



**Québec Reliability Standards Compliance Monitoring and Enforcement Program
Implementation Plan**

2024 Annual Implementation Plan

Effective Date: January 1, 2024

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I. Introduction

The Québec Reliability Standards Compliance Monitoring and Enforcement Program Implementation Plan (Implementation Plan) is the annual operating plan conducted by the Northeast Power Coordinating Council, Inc. (NPCC), while performing its responsibilities and duties as described in the *Québec Reliability Standards Compliance Monitoring and Enforcement Program (QCMEP)*.¹ NPCC conducts QCMEP activities in accordance with the *Amended and Restated Agreement on the Implementation of the Québec Reliability Standards Compliance Monitoring and Enforcement Program (QCMEP Agreement)*.²

The Electric Reliability Organization (ERO) Enterprise (ERO Enterprise) consists of the North American Electric Reliability Corporation (NERC), NPCC, and other Regional Entities. The ERO Enterprise developed one ERO Compliance Monitoring and Enforcement Program Implementation Plan (ERO Enterprise IP).³ NPCC developed the Québec Implementation Plan using the same approach and concepts that are used during the development of the ERO Enterprise IP. This Implementation Plan represents NPCC's high-level priorities for the 2024 QCMEP and NPCC will adapt monitoring activities for each registered entity based on its unique characteristics. At all times, registered entities remain responsible for compliance with all requirements applicable to their registered functions.

During the implementation year, NPCC, with approval from the Régie, may update the Québec Implementation Plan. Updates could be needed to reflect changes to compliance monitoring processes, major events, Régie orders, or other developments. Any updates to the Québec Implementation Plan will be communicated to registered entities and NERC, if applicable.

II. Overview of Framework

The ERO Enterprise uses the Risk-based Compliance Oversight Framework (Framework) to identify ERO Enterprise-wide risks to reliability and subsequent mitigating factors that may reduce or eliminate a specific risk to interconnection and/or continent-wide risks to reliability. To accomplish this, the ERO Enterprise identifies risk elements using data including, but not limited to: compliance findings; event analysis experience; data analysis; the professional judgment of ERO Enterprise staff, committees, and subcommittees (e.g., NERC Reliability Issues Steering Committee (RISC)); by reviewing

¹ [Québec Reliability Standards Compliance Monitoring and Enforcement Program \(QCMEP\)](#), effective September 15, 2022

² [Amended and Restated Agreement on the Implementation of the Québec Reliability Standards Compliance Monitoring and Enforcement Program](#), effective September 15, 2022

³ [2024 ERO Enterprise Compliance Monitoring and Enforcement Program Implementation Plan, Version 1.0](#) (October 2023)



publications including the RISC report,⁴ the State of Reliability Report,⁵ the Long-Term Reliability Assessment,⁶ and publications from the RISC, special assessments, the ERO Enterprise Strategic Plan, and ERO Event Analysis Process insights. The risks identified by the ERO Enterprise are used by NPCC to develop the list of actively monitored Reliability Standards and requirements and to focus compliance monitoring and enforcement activities in Québec.

The ERO Enterprise reviewed and reassessed the 2023 risk elements to determine applicability for 2024. The ERO Enterprise risk elements are shown in Table 1. NPCC also considered Québec risks, specific circumstances, and operational characteristics associated with registered entities in Québec for 2024. NPCC identified one additional risk element that is specific for the Québec Region in Table 2.

NPCC uses the Framework and other risk-based processes, including Inherent Risk Assessments (IRAs), to develop an informed list of NERC Reliability Standards and Requirements for Québec that are intended to reflect NPCC's prioritization within the QCMEP and to communicate to Québec registered entities to bring focus within their operations to address each prioritized risk.

A. Inherent Risk Assessment

NPCC will continue to perform an IRA of registered entities to categorize the potential risks posed to the reliability of the electric power transmission system. An IRA is performed by NPCC for all registered entities that have been considered for an audit in the annual implementation plan. The IRA's objective is to identify areas of focus and is used as an input to determine the registered entity's final compliance monitoring scope and oversight plan. An IRA considers entity-specific risk factors such as assets, systems, geography, interconnectivity, prior compliance history, and overall unique entity composition. These risk factors are evaluated against the violation risk factors included in the Reliability Standard, and categorized as high, medium, and low. The risk factors ratings are then used to map to a proposed scope for monitoring purposes. To the extent possible, NPCC will use available information to conduct the IRA without requiring pre-audit information from the registered entity.

