

## Consideration of Comments on Project 2009-01 — SAR for Disturbance and Sabotage Reporting

The Disturbance and Sabotage Reporting SAR Drafting Team (DSR SAR DT) thanks all commenters who submitted comments on the first draft SAR. The SAR was posted for a 30-day public comment period from April 22, 2009 through May 21, 2009. The stakeholders were asked to provide feedback on the documents through a special Electronic Comment Form. There were 40 sets of comments, including comments from more than 120 different people from over 60 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

[http://www.nerc.com/filez/standards/Project2009-01\\_Disturbance\\_Sabotage\\_Reporting.html](http://www.nerc.com/filez/standards/Project2009-01_Disturbance_Sabotage_Reporting.html)

The majority of stakeholders agree that there is a reliability related need to support modifying CIP-001-1 and EOP-004-1. Of those stakeholders providing comments, they predominantly agreed with the reliability-related reason for the SAR but offered the following concerns:

- 1) Concerns with applicability of the requirements: The SAR DT notes that applicability will be determined by the final requirements that are written for the standard.
- 2) Concerns on combining the standards: The SAR DT notes that the Purpose of the SAR indicates that the standards *may* be merged to eliminate redundancy and provide clarity. It will be up to the Standard Drafting team to make this determination through the Standard Development Process (with stakeholder input).
- 3) Concerns with the definition of sabotage and the inclusion of vandalism, thresholds for defining sabotage, etc.
- 4) Concerns on onerous or duplicative reporting: The Brief Description section of the SAR states "Specific references to the DOE form need to be eliminated". This should address its concerns.

The SAR DT does not feel that the SAR should be revised based on these comments. The SAR DT will forward these comments to the Standard Drafting Team for its consideration in the drafting of the standards.

The majority of stakeholders agree with the scope of the SAR. Several stakeholders offered suggestions for items to include in the SAR, however the SAR DT believes that these comments may be too prescriptive to include with the SAR. The team feels that inclusion of these types of comments would prevent the Standard Drafting Team from having the ability to develop standard(s) based on stakeholder consensus. The SAR DT will forward these comments to the Standard Drafting Team for its consideration. Some of the comments received include:

- 1) The inclusion of specific definitions in the SAR (operating personnel, sabotage events, obligations): The SAR DT believes that this would be too prescriptive and believe that this should be addressed by the Standard Drafting Team.
- 2) Consolidate documents covering reporting requirements: The SAR DT agrees and suggests that the Standard Drafting Team investigate a "one-stop-shopping" solution for the various reports required, including the DOE report.

Stakeholders did not identify any associated business practices for consideration under the SAR. One stakeholder identified a related standard that references multi-site sabotage. The team has included a reference to TOP-005, section 2.9 (Appendix 1) in the SAR under Related Standards. Two stakeholders suggested that Business Practices should not be considered in a standard. The SAR DT notes that standard development projects must not invalidate business practices that are already in place and aids in coordination with North American Energy Standards Board (NAESB).

Many stakeholders had comments regarding applicability of the two standards. Based on these comments, the SAR DT has added Transmission Owner, Generator Owner and Distribution Provider to the Applicability section of the SAR as *possible* entities in the standard(s) developed under this SAR as the Standard Drafting team may have a need to include them in the standard(s). The applicability of Load-Serving Entity or Distribution Provider will ultimately be determined by the Standard Drafting Team as it develops the requirements through the Standard Development Process. The three main comments were:

- 1) Regional Reliability Organization applicability: Several commenters do not feel the RRO should be in the standards. The DSR SAR DT concurs and notes that the SAR states that "EOP-004 has some 'fill-in-the-blank' components to eliminate". This will remove the RRO from applicability.
- 2) Load-Serving Entity/Distribution Provider: Several stakeholders do not feel that the standards should be applicable to LSEs, but should apply to Distribution Providers. NERC has recognized, through its Compliance Registry, that there are asset owning LSEs and non-asset owning LSEs. The SAR DT believes that an asset owning LSE may be a Distribution Provider based on the Functional Model v4. The team has added DP to the applicability of the standard as the Standard Drafting team may have a need to include them in the standard(s). The applicability of LSE or Distribution Provider will ultimately be determined by the Standard Drafting Team as it develops the requirements through the Standard Development Process.
- 3) Transmission Owner/Generator Owner: Several stakeholders have indicated a need to include the TO as an applicable entity. A couple of those would also include the GO. The SAR DT discussed the addition of the TO and GO. The team has a concern that there may be duplication of requirements between the TO/TOP and GO/GOP if the TO and GO are added to the SAR. That being said, the team added the TO and GO to the applicability of the SAR so that the Standard Drafting team may consider these entities for applicability. The applicability of requirements will ultimately be determined by the Standard Drafting Team as it develops the requirements through the Standard Development Process.

Stakeholders provided many good comments that should be considered in the development of the standards under this project. The SAR DT does not believe that these comments require any significant revisions to the SAR, but will forward these comments to the Standard Drafting Team for its consideration in drafting the standard(s). The comments include:

- 1) Consolidation of reports: The SAR DT agrees with this concept and will forward the comment to the Standard Drafting Team for its consideration.
- 2) Concerns about pre-determination of combining CIP-001 and EOP-004 into one standard: The SAR states: CIP-001 may be merged with EOP-004 to eliminate redundancies. The two standards may be left separate.

- 3) Reporting criteria in multiple tables: The team agrees that it would be easier if there were only one table. Part of this scope of this project is to eliminate redundancies and make general improvements to the standard. The team also agrees that the requirements developed should be clear in their reliability objective.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Gerry Adamski, at 609-452-8060 or at [gerry.adamski@nerc.net](mailto:gerry.adamski@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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<sup>1</sup> The appeals process is in the Reliability Standards Development Procedures: <http://www.nerc.com/standards/newstandardsprocess.html>.

**Index to Questions, Comments, and Responses**

1. Do you agree that there is a reliability-related reason to support modifying CIP-001-1 and EOP-004-1? If not, please explain in the comment area. ....12

2. Do you agree with the scope of the proposed SAR? If not, please explain what should be added or deleted to the proposed scope. ....20

3. Are you aware of any associated business practices that we should consider with this SAR? If yes, please explain in the comment area. ....38

4. CIP-001-1 applies to the Reliability Coordinator, Transmission Operator, Balancing Authority, Generator Operator, and the Load-serving Entity. EOP-004-1 applies to the same entities, plus the Regional Reliability Organization. Do you agree with the applicability of the existing CIP-001-1 and the existing EOP-004-1? If no, please identify what you believe should be modified.....43

5. If you have any other comments on the SAR or proposed modifications to CIP-001-1 and EOP-004-1 that you haven't provided in response to the previous questions, please provide them here. ....51

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The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

		Commenter	Organization	Industry Segment										
				1	2	3	4	5	6	7	8	9	10	
1.	Group	Jim Case	SERC OC Standards Review Group	X		X								
Additional Member		Additional Organization		Region		Segment Selection								
1.	Al McMeekin	SCE&G		SERC		1, 3, 5								
2.	Eugene Warnecke	Ameren		SERC		1, 3, 5								
3.	Gary Hutson	SMEPA		SERC		1, 3, 5								
4.	Melinda Montgomery	Entergy		SERC		1, 3								
5.	Tom Sims	Southern		SERC		1, 3, 5								
6.	Marc Butts	Southern		SERC		1, 3, 5								
7.	Chris Bradley	BREC		SERC		1, 3, 5								
8.	Tom Kanzlik	SCE&G		SERC		1, 3, 5								
9.	Paul Turner	Ga Systems Operations Corp.		SERC		3								
10.	Phil Creech	Progress Energy Carolinas		SERC		1, 3, 5								
11.	Vicky Budreau	SCPSA		SERC		1, 3, 5, 9								
12.	Renee Free	SCPSCA		SERC		9								
13.	Mike Clements	TVA		SERC		1, 3, 5, 9								
14.	Travis Sykes	TVA		SERC		1, 3, 5								

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	Commenter	Organization	Industry Segment										
			1	2	3	4	5	6	7	8	9	10	
15.	John Troha	SERC	RFC							10			
2.	Group	Harry Tom	Project 2007-02 Operating Personnel Comms Protocols SDT	X	X			X				X	X
<b>Additional Member</b>		<b>Additional Organization</b>		<b>Region</b>				<b>Segment Selection</b>					
1.	Lloyd Snyder	GSOC	SERC									1	
2.	Tom Irvine	HydroOne	NPCC									1, 9	
3.	Alan Allgower	ERCOT	ERCOT									10	
4.	Harvie Beavers	Colmac Clarion/Piney Creek LP	RFC									5	
5.	Mark L. Bradley	ITC	MRO									1	
6.	Mike Brost	JEA	FRCC									1	
7.	William D Ellard	CAISO	WECC									10	
8.	Ronald Goins	MISO	MRO									10	
9.	Leanne Harrison	PJM	RFC									10	
10.	James McGovern	ISO-NE	NPCC									10	
11.	Wayne Mitchell	Entergy	SERC									1	
12.	John Stephens	City Utilities of Springfield	RFC									1	
13.	Fred Waites	Southern Company	SERC									1	
3.	Group	Kenneth D. Brown	PSEG Enterprise Group Inc Companies	X		X							
<b>Additional Member</b>		<b>Additional Organization</b>		<b>Region</b>				<b>Segment Selection</b>					
1.	Clint Bogan	PSEG Fossil LLC	RFC									5	
2.	James Hebson	PSEG Energy Resources & Trade	RFC									6	
3.	Gary Grysko	PSEG Power Connecticut	NPCC									5	
4.	Dominic DiBari	PSEG Texas LLC	ERCOT									5	
4.	Group	Guy Zito	Northeast Power Coordinating Council										X
<b>Additional Member</b>		<b>Additional Organization</b>		<b>Region</b>				<b>Segment Selection</b>					
1.	Ralph Rufrano	New York Power Authority	NPCC									5	
2.	Alan Adamson	New York State Reliability Council	NPCC									10	

