
Nova Scotia Energy Board

**North American Electric Reliability
Corporation**

M12436

**2025 Q2 Application for Approval of
Reliability Standards**

NS Power Recommendations

October 20, 2025

NON-CONFIDENTIAL

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1.0 INTRODUCTION

In its application dated August 22, 2025, the North American Electric Reliability Corporation (NERC) applied to the Nova Scotia Energy Board (NSEB, Board) for approval of the following new NERC Reliability Standard approved by the United States Federal Energy Regulatory Commission (FERC) during the second quarter of 2025:

1. Reliability Standard CIP-015-1

NERC did not apply to the NSEB for approval of any changes or additions to any definitions in the NERC Glossary.

NERC's application states as follows:

As provided in the table below, during the second quarter of 2025, FERC issued an order approving CIP-015-1 (Cyber Security – Internal Network Security Monitoring). No other Reliability Standards applicable to Nova Scotia were approved by FERC during the second quarter of 2025.

Revised Reliability Standards

Reliability Standard	Effective Date
Critical Infrastructure Protection (CIP)	
CIP-015-1*	10/1/2028

* At the time of this filing, the standards marked with an asterisk are not yet effective, but have been approved by FERC and have a future mandatory effective date.

By letter dated September 4, 2025, the NSEB requested comments from Nova Scotia Power Incorporated (NS Power, Company) on NERC's Application by October 20, 2025.

NS Power provides comments and recommendations on this matter in the sections below.

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1.1 Effective Dates

On June 30, 2010, NERC submitted its first set of Reliability Standards to the Nova Scotia Utility and Review Board (NSUARB) for approval. The NSUARB issued a Decision and Order approving these standards on July 20, 2011. In its Decision, the NSUARB also approved a quarterly review process.¹ On April 1, 2025, on proclamation of the *Energy and Regulatory Boards Act*, S.N.S. 2024, c. 2, Sch. A, the Utility and Review Board was succeeded by the Nova Scotia Energy Board (NSEB, Board) for all applications related to electric utilities.

NS Power notes that in each case where NERC recommends approval of a Reliability Standard, it has recommended an effective date in Nova Scotia. NERC Reliability Standards and NPCC Regional Reliability Criteria only become mandatory in Nova Scotia upon approval by the NSEB. However, NERC's Applications usually contain a table showing the NERC effective dates in the United States for each of the applicable Reliability Standards (such as the table from NERC's Q1 2025 application reproduced above). Following prior discussions with NERC counsel, NS Power indicated that for clarification purposes, when commenting on NERC's quarterly applications, the Company requests that the NSEB confirm in its Order the effective date in Nova Scotia in each case.

1.2 VRFs and VSLs

When NS Power recommends approval of NERC Reliability Standards to the NSEB, its recommendation does not include NERC Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs). Consistent with the NSUARB's Decision dated July 24, 2013, with respect to NERC's Q1 2013 Application, NERC has confirmed that it does not seek approval of the VRFs and VSLs associated with the Reliability Standards submitted in its Application.

¹ M03324, NERC-R-10, NSUARB Order, July 20, 2011.

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1 NS Power confirms its understanding that the NSEB's approval of these Reliability Standards will
2 exclude approval of any VRFs and VSLs. If this understanding is incorrect, NS Power asks that
3 this be clarified by the NSEB and that NS Power be provided with an opportunity for further
4 comment.

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6 **1.3 Independent Energy System Operator of Nova Scotia (IESO-NS)**

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8 Some of NS Power's NERC Registered roles will be transitioning to the Independent Energy
9 System Operator of Nova Scotia (IESO-NS). Accordingly, implementation of and compliance with
10 applicable NERC reliability standards related to those roles and adopted in Nova Scotia will
11 become the responsibility of IESO-NS as those registered roles are transferred.

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2.0 NS POWER RECOMMENDATION

NS Power has reviewed NERC's Application and provides the following recommendations.

2.1 CIP-015-1

Reliability Standard	CIP-015-1 (Cyber Security – Internal Network Security Monitoring)
Group	Critical Infrastructure Protection (CIP)
Current version in Effect in Nova Scotia	New Standard, no version in effect in Nova Scotia.
Applicability	This standard is applicable in Nova Scotia because NS Power currently performs the following functions, to which this Reliability Standard is applicable, as listed in Section 4 of the Standard: • Balancing Authority • Distribution Provider (as listed in the standard) • Generation Operator • Generator Owner • Transmission Operator • Transmission Owner
FERC Approval Date: (mm/dd/yy)	<i>Order No. 907, 191 FERC ¶ 61,224 (2025)</i>
NERC Effective Date: (mm/dd/yy)	10/01/2028
Implementation Plan	Implementation Plan
Method of Calculating the Nova Scotia Effective Date	Where approval by an applicable governmental authority is required, the standard shall become effective on the first day of the first calendar quarter that is thirty-six (36) months after the effective date of the applicable governmental authority's order approving the standard, or as otherwise provided for by the applicable governmental authority.

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NS Power Recommendation	NS Power recommends CIP-015-1 be approved. If NSEB approval is received in the fourth quarter of 2025, NS Power recommends this standard be effective January 1, 2029. NS Power notes that there is a phased-in approach to parts of the standard. Effective 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 Effective 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 If approval is received later, the effective date should be recalculated by applying the implementation plan referenced above.
Retirement requested	Not Applicable

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1 **3.0 GLOSSARY DEFINITIONS**

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3 NERC did not request approval of any new or revised associated definitions in their Second
4 Quarter 2025 Application.

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1 **4.0 RETIREMENT OF RELIABILITY STANDARDS**

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3 There are no versions of previous standards required to be retired as part of this application.

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5.0 CONCLUSION

In summary, NS Power has reviewed the NERC Application and recommends the NSEB approve Reliability Standard CIP-015-1 effective as set out in Section 2.0.

NS Power notes that CIP-015-1 will require capital project support as there is significant work to meet compliance such as, but not limited to, implementation aspects such as traffic mirroring, network feed setup, integration with monitoring tools, documentation, and processes. A project will be submitted to the NSEB when appropriate and may include other NERC standards that require project support to be implemented.