B. Compliance Monitoring Tools

The Québec Implementation Plan documents the planned compliance monitoring tools (e.g., off-site or on-site audits, spot checks, or guided self-certifications). Entities registered as a Reliability Coordinator, a Balancing Authority, or a Transmission Operator will remain on an audit cycle of at least every three (3) years. The remaining registered entity functions are on an audit cycle of at least every six (6) years. The determination of

⁴ [2023 ERO Reliability Risk Priorities Report](#)

⁵ [2023 State of Reliability - Bulk Power System Performance](#)

⁶ [2022 Long-Term Reliability Assessment, December 2022](#)



the appropriate compliance monitoring tools is adjusted, as needed, within a given implementation year.

C. Enforcement of Reliability Standards

The QCMEP permits risk-based enforcement of Reliability Standards. If after NPCC’s evaluation, a non-compliance involves only a low-level risk for the reliability of electric power transmission and the registered entity takes steps to correct the non-compliance, NPCC may recommend the non-compliance be processed using the simplified identification, correction, and monitoring procedure. Under the simplified procedure, if the situation is corrected to the Régie’s satisfaction, no financial penalty or sanction is imposed on the registered entity. This process encourages prompt identification and correction of non-compliance by registered entities.

Penalties and sanctions are warranted for some moderate risk violations and most, if not all, serious or substantial risk violations. Penalty or sanction credits are typically offered when the registered entity offers valued behavior such as cooperation, accountability (affirmatively accepting responsibility for non-compliance), a culture of compliance, and self-identification of non-compliance.

III. Content of Annual Implementation Plan

A. Risk Elements

Table 1 shows the 2024 ERO Risk Elements and the 2023 ERO Risk Elements. The risk element development process considers data, reports, and publications to identify risks which translate into compliance monitoring.

Table 1: Comparison of ERO Risk Elements	
2023 Risk Elements	2024 Risk Elements
Remote Connectivity	Remote Connectivity
Supply Chain	Supply Chain
Not Applicable	Physical Security
Incident Response	Incident Response
Stability Studies	Stability Studies
Inverter-Based Resources	Inverter-Based Resources
Facility Ratings	Facility Ratings
Cold Weather Response	Extreme Weather Response



In addition to the Risk Elements identified by the ERO Enterprise, Gaps in Program Execution remains as a unique Risk Element applicable in Québec in 2024. Additional NERC Reliability Standard requirements under this Québec Regional Risk Element are identified in the Québec actively monitored list in Table 3.

Table 2: Regional Risk Element for Québec	
Regional Risk Element for Québec	Justification
Gaps in Program Execution	The entity needs not only to show compliance, but internal controls need to be in place, working, and effective. This is particularly relevant to critical infrastructure identification and protections, communications, modeling, training, and maintenance. Trends in gaps that NPCC has observed in recent compliance monitoring engagements and/or other ERO identified risks appear as requirements in Table 3 under “Gaps in Program Execution”.

B. Reliability Standards Effective

The Régie adopts and makes effective NERC Reliability Standards and their Québec appendices (the Reliability Standards). The Reliability Standards effective in Québec and those to become effective in Québec are identified on the [Reliability Standards](#) webpage of the Régie’s website.

C. Québec Areas of Focus – Table of Actively Monitored Standards

Table 3 shows the list of Reliability Standards and requirements that will be actively monitored by NPCC in Québec for 2024.

To develop Table 3, NPCC uses the 2024 ERO Enterprise Areas of Focus as a baseline and then compares those to the NPCC Areas of Focus while taking into account which Standards and requirements are effective in Québec and considering which Québec entities are scheduled for audit in 2024. Finally, NPCC may decide to add Areas of Focus for Québec entities to Table 3 that are associated with an ERO 2024 Risk Element, while the Reliability Standard and requirement do not necessarily correspond to an ERO 2024 Risk Element.

Table 3: Actively Monitored Standards and Requirements for 2024				
Area of Focus Identification	Risk Element	Standard	Requirement(s)	Monitored Function(s)
Québec Specific	Gaps in Program Execution	CIP-002-5.1a	R1, R2	GOP, GO, TO
Québec Specific	Gaps in Program Execution	CIP-003-8	R1, R2	GOP, GO, TO
Québec Specific	Gaps in Program Execution	CIP-004-6	R4, R5	GOP, GO, TO