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	Commenter	Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
3.	Greg Campoli	New York Independent System Operator	NPCC								2			
4.	Roger Champagne	Hydro-Quebec TransEnergie	NPCC								2			
5.	Kurtis Chong	Independent Electricity System Operator	NPCC								2			
6.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC								1			
7.	Manuel Couto	National Grid	NPCC								1			
8.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC								1			
9.	Brian Evans-Mongeon	Utility Services	NPCC								8			
10.	Mike Garton	Dominion Resources Services, inc.	NPCC								5			
11.	Mike Gildea	Constellation Energy	NPCC								6			
12.	Brian Gooder	Ontario Power Generation Incorporated	NPCC								5			
13.	Kathleen Goodman	ISO - New England	NPCC								2			
14.	David Kiguel	Hydro One Networks, Inc.	NPCC								1			
15.	Michael Lombardi	Northeast Utilities	NPCC								1			
16.	Randy MacDonald	New Brunswick System Operator	NPCC								2			
17.	Bruce Metruck	New York Power Authority	NPCC								6			
18.	Robert Pellegrini	The United Illuminating Company	NPCC								1			
19.	Michael Schiavone	National Grid	NPCC								1			
20.	Michael Sonnelitter	FPL Energy/NextEra Energy	NPCC								5			
21.	Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC								3			
22.	Lee Pedowicz	Northeast Power Coordinating Council	NPCC								10			
23.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC								10			
5.	Group	Michael Gammon	Kansas City Power & Light	X		X		X	X					
<b>Additional Member</b>		<b>Additional Organization</b>		<b>Region</b>			<b>Segment Selection</b>							
1.	Joe Doetzl	Kansas City Power & Light	SPP								1, 3, 5, 6			
2.	John Breckenridge	Kansas City Power & Light	SPP								1, 3, 5, 6			
6.	Group	Ben Li	IRC Standards Review Committee		X									
<b>Additional Member</b>		<b>Additional Organization</b>		<b>Region</b>			<b>Segment Selection</b>							

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	Commenter	Organization	Industry Segment									
			1	2	3	4	5	6	7	8	9	10
1.	James Castle	NYISO	NPCC						2			
2.	Charles Yeung	SPP	SPP						2			
3.	Anita Lee	AESO	WECC						2			
4.	Matt Goldberg	ISO-NE	NPCC						2			
5.	Bill Phillips	MISO	MRO						2			
6.	Steve Myers	ERCOT	ERCOT						2			
7.	Lourdes Estrada-Saliner	CAISO	WECC						2			
7.	Group	Richard Kafka	Pepco Holdings, Inc. - Affiliates									
	<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>						<b>Segment Selection</b>			
1.	Kara Dundas	Conectiv Energy Supply, Inc.	RFC						5			
2.	Tony Gabrielli	Conectiv Energy Supply, Inc.	RFC						5			
3.	George Gacser	Potomac Electric Power Co.	RFC						1, 3, 5			
4.	E. W. Stowe	Pepco Holdings, Inc	RFC						1, 3, 5			
5.	Mark Godfrey	Pepco Holdings, Inc	RFC						1, 3			
8.	Group	Sam Ciccone	FirstEnergy									
	<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>						<b>Segment Selection</b>			
1.	Jim Eckels	FE	RFC						1			
2.	John Martinez	FE	RFC						1			
3.	John Reed	FE	RFC						1			
4.	Dave Folk	FE	RFC						1, 3, 4, 5, 6			
5.	Doug Hohlbaugh	FE	RFC						1, 3, 4, 5, 6			
6.	Larry Hartley	FE	RFC						3			
9.	Group	Jalal Babik	Electric Market Policy									
	<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>						<b>Segment Selection</b>			
1.	Louis Slade		SERC						6			
2.	Mike Garton		NPCC						5			

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10.	Group	Denise Koehn	Bonneville Power Administration	X		X		X	X					
		<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>						<b>Segment Selection</b>				
		1. Theodore Snodgrass	Dispatch	WECC						1				
11.	Group	Michael Brytowski	MRO NERC Standards Review Subcommittee											X
		<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>						<b>Segment Selection</b>				
		1. Carol Gerou	MRO	MRO						10				
		2. Neal Balu	WPS	MRO						3, 4, 5, 6				
		3. Pam Sordet	XCEL	MRO						1, 3, 5, 6				
		4. Joe DePoorter	MGE	MRO						3, 4, 5, 6				
		5. Ken Goldsmith	ALTW	MRO						4				
		6. Jim Haigh	WAPA	MRO						1, 6				
		7. Terry Harbour	MEC	MRO						1, 3, 5, 6				
		8. Joseph Knight	GRE	MRO						1, 3, 5, 6				
		9. Scott Nickels	RPU	MRO						3, 4, 5, 6				
		10. Dave Rudolph	BEPC	MRO						1, 3, 5, 6				
		11. Eric Ruskamp	LES	MRO						1, 3, 5, 6				
12.	Individual	Stephen V. Fisher	Lands Energy Consulting											
13.	Individual	Brent Hebert	Calpine Corporation					X						
14.	Individual	Steve Toth	Covanta					X						
15.	Individual	Harvie Beavers	Colmac Clarion					X						
16.	Individual	Russell A. Noble	Cowlitz County PUD			X								
17.	Individual	Michael Puscas	United Illuminating	X		X								
18.	Individual	George Pettyjohn	Reliant Energy					X						

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				1	2	3	4	5	6	7	8	9	10			
19.	Individual	Judith A. James	Texas Regional Entity													
20.	Individual	Edward C. Stein	self									X				
21.	Individual	Chris Scanlon	Exelon	X		X		X	X							
22.	Individual	Mike Davis	WECC													X
23.	Individual	Jimmy Hartmann	ERCOT ISO		X											
24.	Individual	Rick Terrill	Luminant Power					X								
25.	Individual	Rao Somayajula	ReliabilityFirst Corporation													X
26.	Individual	Tony Kroskey	Brazos Electric Power Cooperative, Inc.	X												
27.	Individual	Paul Golden	PacifiCorp	X		X		X	X							
28.	Individual	Terry Harbour	MidAmerican Energy	X												
29.	Individual	Darryl Curtis	Oncor Electric Delivery	X												
30.	Individual	Chris de Graffenried on behalf of Con Edison & O&R	Consolidated Edison Co. of New York, Inc.	X		X			X							
31.	Individual	Wayne Pourciau	Georgia System Operations Corp.			X										
32.	Individual	Bob Thomas	Illinois Municipal Electric Agency				X									
33.	Individual	Kasia Mihalchuk	Manitoba Hydro	X		X		X	X							
34.	Individual	Jim Sorrels	AEP	X		X		X	X							

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35.	Individual	Greg Rowland	Duke Energy	X		X		X	X					
36.	Individual	Howard Rulf	We Energies			X	X	X						
37.	Individual	Jianmei Chai	Consumers Energy Company			X	X	X						
38.	Individual	Mike Sonnelitter	NextEra Energy Resources, LLC					X						
39.	Individual	D. Bryan Guy	Progress Energy	X		X		X						
40.	Individual	Kirit Shah	Ameren	X		X		X	X					

**Consideration of Comments on Project 2009-01 — SAR for Disturbance and Sabotage Reporting**

**1. Do you agree that there is a reliability-related reason to support modifying CIP-001-1 and EOP-004-1? If not, please explain in the comment area.**

**Summary Consideration:** The majority of stakeholders agree that there is a reliability related need to support modifying CIP-001-1 and EOP-004-1. Of those stakeholders providing comments, they predominantly agreed with the reliability-related reason for the SAR but offered the following concerns:

- 1) Applicability of the requirements: The SAR DT notes that applicability will be determined by the final requirements that are written for the standard.
- 2) Combining the standards: The SAR DT notes that the Purpose of the SAR indicates that the standards *may* be merged to eliminate redundancy and provide clarity. It will be up to the Standard Drafting team to make this determination through the Standard Development Process (with stakeholder input).
- 3) Definition of sabotage and the inclusion of vandalism, thresholds for defining sabotage, etc.
- 4) Onerous or duplicative reporting: The Brief Description section of the SAR states “Specific references to the DOE form need to be eliminated”. This should address any concerns.

The SAR DT will forward these comments to the Standard Drafting Team for its consideration in the drafting of the standards.

Organization	Yes or No	Question 1 Comment
SERC OC Standards Review Group	No	The EOP-004-1 standard is an unnecessary duplication of existing DOE reporting requirements. This essentially exposes an entity to fines by NERC, enforced by FERC, for failure to comply with a DOE regulation, which seems improper to us. In addition, reporting requirements do not have an impact on the reliability of the BES
<p><b>Response: The DSR SAR DT thanks you for your comment. The Brief Description section of the SAR states “Specific references to the DOE form need to be eliminated”.</b></p>		
MidAmerican Energy	No	MidAmerican Energy believes only EOP-004-1 is confusing and needs to be modified or clarified. There is no need to combine the two standards. Standard EOP-004 could be clarified to eliminate references to sabotage which are already covered by CIP-001-1. Standard EOP-004 should be strictly limited to system events, not sabotage.
<p><b>Response: The DSR SAR DT thanks you for your comment. The SAR DT notes that the Purpose of the SAR indicates that the standards <i>may</i> be merged to eliminate redundancy and provide clarity. It will be up to the Standard Drafting Team to make this determination through the Standard Development Process (with stakeholder input).</b></p>		

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Organization	Yes or No	Question 1 Comment
Bonneville Power Administration	No	Eliminating a single standard by consolidating two standards does not improve reliability. All of the defined actions are indeed being taken now.
<p><b>Response: The DSR SAR DT thanks you for your comment. The SAR DT notes that the Purpose of the SAR indicates that the standards <i>may</i> be merged to eliminate redundancy and provide clarity. It will be up to the Standard Drafting team to make this determination through the Standard Development Process (with stakeholder input).</b></p>		
Progress Energy	No	No. It is not clear that the issues listed in a revised standard will improve reliability. Revision based on redundancy is not sufficient reason for combination. Extensive documentation efforts have been made to comply with the current Standards. Unless combining these Standards provides compelling Reliability benefit, it is not worth the industry's resources to revise existing documentation and processes for the sake of eliminating redundancy. Redundancy issues were raised prior to the ERO adopting the initial Standard set into law. We have noted the other issues raised in the SAR, however, it is still unclear where the Reliability benefit of this SAR is evidenced.
<p><b>Response: The DSR SAR DT thanks you for your comment. Industry consensus indicates that eliminating redundancy between standards is required to avoid potential double jeopardy issues with compliance to the standards. Furthermore, one of the FERC Order 693 directives for CIP-001 is:</b></p> <p><b>Explore ways to reduce redundant reporting, including central coordination of sabotage reports and a uniform reporting format.</b></p>		
Kansas City Power & Light	Yes	Agree with the SAR that clarity would be helpful in establishing criteria regarding what constitutes sabotage reporting.
<p><b>Response: The DSR SAR DT thanks you for your comment. One of the FERC Order 693 directives for CIP-001 is:</b></p> <p><b>Define “sabotage” and provide guidance on triggering events that would cause an entity to report an event.</b></p>		
Pepco Holdings, Inc. - Affiliates	Yes	PHI recommends merging these two standards into one.
<p><b>Response: The DSR SAR DT thanks you for your comment. The SAR DT notes that the Purpose of the SAR indicates that the standards <i>may</i> be merged to eliminate redundancy and provide clarity. It will be up to the Standard Drafting team to make this determination through the Standard Development Process (with stakeholder input).</b></p>		
Electric Market Policy	Yes	Comments: Agree with the statement that sabotage is hard to determine in real time by operations staffs. The determination of sabotage should be left up to law enforcement. They have the knowledge and peer contacts needed to adequately determine whether physical or cyber intrusions are merely malicious acts or coordinated efforts (sabotage).

