received on October 21, 2025, and October 16, 2025, respectively. NSIESO noted that it had reviewed the application and would not be providing comments.

CIP-015-1 is about cyber security and its purpose is to "...improve the probability of detecting anomalous or unauthorized network activity in order to facilitate improved response and recovery from an attack." It involves implementing internal network security monitoring systems and processes. NS Power indicated that implementation of these standards "... will require capital project support as there is significant work to meet compliance ...". NS Power said that a capital "... project will be submitted to the NSEB when appropriate and may include other NERC standards that require project support to be implemented". Implementation aspects of CIP-15-01 include traffic monitoring, network feed setup, integration with monitoring tools, documentation, and processes. NS Power recommended that the revised reliability standards be approved and recommended the date for them to be made effective in Nova Scotia.

Section 67(2) of the *More Access to Energy Act* came into effect on April 1, 2025. The provision stipulates that, prior to approval of reliability standards, the Board must consider

their potential impact on the reliability of the bulk system, potential costs and benefits of approval and public interest considerations. The information supplied in the NERC application addresses most of the issues. The Board requested more information on implementation costs. On December 1, 2025, NS Power confirmed which reliability standards would have material implementation costs. The utility provided a high-level combined capital cost estimate of approximately \$4.5 million to implement BAL-007-1, TOP-003-7, TPL-008-1, PRC-030-1 (a prior filing), and CIP-015-1. Also, internal resources will be needed to implement the reliability standard.

A recent event involving a cyber-attack on NS Power business systems highlights the importance of cyber security. The Board is satisfied that NERC's detailed description of the purpose for the CIP-015-1 reliability standard, why this standard was adopted, and the extensive process leading to its adoption, confirms that the reliability standard is important to maintain the reliability of the bulk transmission system. It is in the public interest that every reasonable effort be made to safeguard the bulk transmission system from cyber-attacks to ensure its reliability and that such efforts be made in coordination with the other entities in the Northeastern Power Coordinating Council region. Estimated costs appear reasonable to achieve this goal.

NS Power stated that NERC Reliability Standards and Northeast Power Coordinating Council Regional Reliability Criteria only become enforceable in Nova Scotia once approved by the Nova Scotia Energy Board (Board). While NERC's applications typically include a table listing of the effective dates of each applicable Reliability Standard in the United States, NS Power, based on prior discussions with NERC counsel, has requested that, for clarity, the Board explicitly confirm the effective date in Nova Scotia within its Order when reviewing NERC's quarterly applications.

Accordingly, the Board accepts NS Power's recommendations, about the effective date and they are incorporated in Appendix "A". As with past submissions, Board approval of the Reliability Standards does not extend to approval of associated Violation Risk Factors and Violation Severity Levels.

Further, the NERC implementation plan noted that there is a phased approach in implementation of the CIP-015-1. This phased-in implementation allows for the prioritization of high impact BES Cyber Systems, Control Centers, and backup Control Centers, which pose the greatest risk to reliability and this approach also balances the limited resources, such as available vendors and the added complexity posed by bringing medium impact BES Cyber Systems with External Routable Connectivity into compliance.

The Board understands that the effective dates set by NERC and the subsequent effective dates for NS Power are the dates on which the standard is fully enforceable. Notwithstanding the dates approved for enforcement noted in Appendix 'A', the Board strongly encourages NS Power to implement requirements of CIP-015-1 as soon as possible.

Yours very truly,



Richard J. Melanson, LL.B.
Member



- c. Charles Dickerson, NPCC
Blake Williams, NS Power

APPENDIX "A"

LIST OF STANDARDS APPROVED

Reliability Standard	Description	NERC Effective Date (m/d/y)	Nova Scotia Effective Date (m/d//y)
Critical Infrastructure Protection (CIP)			
CIP-015-1*	Cyber Security – Internal Network Security Monitoring	10/01/2028	Date for all High and Medium Impact Control Centers with External Routable Connectivity (ERC) must be compliant with effective date of standard: ○ Effective January 1, 2029 Date for all other Medium Impact BES Cyber Systems with External Routable Connectivity (ERC) must be compliant (24 months after effective date of standard). ○ Effective January 1, 2031

*Standards not yet effective (NERC effective date) at the time of filing with the Board but had been approved by FERC with the future mandatory effective date indicated.