Table 3: Actively Monitored Standards and Requirements for 2024

Area of Focus Identification	Risk Element	Standard	Requirement(s)	Monitored Function(s)
Québec Specific	Gaps in Program Execution	CIP-005-7	R1	GOP, GO, TO
ERO Enterprise IP	Remote Connectivity	CIP-005-7	R2, R3	GOP, GO, TO
Québec Specific	Physical Security	CIP-006-6	R2	GOP, GO, TO
Québec Specific	Remote Connectivity	CIP-007-6	R1, R2, R4, R5	GOP, GO, TO
ERO Enterprise IP	Remote Connectivity	CIP-007-6	R3	GOP, GO, TO
ERO Enterprise IP	Incident Response	CIP-008-6	R1, R2, R3	GOP, GO, TO
Québec Specific	Incident Response	CIP-008-6	R4	GOP, GO, TO
ERO Enterprise IP	Supply Chain	CIP-010-4	R1	GOP, GO, TO
Québec Specific	Supply Chain	CIP-010-4	R2, R3, R4	GOP, GO, TO
Québec Specific	Gaps in Program Execution	CIP-011-2	R1	GOP, GO, TO
ERO Enterprise IP	Remote Connectivity	CIP-012-1 (Effective 7/1/2024)	R1	GOP, GO, TO
ERO Enterprise IP	Supply Chain	CIP-013-2	R1, R2	GOP, GO, TO
ERO Enterprise IP	Stability Studies	CIP-014-3	R1	TO
ERO Enterprise IP	Physical Security	CIP-014-3	R4, R5	TO
Québec Specific	Gaps in Program Execution	CIP-014-3	R6	TO
Québec Specific	Gaps in Program Execution	EOP-005-3	R14	GOP
ERO Enterprise IP	Extreme Weather Response	EOP-011-2 (Effective 10/1/2024)	R7, R8	GO
ERO Enterprise IP	Inverter-Based Resources	FAC-001-3 (Until 09/30/2024)	R1, R2	GO, TO
ERO Enterprise IP	Inverter-Based Resources	FAC-001-4 (Effective 10/1/2024)	R1, R2	GO, TO
ERO Enterprise IP	Inverter-Based Resources	FAC-002-3 (Until 09/30/2024)	R2	GO
ERO Enterprise IP	Inverter-Based Resources	FAC-002-4 (Effective 10/1/2024)	R2	GO
Québec Specific	Facility Ratings	FAC-008-5	R1, R2, R3, R8	GO, TO
ERO Enterprise IP	Facility Ratings	FAC-008-5	R6	GO, TO
ERO Enterprise IP	Inverter-Based Resources	MOD-026-1	R2	GO
Québec Specific	Gaps in Program Execution	PRC-005-6	R3	GO, TO
Québec Specific	Gaps in Program Execution	PRC-006-NPCC-2	R3	TO
Québec Specific	Gaps in Program Execution	PRC-006-NPCC-2	R10	GO
ERO Enterprise IP	Inverter-Based Resources	PRC-024-2	R1, R2	GO
Québec Specific	Gaps in Program Execution	PRC-027-1 (Effective 10/1/2024)	R1, R3	GO, TO



IV. **Compliance Monitoring**

A. **Compliance Audits**

Table 4 shows the Compliance Audits that will be conducted in 2024.

Table 4: Audit plan for 2024			
Off-site Operations & Planning Audits			
Registered Entities	Acronyms	Functions Audited	Audit Date
Innergex Cartier Énergie S.E.C. L’Anse-à-Valleau wind farm	AAV	GO, GOP	TBD
Innergex Inc. Baie-des-Sables wind farm	BDS	GO, GOP	TBD
Innergex Cartier Énergie S.E.C. Carleton wind farm	CAR	GO, GOP	TBD
Innergex Cartier Énergie S.E.C. Gros-Morne wind farm	GM	GO, GOP	TBD
Parc éolien Mesgi’g Ugju’s’n S.E.C.	MEU	GO, GOP	TBD
Off-site CIP and Operations & Planning Audits			
Registered Entity	Acronym	Functions Audited	Audit Date
Société de transmission électrique de Cedars Rapids Limitée	CRT	TO, TSP	TBD

B. **Self-Certification**

NPCC, as authorized or requested by the Régie, may implement traditional Self-Certifications (e.g., check-the-box) or Guided Self-Certifications on a quarterly basis. The Self-Certification notification from NPCC will identify whether the Self-Certification applies to the entire Reliability Standard or whether it applies to specific requirements and/or sub-requirements. The notification will also identify whether evidence should accompany the Self-Certification and will provide a specific amount of time to respond to the Self-Certification.

In 2024, NPCC does not plan any traditional Self-Certifications or Guided Self-Certifications for Quebec entities.

C. **Spot Checks**

NPCC, as authorized or requested by the Régie, may initiate a Spot Check at any time. NPCC will provide the registered entity at least 20 days advance notice of a Spot Check.



D. Non-Compliance Self-Reporting

A registered entity shall submit a Non-Compliance Self-Report **at the time the registered entity becomes aware that it is not complying** or may not have complied with a Reliability Standard declared in effect by the Régie, or that a change in the severity of a previously reported non-compliance has occurred. Reports will be made through the Régie's *Système de Surveillance de la Conformité au Québec* (SSCQ).