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Organization	Yes or No	Question 1 Comment
		<p>The operators should only be required to report physical and cyber intrusions to law enforcement. All other reporting requirements should apply to law enforcement once a determination of sabotage has been made. If the recommendations above are not to be accepted, then we have the following comments:</p> <p>CIP-001-1</p> <p>1) R1 states entities shall have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi-site sabotage affecting larger portions of the Interconnection. The SAR notes that the industry objects to the multi-site requirement, most likely because the term is ambiguous. If this term remains in the standard, it needs to be clearly defined and responsibilities for obtaining (how do you get this information and from whom?) and distributing need to be included.</p> <p>2) R1 audits have shown confusion over the requirement to make operating personnel aware of sabotage events. The term operating personnel needs to be defined. Are they the individuals responsible for operating the facility, coordinating with other entities (i.e., RC, BA, TOP, GOP, and LSE)? It has been suggested that notification is required to all personnel at a facility. Keep in mind the purpose of the standard is to ensure sabotage events are properly reported, not to address emergency response.</p> <p>3) R1 The SAR (NERC Audit and Observation Team) notes that Registered Entities have processes and procedures in place, but not all personnel have been trained. There is no specific training requirement in the standard.</p> <p>4) R2 &amp; R3 I agree with the SAR that sabotage needs to be defined and these requirements should be more specific with respect to the information to be communicated. It seems to me that the standard should mirror the criteria contained in DOE OE-417. The emphasis should be placed on ensuring that the same information communicated to DOE is shared with the appropriate parties in the Interconnection.</p> <p>5) R4 I agree with the SAR (NERC Audit and Observation Team) comments regarding the intention of this requirement. There is no language that directs contact with FBI or RCMP although that is what is implied by the Purpose statement.</p> <p>6) VRF Comments I'm not sure what is intended by the statement Adequate procedures will insure it is unlikely to lead to bulk electric system instability, separation, or cascading failures? The purpose of the standard is that of communication. No operational decisions or actions are directed by this standard, nor does it require entities to address operational aspects resulting from sabotage.</p> <p>7) The potential exists for overlapping sabotage reporting requirements at nuclear power plants due to multiple regulators (Nuclear Regulatory Commission (NRC) 10 CFR 73 and Federal Energy Regulatory Commission (FERC) NUC-001-1). Some entities may have revised existing NRC driven procedures to accommodate reporting requirements of both regulators. Because of the restrictions placed on NRC driven documents (i.e., procedures are classified as safeguards information), it can be difficult to demonstrate compliance to NERC and/or FERC without ensuring that the individuals are qualified for receipt of such information per 10 CFR 73. Additionally, multiple procedures may have the unintended consequence of delaying appropriate communication. EOP-004-1 Consider removing Attachment 2 as the information is</p>

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Organization	Yes or No	Question 1 Comment
		duplicated in DOE Form OE-417. A simple reference to the form should suffice.
<p><b>Response: The DSR SAR DT thanks you for your comment. The team notes that your comments relate directly to potential revisions of the standard requirements. The team will pass your comments along to the Standards Drafting Team for its consideration. For item 4, one of the FERC Order 693 directives for CIP-001 is:</b></p> <p><b>Define “sabotage” and provide guidance on triggering events that would cause an entity to report an event.</b></p>		
Lands Energy Consulting	Yes	<p>I have worked with 5 Northwest public utilities on developing procedures related to CIP-001-1 and EOP-004-1. All 5 utilities operate electric systems in fairly remote locations and are embedded in a larger utility's Balancing Authority/Transmission Operator area.</p> <p>A. CIP-001-1 - Developing procedures to unambiguously identify acts of sabotage has been particularly challenging for these systems. In general, it's hard for them to determine whether the most prevalent forms of malicious and intentional system damage that they incur - copper theft and gun shot insulators/equipment - should qualify as acts of sabotage. Although none of the systems consider copper theft to be acts of sabotage, two of the systems consider gun shot insulators/equipment to be acts of sabotage. The other systems look for intent to disrupt electric system operations as a key component of their sabotage identification procedures. Additional guidance from NERC in the form of CIP-001-1 modifications or a companion guidelines document on sabotage identification would provide much needed guidance for these procedures.</p> <p>B. EOP-004-1 - This standard was clearly drafted with the larger electric systems in mind. I have one client that serves 3300 commercial/residential customers from 4-115/13 kV substation transformers and one large industrial customer (80% of its energy load) from a 230/13 kV substation. 75% of the client's load is served from three substations attached to a long, 115 kV transmission line operated by the Bonneville Power Administration. Whenever the line relays open on a permanent fault (which happens 2-3 times per year), the client loses over 50% of its customers (but no more than 10-15 MW during winter peak), thereby necessitating the preparation of a Disturbance Report. To allow utilities to concentrate on operating their systems, without fear of violating EOP-004-1 for failure to report trivial outages, I would remove LSEs from the obligation to report disturbances - leave the reporting to the BA/TOP for large outages in their footprint.</p>
<p><b>Response: The DSR SAR DT thanks you for your comment.</b></p> <p><b>A. The team notes that your comments relate directly to potential revisions of the standard requirements. The team will pass your comments along to the Standards Drafting Team for its consideration.</b></p> <p><b>B. NERC has recognized, through its Compliance Registry, that there are asset owning LSEs and non-asset owning LSEs. The SAR DT believes that an asset owning LSE may be a Distribution Provider based on the Functional Model v4. The team has added DP to the applicability of the standard as the Standard Drafting team may have a need to include them in the standard(s). The applicability of LSE or Distribution Provider will ultimately be determined by the Standard Drafting Team as it develops the requirements through the Standard Development Process. The team</b></p>		

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Organization	Yes or No	Question 1 Comment
<b>will pass your comments along to the Standards Drafting Team for its consideration.</b>		
Calpine Corporation	Yes	Communication of facility status or emergencies between merchant generators registered as GOP and the RC, BA, GOP, or LSE in which the facility resides should be coordinated for EOP -004 reporting. The reporting to NERC/DOE should come from the RC, BA, GOP, or LSE.
<b>Response: The DSR SAR DT thanks you for your comment. The team concurs that reporting should be coordinated and will pass your comments along to the Standards Drafting Team for its consideration.</b>		
Covanta	Yes	Yes - the key to Sabotage reporting requirements is identifying what the 'definition' is of an actual or potential 'Sabotage' event. Like any other standard, if FERC/NERC leave it up to 2000+ entities to establish their own definitions of 'Sabotage', you may likely get 2000+ answers. That is not a controlled and coordinated approach. I offer the following definition, "Sabotage - Deliberate or malicious destruction of property, obstruction of normal operations, or injury to personnel by outside agents." Examples of sabotage events could include, but are not limited to, suspicious packages left near site electrical generating or electrical transmission assets, identified destruction of generating assets, telephone/e mail received threats to destroy or interrupt electrical generating efforts, etc." These have passed multiple NERC regional audits and reviews to date.
<b>Response: The DSR SAR DT thanks you for your comment. One of the FERC Order 693 directives for CIP-001 is: Define "sabotage" and provide guidance on triggering events that would cause an entity to report an event. The team will pass your comments along to the Standards Drafting Team for its consideration.</b>		
Cowlitz County PUD	Yes	The standards as written now create reporting on local customer quality of service outage events not related to BPS disturbances. Sabotage reporting has degenerated into reporting of mischievous vandalism and minor theft occurrences. This creates compliance documentation overburden and waste of limited funds needed for true BPS reliability concerns, and also adds nuisance calls to the FBI and Homeland Security.
<b>Response: The DSR SAR DT thanks you for your comment. One of the FERC Order 693 directives for CIP-001 is: Define "sabotage" and provide guidance on triggering events that would cause an entity to report an event. This should address the concern of sabotage vs. vandalism/theft reporting.</b>		
Reliant Energy	Yes	EOP-004-1 indicates that Generators should analyze disturbances on the bulk electrical system or their facilities. Generators do not have the capability of analyzing the bulk electrical system other than Frequency. Even so, generators can not unilaterally respond to what it thinks are disturbances. In the case of CAISO The Participating Generator

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Organization	Yes or No	Question 1 Comment
		Agreement prevents me from making any unilateral moves save for the direst frequency emergencies. If the System operator or Reliability Coordinator informs the generator that there is a disturbance and that logs and readouts etc. are required then the generator should respond with all available information for the subject hours or time. Clearer responsibilities provide clearer results.
<p><b>Response: The DSR SAR DT thanks you for your comment. While the team agrees that generators may not have the capability to analyze events, the team note that you concern is regarding applicability of requirements. The final wording of the requirements developed by the Standard Drafting Team will determine the applicability.</b></p>		
Georgia System Operations Corp.	Yes	There is a need to eliminate burdensome reporting deadlines which interfere with the reliable operations or recovery of the BES. There is also a need to move requirements for reporting to NERC or Regional Entities (except for reporting of threats to physical or cyber security) from the Requirements section of Reliability Standards to elsewhere.
<p><b>Response: The DSR SAR DT thanks you for your comment. Specific revisions to the requirements will be vetted during the standard development process.</b></p>		
Illinois Municipal Electric Agency	Yes	Simplification of reporting requirements should facilitate reliability.
<p><b>Response: The DSR SAR DT thanks you for your comment.</b></p>		
Duke Energy	Yes	We agree that additional clarity is needed regarding sabotage and disturbance reporting. Requirements should be tightened up and triggering events/thresholds of materiality need to be better defined.
<p><b>Response: The DSR SAR DT thanks you for your comment. One of the FERC Order 693 directives for this project is:</b> Define “sabotage” and provide guidance on triggering events that would cause an entity to report an event.</p>		
MRO NERC Standards Review Subcommittee	Yes	
Colmac Clarion	Yes	
United Illuminating	Yes	

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Organization	Yes or No	Question 1 Comment
PSEG Enterprise Group Inc Companies	Yes	
Northeast Power Coordinating Council	Yes	
IRC Standards Review Committee	Yes	
FirstEnergy	Yes	
Texas Regional Entity	Yes	
Edward C. Stein	Yes	
Exelon	Yes	
WECC	Yes	
ERCOT ISO	Yes	
Luminant Power	Yes	
ReliabilityFirst Corporation	Yes	
Brazos Electric Power Cooperative, Inc.	Yes	

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Organization	Yes or No	Question 1 Comment
PacifiCorp	Yes	
Oncor Electric Delivery	Yes	
Consolidated Edison Co. of New York, Inc.	Yes	
Manitoba Hydro	Yes	
AEP	Yes	
We Energies	Yes	
Consumers Energy Company	Yes	
NextEra Energy Resources, LLC	Yes	
Ameren	Yes	

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2. Do you agree with the scope of the proposed SAR? If not, please explain what should be added or deleted to the proposed scope.

**Summary Consideration:** The majority of stakeholders agree with the scope of the SAR. Several stakeholders offered suggestions for items to include in the SAR, however the SAR DT believes that these comments may be too prescriptive to include with the SAR. The team feels that inclusion of these types of comments would prevent the Standard Drafting Team from having the ability to develop standard(s) based on stakeholder consensus. The SAR DT will forward these comments to the Standard Drafting Team for its consideration. Some of the comments received include:

- 1 The inclusion of specific definitions in the SAR (operating personnel, sabotage events, obligations): The SAR DT believes that this would be too prescriptive and believe that this should be addressed by the Standard Drafting Team.
- 2 Consolidate documents covering reporting requirements: The SAR DT agrees and suggests that the Standard Drafting Team investigate a “one-stop-shopping” solution for the various reports required, including the DOE report.

Organization	Yes or No	Question 2 Comment
Project 2007-02 Operating Personnel Comms Protocols SDT	No	<p>The Operating Personnel Communication Protocols standard drafting team respectfully requests that the Sabotage Reporting SAR Drafting Team incorporate the following into your proposed SAR: “Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have procedures for the communication of information concerning the Cyber and Physical emergency alerts in accordance with the conditions described in “Attachment 1 Security Emergency Alerts.”</p> <p>The Operating Personnel Communications Protocols Project 2007-02 was initiated to ensure that real time system operators use standardized communication protocols during normal and emergency operations to improve situational awareness and shorten response time. The SDT developed a new COM-003-1 Standard that has yet to be posted and is dependent upon revising at least two other standards (CIP-001 and TOP Standard).</p> <p>COM-003 contains requirements that specify:</p> <ol style="list-style-type: none"> <li>1. Use of three-part communication;</li> <li>2. English language;</li> <li>3. Common time zone;</li> <li>4. NATO alpha-numeric alphabet;</li> <li>5. Mutually agreed line identifiers;</li> <li>6. The use of pre-defined system condition terminology such as those contained in the RCWG Alert Level Guide and EOP-002-2.</li> </ol>

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Organization	Yes or No	Question 2 Comment
		<p>This request is based on recent NERC Standards Committee direction to our team to incorporate the Reliability Coordinator Working Group’s (RCWG) Alert Level Guide into a Standard. The consensus of our team is that a TOP Standard is the most appropriate location for the Transmission Emergency Alert language from the Guide as the energy emergency alert language is currently described in EOP-002-2. The RCWG Guide proposes the use of pre-defined system condition descriptions for use during emergencies for reliability related formation. This guide was developed in response to a Blackout Report recommendation. Our team placed the Transmission Emergency Alert language into a TOP standard.</p> <p>Since the Sabotage Reporting SAR DT intends to modify CIP-001, we seek your consent to incorporate the cyber and physical security alert language to comply with the wishes of the Standards Committee. We believe that the CIP-001 Standard is the most appropriate location for this language for the following reasons:</p> <ul style="list-style-type: none"> <li>• The levels of emergency conditions related to the cyber and physical security of the electric system is directly related to Critical Infrastructure Protection.</li> <li>• The current version of CIP-001 already requires the timely reporting of actual and suspected security emergency conditions and the use of pre-defined terminology supports the efficient handling of such information.</li> </ul> <p>The OPCP SDT includes the following text for the record. It is a proposed draft revision of CIP-001.</p> <p><b>A. Introduction</b></p> <ol style="list-style-type: none"> <li>1. Title: Security Incidents</li> <li>2. Number: CIP-001-2</li> <li>3. Purpose: To ensure the recognition, communication and response to cyber and physical security incidents suspected or determined to be caused by sabotage.</li> <li>4. Applicability             <ol style="list-style-type: none"> <li>4.1. Reliability Coordinators.</li> <li>4.2. Balancing Authorities.</li> <li>4.3. Transmission Operators.</li> <li>4.4. Generator Operators.</li> <li>4.5. Load Serving Entities.</li> </ol> </li> <li>5. Effective Date: The standard is effective the first day of the first calendar quarter after applicable regulatory approvals (or the standard otherwise becomes effective the first day of the first calendar quarter after NERC OT adoption in those jurisdictions where regulatory approval is not required).</li> </ol>

Consideration of Comments on Project 2009-01 — SAR for Disturbance and Sabotage Reporting

Organization	Yes or No	Question 2 Comment
		<p><b>B. Requirements</b></p> <p>R1. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the recognition of and for making their operating personnel aware of security threats on its facilities and multi site security threats affecting larger portions of the Interconnection.</p> <p>R2. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the communication of information concerning the physical and cyber security status of their facilities in accordance with the conditions described in Attachment 1-CIP-001-1.</p> <p>R3. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall provide its operating personnel with security threat or incident response guidelines, including personnel to contact, for reporting security threats and incidents.</p> <p>R4. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials and develop reporting procedures as appropriate to their circumstances.</p> <p><b>C. Measures</b></p> <p>M1. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have and provide upon request a procedure (either electronic or hard copy) as defined in Requirement 1</p> <p>M2. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have and provide upon request the procedures or guidelines that will be used to confirm that it meets Requirements 2 and 3.</p> <p>M3. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have and provide upon request evidence that could include, but is not limited o procedures, policies, a letter of understanding, communication records, or other equivalent evidence that will be used to confirm that it has established communications contacts with the applicable, local FBI or CMP officials to communicate sabotage events (Requirement 4).</p> <p><b>D. Compliance</b></p> <p>1. Compliance Monitoring Process</p> <p>1.1. Compliance Enforcement Authority Regional Entity</p> <p>1.2. Compliance Monitoring Period and Reset</p> <p>One or more of the following methods will be used to verify compliance:</p> <p>- Compliance Audits</p>

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Organization	Yes or No	Question 2 Comment
		<ul style="list-style-type: none"> <li>- Self-Certifications</li> <li>- Spot Checking</li> <li>- Compliance Violation Investigations</li> <li>- Self-Reporting</li> <li>- Complaints</li> </ul> <p>1.3. Data Retention</p> <p>The Transmission Operator, Transmission Owner, Balancing Authority, Reliability Coordinator, Generator Operator and Distribution Provider shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:</p> <ul style="list-style-type: none"> <li>o The Transmission Operator, Transmission Owner, Balancing Authority, Reliability Coordinator, Generator Operator and Distribution Provider shall retain its current, in force document and any documents in force since the last compliance audit.</li> <li>o If a Transmission Operator, Transmission Owner, Balancing Authority, Reliability Coordinator, Generator Operator or Distribution Provider is found non-compliant, it shall keep information related to the non-compliance until found compliant.</li> <li>o The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.</li> </ul> <p>1.4. Additional Compliance Information</p> <p>None.</p> <p>2. Levels of Non-Compliance:</p> <p>2.1. Level 1: There shall be a separate Level 1 non-compliance, for every one of the following requirements that is in violation:</p> <ul style="list-style-type: none"> <li>2.1.1 Does not have procedures for the recognition of and for making its operating personnel aware of sabotage events (R1).</li> <li>2.1.2 Does not have procedures or guidelines for the communication of information concerning sabotage events to appropriate parties in the Interconnection (R2).</li> <li>2.1.3 Has not established communications contacts, as specified in R4.</li> </ul> <p>2.2. Level 2: Not applicable.</p>

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Organization	Yes or No	Question 2 Comment
		<p>2.3. Level 3: Has not provided its operating personnel with sabotage response procedures or guidelines (R3).</p> <p>2.4. Level 4: Not applicable.</p> <p>E. Regional Differences None.</p> <p>Version History            Version Date Action Change Tracking            0 April 1, 2005 Effective Date New            0 August 8, 2005 Removed "Proposed" from Effective Date            Errata 1 November 1, 2006 Adopted by Board of Trustees            Amended 1 April 4, 2007 Regulatory approval — Effective Date            New 2 March 2009 Added SEA attachment and updates to Effective Date and compliance sections. New</p> <p><b>Attachment 1-CIP-001-2 Physical Security Emergency Alerts</b></p> <p>General requirements</p> <p>1. Initiation by Reliability Coordinator.</p> <p>A Physical Security Emergency Alert may be initiated only by a Reliability Coordinator at:</p> <ul style="list-style-type: none"> <li>a. The Reliability Coordinator's own decision,</li> <li>b. By request from a Transmission Operator,</li> <li>c. By request from a Balancing Authority, or</li> <li>d. By request from federal, state, or cal Law Enforcement Officials.</li> </ul> <p>2. Situations for initiating alert.</p> <p>An Alert may be initiated for the following reasons:</p> <ul style="list-style-type: none"> <li>a. A physical threat affecting a control center, grid or generator asset has been identified, or</li> <li>b. A physical attack affecting a control center, grid or generator asset has occurred or is imminent.</li> </ul> <p>3. Notification.</p> <p>A Reliability Coordinator who initiates a Physical Security Emergency Alert shall notify all Transmission Operators and Balancing Authorities in its Reliability Area. The Reliability Coordinator shall also notify other Reliability Coordinators of the situation via the Reliability Coordinator Information System (RCIS) using the "CIP" category. Additionally, conference calls between Reliability Coordinators shall be held as necessary to communicate system conditions.</p> <p>The Reliability Coordinator shall also notify all Transmission Operators and Balancing Authorities in its Reliability Area and other Reliability Coordinators when the alert has changed levels or ended.</p>