Registered entities should include sufficient information in Self-Reports to permit NPCC to assess the non-compliance and the risk it poses to the reliability of the electric power transmission system. This must include a description, scope, and root cause(s) of the non-compliance. Self-Reports should also include a comprehensive description of any mitigation measures and whether they have concluded or are still in progress. The mitigation measures must correct the issue, address the contributing cause(s), and prevent recurrence.

E. Periodic Data Submittals

For Reliability Standards that contain an obligation to report periodically or to report only after an event occurs, registered entities shall provide a Periodic Data Submittal for the particular requirement as per the deadlines in Table 5.



Table 5: 2024 Periodic Data Submittal Matrix for Québec

Reliability Standard	Requirement	Text	Function	Submit To	Submittal Frequency	Due Dates
BAL-003-2	R1	Each Frequency Response Sharing Group (FRSG) or Balancing Authority that is not a member of a FRSG shall achieve an annual Frequency Response Measure (FRM) (as calculated and reported in accordance with Attachment A) that is equal to or more negative than its Frequency Response Obligation (FRO) to ensure that sufficient Frequency Response is provided by each FRSG or BA that is not a member of a FRSG to maintain Interconnection Frequency Response equal to or more negative than the Interconnection Frequency Response Obligation.	BA	NPCC and Régie through SSCQ	Annually	According to the dates indicated in Attachment A of the BAL-003-2 Reliability Standard - Timeline for Balancing Authority Frequency Response and Frequency Bias Setting Activities.
EOP-004-4	R2	Each Responsible Entity shall report events specified in EOP-004-4 Attachment 1 to the entities specified per their event reporting Operating Plan by the later of 24 hours of recognition of meeting an event type threshold for reporting or by the end of the Responsible Entity's next business day (4 p.m. local time will be considered the end of the business day).	See Standard	NERC	Event driven as per R2	Within 24 hours of recognition of meeting an event type threshold for reporting or by the end of the next business day if the event occurs on a weekend
EOP-008-2	R8	Each Reliability Coordinator, Balancing Authority, and Transmission Operator that has experienced a loss of its primary or backup functionality and that anticipates that the loss of primary or backup functionality will last for more than six calendar months shall provide a plan to its Regional Entity within six calendar months of the date when the functionality is lost showing how it will re-establish primary or backup functionality.	RC/BA/TOP	NPCC and Régie through SSCQ	Event driven as per R8	Within six calendar months of the date when the functionality is lost
FAC-003-4	C.1.4	The applicable Transmission Owner and applicable Generator Owner will submit a quarterly report to its Regional Entity, or the Regional Entity's designee, identifying all Sustained Outages of applicable lines operated within their Rating and all Rated Electrical Operating Conditions as determined by the applicable Transmission Owner or applicable Generator Owner to have been caused by vegetation, except as excluded in footnote 2, and include as a minimum the following: ...	TO/GO	NPCC and Régie through SSCQ	Quarterly, but only if there are FAC-003 events in the quarter.	Within 20 days after the end of the quarter AND only if there was a qualifying event in the previous quarter
PRC-002-2	R12	Each Transmission Owner and Generator Owner shall, within 90-calendar days of the discovery of a failure of the recording capability for the SER, FR or DDR data, either: • Restore the recording capability, or • Submit a Corrective Action Plan (CAP) to the Regional Entity and implement it.	TO/GO	NPCC and Régie through SSCQ	Event driven as per R12	Within 90 calendar days of the discovery of a failure of the recording capability for the SER, FR or DDR data
PRC-023-4	R5	Each Transmission Owner, Generator Owner, and Distribution Provider that sets transmission line relays according to Requirement R1 criterion 12 shall provide an updated list of the circuits associated with those relays to its Regional Entity at least once each calendar year, with no more than 15 months between reports, to allow the ERO to compile a list of all circuits that have protective relay settings that limit circuit capability.	TO/GO/DP	NPCC and Régie through SSCQ	Annually, but only if the entity chooses to set relays using Criterion 12 of R1	If the entity chooses to set relays on circuits according to Criterion 12 of R1, the entity must at least once each calendar year, with no more than 15 months between reports, provide the updated list to NPCC.
PRC-023-4	R6.2	Provide the list of circuits to all Regional Entities, Reliability Coordinators, Transmission Owners, Generator Owners, and Distribution Providers within its Planning Coordinator area within 30 calendar days of the establishment of the initial list and within 30 calendar days of any changes to that list.	PC	NPCC and Régie through SSCQ	Event driven as per R6.2	Within 30 calendar days of the establishment of the initial list and within 30 days of any changes to list



V. **NPCC Submission Attestation**

NPCC attests that this 2024 Québec Implementation Plan is both necessary and sufficient at this time for the compliance monitoring of the Reliability Standards in effect in Québec.