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Organization	Yes or No	Question 2 Comment
		<p>Physical Security Emergency Alert Levels</p> <p>To ensure that all Reliability Coordinators clearly understand potential and actual Physical Security Emergency Alerts, NERC as established three levels of Security Emergency Alerts. The Reliability Coordinators will use these terms when explaining security alerts to each other. The Reliability Coordinator may declare whatever alert level is necessary, and need not proceed through the alerts sequentially.</p> <p>1. Alert 1 – “Control Center / Bulk Electric system asset threat identified” Circumstances: A credible threat of physical attack on a Bulk Electric System asset has been communicated to the Reliability Coordinator. No physical attack has occurred at this point. Determining the credibility of any threat is a subjective process, but the following factors should be considered:</p> <ul style="list-style-type: none"> <li>a. The nature and specificity of the threat,</li> <li>b. The timing of the threat,</li> <li>c. Mode of threat communication, and</li> <li>d. The criticality of the threatened asset. During a Physical Security Emergency Alert Level 1, Reliability Coordinators, Transmission Operators and Balancing Authorities shall have the following responsibilities: <ul style="list-style-type: none"> <li>i. Notification: The Reliability Coordinator responsible for initiating the Physical Security Emergency Alert shall post the declaration of the alert level along with the location of the affected facility on the RCIS under “CIP” and notify all Transmission Operators and Balancing Authorities in its Reliability Area.</li> <li>ii. Updating Status during the Physical Security Emergency Alert The declaring Entity shall update the reliability Coordinator of any changes in the situation until the Alert Level 1 is terminated. The Reliability Coordinator shall update the RCIS as changes occur.</li> </ul> </li> </ul> <p>2. Alert 2 – “Verified Physical attack at a single site” circumstances: A Reliability Coordinator, Transmission Operator, or Balancing Authority has identified a physical attack upon a control center, generator asset, or other bulk electric system asset. During a Physical Security Emergency Alert Level 2, Reliability Coordinators, Transmission Operators and Balancing Authorities shall have the following responsibilities:</p> <ul style="list-style-type: none"> <li>i. Notification: The Reliability Coordinator responsible for initiating the Physical Security Emergency Alert shall post the declaration of the alert level along with the location of the affected facility on the RCIS under “CIP” and notify all Transmission Operators and Balancing Authorities in its Reliability Area.</li> <li>ii. Updating Status during the Physical Security Emergency Alert The Declaring Entity shall update the Reliability Coordinator of the situation a minimum of once per hour until the Alert Level 2 is terminated. The Reliability Coordinator shall update the RCIS as changes occur.</li> </ul> <p>3. Alert 3– “Verified Physical attack at multiple sites” Circumstances: Multiple attacks have been confirmed on control centers, generator assets or other bulk electric system assets. A Reliability Coordinator shall declare Physical Security</p>

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Organization	Yes or No	Question 2 Comment
		<p>Emergency Alert 3 whenever:</p> <ul style="list-style-type: none"> <li>a. A Transmission Operator or Balancing Authority reports multiple physical attacks on bulk electric system assets,</li> <li>b. Multiple Transmission Operators or Balancing authorities report one or more physical attacks on their bulk electric system assets.</li> <li>i. Notification: The Reliability Coordinator responsible for initiating the Physical Security Emergency Alert shall post the declaration of the alert level along with the location of the affected facility on the RCIS under “CIP” and notify all Transmission Operators and Balancing Authorities in its Reliability Area.</li> <li>ii. Updating Status during the Physical Security Emergency Alert The declaring Entity(ies) shall update the Reliability Coordinator of the situation a minimum of once per hour until the Alert Level 3 is terminated. The Reliability Coordinator shall update the RCIS as changes occur.</li> </ul> <p>4. Alert 0 – “Termination of Alert Level” Circumstances: The threat which prompted the Physical Security Emergency Alert Level has diminished or has been removed.</p> <ul style="list-style-type: none"> <li>i. Notification The Reliability Coordinator responsible for initiating the Physical Security Emergency Alert shall notify all other Reliability Coordinators via the RCIS, and it shall also notify all Transmission Operators and Balancing Authorities in its Reliability Area that the Alert Level has been terminated.</li> </ul> <p>Cyber Security Emergency Alerts Cyber Assets – Those programmable electronic devices and communication networks, including hardware, software, and data, associated with bulk electric system assets.</p> <p>Cyber Security Incident - Any malicious act or suspicious event that compromises, or attempts to compromise, the electronic or physical security perimeter of a critical cyber asset or disrupts or attempts to disrupt the operation of a critical cyber asset.</p> <p>Critical Cyber Asset – Those cyber assets essential to the reliable operation of critical assets.</p> <p>Electronic Security Perimeter – The logical border surrounding the network or group of sub-networks to which the critical cyber assets are connected, and for which access is controlled.</p> <p>Physical Security Perimeter – The physical border surrounding computer rooms, telecommunications rooms, operations centers and other locations in which critical cyber assets are housed and for which access is controlled.</p> <p>General Requirements</p> <p>1. Initiation - A Cyber Security Emergency Alert shall be initiated by:</p> <ul style="list-style-type: none"> <li>a. The Reliability Coordinator’s analysis,</li> <li>b. By request from any NERC functional Model entity that Com-003-0 is applicable to.</li> </ul>

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Organization	Yes or No	Question 2 Comment
		<p>c. By request from federal, state, or local Law Enforcement Officials.</p> <p>2. Situations for initiating alert. An Alert shall be initiated for the following reasons:</p> <p>a. A cyber threat affecting a control center or bulk electric system asset has been identified, or</p> <p>b. A cyber attack affecting a control center or bulk electric system has occurred or is imminent.</p> <p>3. Notification.</p> <p>An entity who initiates a Cyber Security Emergency Alert shall make notification as per the NERC Functional model or as Regional / local instruction. The Reliability Coordinator shall notify FBI local office, Electricity Sector Information Sharing Analysis Center (ESISAC) and Department of Homeland Security. The Reliability Coordinator shall also notify as necessary other Reliability Coordinators of the situation via the Reliability Coordinator Information System (RCIS) using the "CIP" category. The Reliability Coordinator shall notify all Transmission Operators and Balancing Authorities in its Reliability Area and other Reliability Coordinators when the alert has changed levels or ended.</p> <p>Cyber Security Emergency Alert Levels</p> <p>To ensure that all applicable entities clearly understand potential and actual Cyber Security Emergency Alerts, three levels of Security Emergency Alerts shall be used.</p> <p>The Reliability Coordinators will use these terms when communicating security alerts to each other. When declaring the applicable alert level it is important to note that the applicable level can be determined without sequentially proceeding through levels.</p> <p>As an example given circumstances an Alert Level 3 could be called without previously being in an Alert Level 1 or Level 2 state.</p> <p>1. Alert 1 – "Verified Control Center / Bulk Electric System Cyber Asset threat identified or imminent" What is "verified" - unknown or unauthorized access to a cyber device, unknown or unauthorized change to a cyber device (i.e., config file, ICS, firmware change. 'Verified' could mean the elimination of a false positive in your security monitoring system. 'Verified' could also be the differentiation between malicious and non-malicious (ie human error, not following policy, etc) intent. What is a "threat" - A threat can be perceived as any action or event that occurs where the monitoring authority was not previously made aware that that action would occur. With flimsy change control or access controls, field staff or technical staff performing troubleshooting or other maintenance may access or change devices without notifying the monitoring entity. The monitoring entity would have to treat this as a threat and take appropriate action to either isolate that device from the rest of the system, notify appropriate authority, dispatch a crew, etc.</p> <p>Examples of threats - Over and above the examples above, another threat example could be a notification from DHS or other security agency that they have reason to believe a hack, virus or other cyber terrorism activity could occur. Also, noticing a distinct change in network traffic which could imply someone has intercepted your data and can manipulate</p>

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Organization	Yes or No	Question 2 Comment
		<p>before sending it from the control room to the device being controlled or manipulating the data coming from the device before a controller seeing it and forcing them to perform an incorrect control event in reaction to erroneous data.</p> <p>Circumstances: A credible threat of Cyber attack on a Control Center or Bulk Electric System asset has been communicated to the Reliability Coordinator. No cyber attack has occurred t this point. Determining the credibility of any threat is a subjective process, but the following factors should be considered:</p> <ul style="list-style-type: none"> <li>a. The nature and specificity of the threat,</li> <li>b. The timing of the threat,</li> <li>c. Mode of threat communication, and</li> <li>d. The criticality of the threatened asset. During a Cyber Security Emergency Alert Level 1, applicable entities shall have the following responsibilities: <ul style="list-style-type: none"> <li>i. Notification An entity who initiates a Cyber Security Emergency Alert Level 1 shall make notification as per the NERC Functional model r as Regional / local instruction. The Reliability Coordinator shall post the declaration of the alert level long with the location of the affected facility on the RCIS under “CIP” and notify all Transmission Operators and Balancing Authorities in its Reliability Area. The Reliability Coordinator shall also notify as necessary the BI local office, Electricity Sector Information Sharing Analysis Center (ESISAC) and Department of Homeland Security.</li> <li>ii. Updating Status during the Cyber Security Emergency Alert The declaring Entity shall update those applicable entities of any changes in the situation until the Alert Level 1 is terminated. The Reliability Coordinator shall update the RCIS as changes occur.</li> </ul> </li> </ul> <p>2. Alert 2 – “Verified Cyber attack on a Control Center or Bulk Electric System asset”</p> <p>Circumstances: An applicable entity has identified a cyber attack upon a control center or bulk electric system asset. During a Cyber Security Emergency Alert Level 2, applicable entities shall have the following responsibilities:</p> <ul style="list-style-type: none"> <li>i. Notification An entity who initiates a Cyber Security Emergency Alert Level 2 shall make notification as per the NERC Functional model or as Regional / cal instruction. The Reliability Coordinator responsible shall post the declaration of the alert level along with the location of the affected facility on the RCIS under “CIP” and notify all Transmission Operators and Balancing Authorities in its Reliability Area. The Reliability Coordinator shall also notify the FBI local office, Electricity Sector Information Sharing Analysis Center (ESISAC) and Department of Homeland Security.</li> <li>ii. Updating Status during the Cyber Security Emergency Alert The declaring Entity shall provide updates of the situation a minimum of once per hour until the Alert Level 2 is terminated. The Reliability Coordinator shall update the RCIS as changes occur.</li> </ul>

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Organization	Yes or No	Question 2 Comment
		<p>3. Alert 3 – “Verified Cyber attack at one or more Control Center or Bulk Electric System cyber asset”</p> <p>Circumstances: An applicable entity has identified a cyber attack upon a control center or bulk electric system asset and shall declare a Cyber Security Emergency Alert 3 whenever:</p> <ul style="list-style-type: none"> <li>a. A Transmission Operator or Balancing Authority reports one or more cyber attacks on bulk electric system that render an asset(s) unavailable.</li> <li>i. Notification An entity who initiates a Cyber Security Emergency Alert Level 3 shall make notification as per the NERC Functional model or as Regional / local instruction. The Reliability Coordinator shall post the declaration of the alert level along with the location of the affected facility on the RCIS under “CIP” and notify all Transmission Operators and Balancing Authorities its Reliability Area. The Reliability Coordinator shall also notify the FBI local office, Electricity Sector Information Sharing Analysis Center (ESISAC) and Department of Homeland Security.</li> <li>ii. Updating Status during the Cyber Security Emergency Alert The declaring Entity(ies) shall provide an update of the situation minimum of once per hour until the Alert Level 3 is terminated. The Reliability Coordinator shall update he RCIS as changes occur.</li> </ul> <p>4. Alert 0 – “Termination of Alert Level” Circumstances: The threat which prompted the Cyber Security Emergency Alert Level has diminished or has been removed. i. Notification An entity who initiates a Cyber Security Emergency Alert shall make notification as per the NERC Functional model or as Regional / local instruction when situation has diminished or returned to normal. The Reliability Coordinator shall notify all other Reliability Coordinators via the RCIS, and it shall also notify all Transmission Operators and Balancing Authorities in its Reliability Area that the Alert Level has been terminated.</p>
<p><b>Response: The DSR SAR DT thanks you for your comment. The standards in this Project 2009-01 SAR are designed to specify reporting requirements for disturbance and sabotage events. The DSR SAR DT believes that the suggested additions go beyond the intended scope of the revisions to the standards, and do not feel that communications protocols belong in these reporting standards. The proposed revisions and Alert Levels are real-time requirements, and the team feels that these would be more appropriately addressed in an IRO or COM standard.</b></p>		
<p>Northeast Power Coordinating Council</p>	<p>No</p>	<p>The SAR needs to be more specific in defining its objectives.</p> <p>CIP-001Requirement R1 currently states:</p> <p>R1. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi-site sabotage affecting larger portions of the Interconnection.</p> <p>The SDT needs to include the following objectives:</p> <p>1. Develop clear definitions for the terms “operating personnel” and “sabotage events.” The definition of “operating personnel,” should be clarified and limited to staff at BES facilities. Operating personnel should report only those events</p>

Consideration of Comments on Project 2009-01 — SAR for Disturbance and Sabotage Reporting

Organization	Yes or No	Question 2 Comment
		<p>which meet a clear, recognizable threshold as reportable potential sabotage events. There should be a consistent continent-wide list of examples or typical reportable and non-reportable events to help guide operating personnel. The term “sabotage event” needs to be defined. Clarification is required regarding when the determination of a sabotage event is made, e.g., upon first observation (requiring operating personnel be educated in discerning sabotage events), or upon later investigation by trained security personnel and law enforcement individuals. The terms potential or suspected sabotage event for reporting purposes should be clarified or defined.</p> <p>2. Define the obligations of Registered Entity operating personnel - who are required to be aware of such “sabotage events,” e.g., who, what, where, when, why and how, and what they are to do in response to this awareness. The SDT should clarify the use of the term “aware” in the standard. “Aware” can be interpreted in accordance with its largely passive, dictionary-based meaning, where being “aware” simply means knowing about something, such as a sabotage event. Alternatively, the Reliability Standard meaning of “aware” could refer to more active wording, involving more than mere awareness, e.g., “alert and quick to respond,” pointing to and requiring a specific affirmative response, i.e., reporting to the appropriate systems, governmental agencies, and regulatory bodies.</p> <p>EOP-004 - The SDT needs to work on the following areas.</p> <p>1. NERC reporting needs to be clarified. For example, Attachment 1 paragraph 6c states: Introduction “The entity on whose system a reportable disturbance occurs shall notify NERC ... 6. Any action taken by a Generator Operator, Transmission Operator, Balancing Authority, or Load-Serving Entity that results in: c. Failure, degradation, or misoperation of system protection, special protection schemes, remedial action schemes, or other operating systems that do not require operator intervention, which did result in, or could have resulted in, a system disturbance - The sense of Attachment 1 is internally inconsistent between the introduction (“occurs”) and the required actions in 6c (could have resulted in a system disturbance). The initial intent appears to be only to report actual system disturbances. Yet, paragraph 6c adds the phrase “or could have resulted in” a potential system disturbance. This inconsistency should be clarified.</p>
<p><b>Response: The DSR SAR DT thanks you for your comment.</b></p> <p><b>CIP-001: The inclusion of specific definitions in the SAR as you suggest (operating personnel, sabotage events, obligations) are too prescriptive and could prevent better definitions from being developed during the Standards Development stage of the project. The team will pass your comments along to the standard drafting team for its consideration.</b></p> <p><b>EOP-004: Your comment addresses specific revisions to the standard. The team will pass your comments along to the standard drafting team for its consideration.</b></p>		
Kansas City Power & Light	No	Agree with the scope of the SAR except for the applicable entities. See response to question #4.
<p><b>Response: The DSR SAR DT thanks you for your comment. Please see response to Q4.</b></p>		

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Organization	Yes or No	Question 2 Comment
MRO NERC Standards Review Subcommittee	No	The MRO NSRS would like to keep the references to the DOE reporting form.
<p><b>Response: The DSR SAR DT thanks you for your comment. The DSR SAR DT understands your comment to indicate that you would like to see a “one stop” reporting form for disturbances and sabotage events. The DSR SAR DT agrees with you and will pass this comment along to the standard drafting team for its consideration in developing the standard(s).</b></p>		
Lands Energy Consulting	No	I would like to see the SAR expanded to cover the issues I mentioned in my prior comment. Otherwise, the scope of the SAR looks fine to me.
<p><b>Response: The DSR SAR DT thanks you for your comment. Please see response to Q1 on other issues.</b></p>		
Bonneville Power Administration	No	Leave as is, all requirements for reporting are now covered. A common definition of sabotage is already widely available.
<p><b>Response: The DSR SAR DT thanks you for your comment. Most stakeholders desire more clarity around the definition of sabotage as well as examples of what is and is not sabotage as opposed to vandalism.</b></p>		
Cowlitz County PUD	No	<p>Added to the scope:</p> <p>For EOP-004 add a provision for a reporting flow rather than everything going to the RE and NERC. That is something going like the DP and TOP reports to the BA, the BA to the RE, and the RE to NERC. This would allow for multiple related reports to be combined into a single coherent report as the reporting goes up the chain.</p> <p>For CIP-001 consider reporting flow as above with local law enforcement notification. Let an upper entity in the reporting chain decide when to contact Federal Agencies such as the BA or the RC.</p>
<p><b>Response: The DSR SAR DT thanks you for your comment. The DSR SAR DT feels that your comments are “how” comments that should be addressed in standard drafting stage. The team will pass this comment along to the standard drafting team for its consideration.</b></p>		
Reliant Energy	No	I think Generator operators should be excluded except to provide requested information from the System Operator or Reliability coordinator.
<p><b>Response: The DSR SAR DT thanks you for your comment. Other commenters have questioned the ability of Generator Operators to have a wide area view and to be able to analyze disturbances on the system. The team agrees that generators may not have a wide area view and the capability to analyze system events. The final wording of the requirements (i.e. reporting vs. data provision) developed by the Standard Drafting Team will</b></p>		

**Consideration of Comments on Project 2009-01 — SAR for Disturbance and Sabotage Reporting**

Organization	Yes or No	Question 2 Comment
<p><b>determine the applicability to GOPs. The team will pass your comment on to the Standard Drafting Team for its consideration.</b></p>		
ERCOT ISO	No	<p>The scope should be modified to provide for a different treatment of reporting requirements that are administrative in nature, or that are after-the-fact (thus cannot impact reliability unless analysis and follow-up is not performed; even then, the impact would be at some future time). Reporting requirements which are of the nature to assist in identification of system concerns or which serve to prevent or mitigate on-going system problems (including, but not limited to, actual or attempted sabotage activity) should remain in standards, but should be separate and apart from the administrative reporting.</p>
<p><b>Response: The DSR SAR DT thanks you for your comment. The team concurs with the concepts on reporting as you suggest, however the team does not feel that this should be addressed in the SAR. The team suggests that this is more appropriately addressed in the standard drafting process, and the team will pass your comment along to the standard drafting team for its consideration in drafting the standard.</b></p>		
MidAmerican Energy	No	<p>See the responses to questions 1 and 5.</p>
<p><b>Response: The DSR SAR DT thanks you for your comment. Please see responses to Q1 and Q5.</b></p>		
We Energies	No	<p>Consider including the sabotage issues in IRO-014-1 R 1.1.1 footnote 1 and TOP-005-1 Attachment 1, 2.9.</p>
<p><b>Response: The DSR SAR DT thanks you for your comment. The team has added references to these two standards in the “Related Standards” section for the SAR.</b></p>		
NextEra Energy Resources, LLC	No	<p>The scope of the SAR should not include Generator Operators.</p>
<p><b>Response: The DSR SAR DT thanks you for your comment. Other commenters have questioned the ability of Generator Operators to have a wide area view and to be able to analyze disturbances on the system. The team agrees that generators may not have a wide area view and the capability to analyze system events. The final wording of the requirements (i.e. reporting vs. data provision) developed by the Standard Drafting Team will determine the applicability to GOPs. The team will pass your comment on to the Standards Drafting Team for its consideration.</b></p>		
Progress Energy	No	<p>No. If this SAR moves forward other standards may need to be considered. For example, in CIP-008, incident reporting for cyber incidents leads to filing of the OE-417 form.</p>
<p><b>Response: The DSR SAR DT thanks you for your comment. The SAR states “Specific references to the DOE form need to be eliminated.” This will remove the linkage that you identify between CIP-001 and CIP-008. There is also a directive from FERC Order 693 in the SAR that states:</b></p>		

Consideration of Comments on Project 2009-01 — SAR for Disturbance and Sabotage Reporting

Organization	Yes or No	Question 2 Comment
<p>Consider FirstEnergy’s suggestions to differentiate between cyber and physical security sabotage and develop a threshold of materiality.</p> <p><b>This allows the standard drafting team to delineate physical and cyber assets. The DSR SAR DT also notes that CIP-008 might be a good framework for drafting the standard requirements pertaining to sabotage and disturbance reporting of physical assets.</b></p>		
Ameren	No	<p>There seems to be an open slate including the following language in the scope. The development may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards (see tables for each standard at the end of this SAR for more detailed information). The unnamed improvements should be limited to those requirements that relate only to Disturbance and Sabotage NOT a general wish list (or witch hunt).</p>
<p><b>Response: The DSR SAR DT thanks you for your comment. The passage that you mention is the intent of each SAR and is a stock statement that is included in almost every SAR. The SAR is limited to the standards listed in the SAR which is approved by the NERC SC to move to standards development.</b></p>		
Consolidated Edison Co. of New York, Inc.	No	<p>GENERAL CECONY and ORU support the general objectives of the SAR to merge existing standards CIP-001-1 Sabotage Reporting and EOP-004-1 Disturbance Reporting to improve clarity and remove redundancy.</p> <p>However, the SAR needs to be more specific in defining its objectives.</p> <p>CIP-001Requirement R1 currently states:</p> <p>R1. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi-site sabotage affecting larger portions of the Interconnection.</p> <p>The SDT needs to include the following objectives:</p> <ol style="list-style-type: none"> <li>1. Develop clear definitions for the terms operating personnel and sabotage events. The definition of operating personnel, should be clarified and limited to staff at BES facilities. Operating personnel should report only those events which meet a clear, recognizable threshold as reportable potential sabotage events. There should be a consistent continent-wide list of examples or typical reportable and non-reportable events to help guide operating personnel. The term sabotage event needs to be defined. Clarification is required regarding when the determination of a sabotage event is made, e.g., upon first observation (requiring operating personnel be educated in discerning sabotage events), or upon later investigation by trained security personnel and law enforcement individuals. The terms potential or suspected sabotage event for reporting purposes should be clarified or defined.</li> <li>2. Define the obligations of Registered Entity operating personnel - who are required to be aware of such sabotage events, e.g., who, what, where, when, why and how, and what they are to do in response to this awareness. The SDT should clarify the use of the term aware in the standard. Aware can be interpreted in accordance with its largely passive, dictionary-</li> </ol>

**Consideration of Comments on Project 2009-01 — SAR for Disturbance and Sabotage Reporting**

Organization	Yes or No	Question 2 Comment
		<p>based meaning, where being aware simply means knowing about something, such as a sabotage event. Alternatively, the Reliability Standard meaning of aware could refer to more active wording, involving more than mere awareness, e.g., alert and quick to respond, pointing to and requiring a specific affirmative response, i.e., reporting to the appropriate systems, governmental agencies, and regulatory bodies.</p> <p>EOP-004 - The SDT needs to work on the following areas.</p> <p>1. NERC reporting needs to be clarified. For example, Attachment 1 paragraph 6c states:</p> <p>Introduction The entity on whose system a reportable disturbance occurs shall notify NERC ... 6. Any action taken by a Generator Operator, Transmission Operator, Balancing Authority, or Load-Serving Entity that results in: ?c. Failure, degradation, or misoperation of system protection, special protection schemes, remedial action schemes, or other operating systems that do not require operator intervention, which did result in, or could have resulted in, a system disturbance.</p> <p>The sense of Attachment 1 is internally inconsistent between the introduction (occurs) and the required actions in 6c (could have resulted in a system disturbance). The initial intent appears to be only to report actual system disturbances. Yet, paragraph 6c adds the phrase or could have resulted in a potential system disturbance. This inconsistency should be clarified.</p>
<p><b>Response: The DSR SAR DT thanks you for your comment.</b></p> <p><b>CIP-001: The inclusion of specific definitions in the SAR as you suggest (operating personnel, sabotage events, obligations) are too prescriptive and could prevent better definitions from being developed during the standard drafting stage of the project. The team will pass your comments along to the standard drafting team for its consideration.</b></p> <p><b>EOP-004: Your comment addresses specific revisions to the standard. The team will pass your comments along to the standard drafting team for its consideration.</b></p>		
Georgia System Operations Corp.	No	<p>The scope of the SAR should be to move all requirements to report to NERC or Regional Entities out of the Requirements section of all Reliability Standards to elsewhere. This does not include reporting, communicating, or coordinating between reliability entities. The NERC/Region reporting requirements could be consolidated in another document and referenced in the Supporting References section of the Reliability Standards. The deadlines for reporting should be changed to realistic timeframes that do not interfere with operating the BES or responding to incidents yet still allow NERC and the Regions to accomplish their missions.</p>
<p><b>Response: The DSR SAR DT thanks you for your comment. The team does not feel that this should be addressed explicitly in the SAR, but suggests that this is more appropriately addressed in the standard drafting stage for full industry vetting of the concepts. The team will pass your comment along to the standard drafting team for its consideration in developing the standard.</b></p>		

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Organization	Yes or No	Question 2 Comment
AEP	No	Sabotage is a term of intent that is often determined after the fact by the registered entity and/or law enforcement officials. In fact, it is often difficult to determine in real-time the intent of a suspicious event. We would suggest that suspicious events become reportable at the point that the event is determined to have had sabotage intent. The entities should have a methodology to collect evidence, to have the evidence analyzed, and to report those events that are determined to have had the intent of sabotage.
<p><b>Response: The DSR SAR DT thanks you for your comment. The team concurs that it is difficult to determine sabotage in real-time. The team does not feel that this should be addressed explicitly in the SAR and suggests that this is more appropriately addressed in the standard drafting stage for full industry vetting of the concepts. The team will pass your comment along to the standard drafting team for its consideration in developing the standard.</b></p>		
Duke Energy	No	While we agree with the need for clarity in sabotage and disturbance reporting, we believe that the Standards Drafting Team should carefully consider whether there is a reliability-related need for each requirement. Some disturbance reporting requirements are triggered not just to assist in real-time reliability but also to identify lessons-learned opportunities. If disturbance and sabotage reporting continue to be reliability standards, we believe that all linkages to lessons-learned/improvements need to be stripped out. We have other forums to identify lessons-learned opportunities and to follow-up on those opportunities. Also, requirements to report possible non-compliances should be eliminated. We strongly support voluntary self-reporting, but not mandatory self-reporting.
<p><b>Response: The DSR SAR DT thanks you for your comment. The team concurs that each requirement should be evaluated for its reliability need, and the team will pass your comment along to the standard drafting team for its consideration in the drafting stage of the standard.</b></p>		
FirstEnergy	Yes	<p>We agree with the scope but would also like to see the following considered:</p> <ol style="list-style-type: none"> <li>1. References to the DOE reporting process in EOP-004 need to be revised. They currently refer to the old EIA form.</li> <li>2. Besides "sabotage", it may be helpful to clearly define "vandalism". It is vaguely written in the standards. Also, the process of "public appeals" for the DOE reportable requirements needs to be more clearly defined.</li> <li>3. Consolidate documents covering reporting requirements. There are currently several documents that require reporting (EOP-004, CIP-001, DOE oe-417, and NERC's Security Guideline for the Electricity Sector: Threat and Incident Reporting). NERC also has the "Bulk Power System Disturbance Classification Scale" that does not completely align with all the reporting requirements. Therefore we recommend keeping this as simple as possible by combining all the reporting requirements into one standard. It would be beneficial to not require operators to have to go to 4 different documents to determine what to report on.</li> </ol>
<p><b>Response: The DSR SAR DT thanks you for your comment.</b></p>		

**Consideration of Comments on Project 2009-01 — SAR for Disturbance and Sabotage Reporting**

Organization	Yes or No	Question 2 Comment
<p><b>The Brief Description of the SAR states:</b> Specific references to the DOE form need to be eliminated.</p> <p><b>The team will pass your comment along to the standard drafting team for its consideration.</b></p> <p><b>The team concurs that this should be considered in drafting the standards. The team will pass your comment along to the standard drafting team for its consideration.</b></p>		
Exelon	Yes	Consolidation of redundant requirements and clarifications of difficult to follow / interpret standards should be a high priority at NERC.
<p><b>Response: The DSR SAR DT thanks you for your comment. One of the FERC directives for CIP-001 is: Explore ways to reduce redundant reporting, including central coordination of sabotage reports and a uniform reporting format.</b></p>		
Electric Market Policy	Yes	
SERC OC Standards Review Group	Yes	
PSEG Enterprise Group Inc Companies	Yes	
IRC Standards Review Committee	Yes	
Pepco Holdings, Inc. - Affiliates	Yes	
Calpine Corporation	Yes	
Covanta	Yes	
Colmac Clarion	Yes	

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Organization	Yes or No	Question 2 Comment
United Illuminating	Yes	
Texas Regional Entity	Yes	
Edward C. Stein	Yes	
WECC	Yes	
Luminant Power	Yes	
ReliabilityFirst Corporation	Yes	
Brazos Electric Power Cooperative, Inc.	Yes	
PacifiCorp	Yes	
Oncor Electric Delivery	Yes	
Illinois Municipal Electric Agency	Yes	
Manitoba Hydro	Yes	
Consumers Energy Company	Yes	

**Consideration of Comments on Project 2009-01 — SAR for Disturbance and Sabotage Reporting**

**3. Are you aware of any associated business practices that we should consider with this SAR? If yes, please explain in the comment area.**

**Summary Consideration:** Stakeholders did not identify any associated business practices for consideration under the SAR. One stakeholder identified a related standard that references multi-site sabotage. The team has included a reference to TOP-005, section 2.9 (Appendix 1) in the SAR under Related Standards. Two stakeholders suggested that Business Practices should not be considered in a standard. The SAR DT notes that standard development projects must not invalidate business practices that are already in place. This question is required to be asked per the Standard Drafting Team Guidelines (page 8) and aids in coordination with North American Energy Standards Board. One stakeholder suggested a “one-stop-shopping” solution. The SAR DT agrees with this approach and will forward this comment to the Standard Drafting Team.

Organization	Yes or No	Question 3 Comment
MRO NERC Standards Review Subcommittee	Yes	
Luminant Power	Yes	The SAR drafting team should include in the SAR scope a review of the NRC sabotage and event reporting requirements to ensure there are no overlapping or conflicting requirements between NERC, FERC, and the NRC. The SAR scope should include a review of the CIP Cyber Security Standards and coordination with the CIP SDT to ensure that cyber sabotage reporting definitions are in concert, and ensure that cyber sabotage reporting requirements are not duplicated in multiple standards.
<p><b>Response:</b> The DSR SAR DT thanks you for your comment. The team notes that your comments relate directly to potential revisions of the standard itself. Part of this SAR is to eliminate redundancies as well. The team will pass your comments along to the Standards Drafting Team for its consideration. This project is designed to address physical asset reporting, not cyber assets. Therefore, cyber assets will not be included in this SAR.</p>		
MidAmerican Energy	Yes	Attachment TOP-005, section 2.9 speaks of “Multi-site sabotage” with no definition. The ES-ISAC 2008 advisory is an associated standard or practice on sabotage. All references to sabotage should be eliminated or retired except for CIP-001.
<p><b>Response:</b> The DSR SAR DT thanks you for your comment. The team has included a reference to TOP-005, section 2.9 (Appendix 1) in the SAR under Related Standards. Project 2009-01 is designed to address physical asset reporting, not cyber asset sabotage and disturbance reporting. The standard drafting team will remove redundancies per the SAR.</p>		

**Consideration of Comments on Project 2009-01 — SAR for Disturbance and Sabotage Reporting**

Organization	Yes or No	Question 3 Comment
Illinois Municipal Electric Agency	Yes	A one-stop reporting tool/site would facilitate efficient reporting and compliance; e.g., further development of the ES-ISAC/CIPIS to include all reportable categories and automatic notification of required parties. A single report form would be best.
<p><b>Response: The DSR SAR DT thanks you for your comment. The team agrees with your suggestion and will pass this along to the Standard Drafting Team for its consideration in developing standards.</b></p>		
AEP	Yes	The current reporting process necessitates multiple reports be sent to multiple parties, which is inefficient and may, inadvertently, result in alignment issues between the separate reports. We would recommend that a single report that combines NERC (CIPIS) and NERC ESISAC information be provided to NERC (CIPIS) that is systematically (programmatically) forwarded to all necessary entities. Further, updates to incidents would also go through NERC with the same electronic processing. Currently, we are not aware of a formal method to report incidents to the FBI, which should be also included in the distribution. The current reporting mechanism to the FBI JTTF is by telephone and the NERC platform described would provide more consistent reporting.
<p><b>Response: The DSR SAR DT thanks you for your comment. The team agrees with your suggestion and will pass this along to the Standard Drafting Team for its consideration in developing standards. This project is designed to address physical asset reporting, not cyber assets.</b></p>		
Progress Energy	Yes	Yes. If this SAR moves forward other practices such as those required by CIP-008 (cyber incident reporting via the OE-417 form) may need to be considered.
<p><b>Response: The DSR SAR DT thanks you for your comment. The SAR states “Specific references to the DOE form need to be eliminated.” This will remove the linkage that you identify between CIP-001 and CIP-008. There is also a directive from FERC Order 693 in the SAR that states: Consider FirstEnergy’s suggestions to differentiate between cyber and physical security sabotage and develop a threshold of materiality. This allows the standard drafting team to delineate physical and cyber assets. The DSR SAR DT also notes that the general layout and sequencing of requirements in CIP-008 might be a good framework for drafting the standard requirements pertaining to sabotage and disturbance reporting of physical assets.</b></p>		
Exelon	No	We are not sure what this question means. Who's Associated Business practices, NERC, Applicable Entities in the Standard, our business practices?
<p><b>Response: The DSR SAR DT thanks you for your comment. “Business practices” refers to any business practice of any stakeholder (e.g. North American Energy Standards Board business practices).</b></p>		

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Organization	Yes or No	Question 3 Comment
SERC OC Standards Review Group	No	Business practices should not be considered in a standard.
<p><b>Response: The DSR SAR DT thanks you for your comment. Standard development projects must not invalidate business practices that are already in place. This question is required to be asked per the Standard Drafting Team Guidelines (page 8) and aids in coordination with North American Energy Standards Board.</b></p>		
FirstEnergy	No	Although we are not aware of any NAESB business practices that need to be reviewed in conjunction with these proposed revisions, the SDT should consider reviewing current RTO procedures and practices that may require the need for variances in the revised standards.
<p><b>Response: The DSR SAR DT thanks you for your comment. The Standard Drafting Team will review any procedures or practices that are identified for potential variances.</b></p>		
Georgia System Operations Corp.	No	Business practices should not be part of a Reliability Standard. Neither should NERC/Region reporting requirements (except for reporting of threats to physical or cyber security). NERC may need to take some action in the case of threats but does not and cannot take any operational action for most of the reporting requirements that are presently in the Requirements section of the Reliability Standards.
<p><b>Response: The DSR SAR DT thanks you for your comment. Standard development projects must not invalidate business practices that are already in place. This question is required to be asked per the Standard Drafting Team Guidelines (page 8) and aids in coordination with North American Energy Standards Board. The team disagrees with your assertion about reporting. Instances of sabotage are often not identified until after the fact, and these should be reported to alert other entities of the sabotage and for “lessons learned”.</b></p>		
PSEG Enterprise Group Inc Companies	No	
Northeast Power Coordinating Council	No	
Kansas City Power & Light	No	
IRC Standards Review Committee	No	

**Consideration of Comments on Project 2009-01 — SAR for Disturbance and Sabotage Reporting**

Organization	Yes or No	Question 3 Comment
Pepco Holdings, Inc. - Affiliates	No	
Electric Market Policy	No	
Bonneville Power Administration	No	
Lands Energy Consulting	No	
Covanta	No	
Colmac Clarion	No	
Cowlitz County PUD	No	
United Illuminating	No	
Reliant Energy	No	
Texas Regional Entity	No	
Edward C. Stein	No	
PacifiCorp	No	
WECC	No	
ERCOT ISO	No	
ReliabilityFirst Corporation	No	

**Consideration of Comments on Project 2009-01 — SAR for Disturbance and Sabotage Reporting**

Organization	Yes or No	Question 3 Comment
Brazos Electric Power Cooperative, Inc.	No	
Oncor Electric Delivery	No	
Consolidated Edison Co. of New York, Inc.	No	
Manitoba Hydro	No	
Duke Energy	No	
We Energies	No	
Consumers Energy Company	No	
NextEra Energy Resources, LLC	No	
Ameren	No	

**Consideration of Comments on Project 2009-01 — SAR for Disturbance and Sabotage Reporting**

**4. CIP-001-1 applies to the Reliability Coordinator, Transmission Operator, Balancing Authority, Generator Operator, and the Load-serving Entity. EOP-004-1 applies to the same entities, plus the Regional Reliability Organization. Do you agree with the applicability of the existing CIP-001-1 and the existing EOP-004-1? If no, please identify what you believe should be modified.**

**Summary Consideration: Many stakeholders had comments regarding applicability of the two standards. The three main concerns were:**

- 1 Regional Reliability Organization applicability: Many commenters do not feel the RRO should be in the standards. The DSR SAR DT concurs and notes that the SAR states that “EOP-004 has some ‘fill-in-the-blank’ components to eliminate”. This will remove the RRO from applicability.
- 2 Load-Serving Entity/Distribution Provider: Many stakeholders do not feel that the standards should be applicable to LSEs, but should apply to Distribution Providers. NERC has recognized, through its Compliance Registry, that there are asset owning LSEs and non-asset owning LSEs. The SAR DT believes that an asset owning LSE may be a Distribution Provider based on the Functional Model v4. The team added DP to the applicability of the standard as the Standard Drafting team may have a need to include them in the standard(s). The applicability of LSE or Distribution Provider will ultimately be determined by the Standard Drafting Team as it develops the requirements through the Standard Development Process.
- 3 Transmission Owner/Generator Owner: Many stakeholders have indicated a need to include the TO as an applicable entity. A couple of those would also include the GO. The SAR DT discussed the addition of both the TO and GO. The team has a concern that there will be duplication of requirements between the TO/TOP and GO/GOP if the TO and GO are added to the SAR. That being said, the team added the TO and GO to the applicability of the SAR so that the Standard Drafting team may consider these entities for applicability. The applicability of requirements will ultimately be determined by the Standard Drafting Team as it develops the requirements through the Standard Development Process.

Organization	Yes or No	Question 4 Comment
SERC OC Standards Review Group	No	The EOP-004-1 standard should not apply to the RRO.
<p><b>Response: The DSR SAR DT thanks you for your comment. The team concurs and notes that the SAR states: EOP-004 has some ‘fill-in-the-blank’ components to eliminate. This will remove the RRO from applicability.</b></p>		
Kansas City Power &	No	Do not agree Load Serving Entities need to continue to be included for sabotage. According the NERC Functional Model,

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Organization	Yes or No	Question 4 Comment
Light		an LSE provides for estimating customer load and provides for the acquisition of transmission and energy to meet customer load demand. An LSE has no real impact on maintaining the reliability of electric network short of their planning function. Unfortunately, an LSE needs to be included for disturbance reporting to the DOE under certain conditions for loss of customer load. This may be a reason to maintain a separation of CIP-001 and EOP-004 so as not to unnecessarily include an LSE when it is not needed.
<p><b>Response: The DSR SAR DT thanks you for your comment. NERC has recognized, through its Compliance Registry, that there are asset owning LSEs and non-asset owning LSEs. The SAR DT believes that an asset owning LSE may be a Distribution Provider based on the Functional Model v4. The team added DP to the applicability of the standard as the Standard Drafting team may have a need to include them in the standard(s). The applicability of LSE or Distribution Provider will ultimately be determined by the Standard Drafting Team as it develops the requirements through the standard drafting stage of the process. The team will pass your comment along to the Standard Drafting Team for its consideration.</b></p>		
IRC Standards Review Committee	No	We agree with the applicability of CIP-001-1 but question the need to include the RRO in EOP-004-1. Requirement R1 of EOP-004-1 can be turned into an industry developed and approved procedural requirement with details included in an appendix; whereas R5 can be changed to a requirement for the responsible entities to act on recommendations and to self-report compliance. Tracking and reviewing status of recommendation do not need to be performed by the RRO, or any entity for that matter, if a self-reporting mechanism is developed.
<p><b>Response: The DSR SAR DT thanks you for your comment. The team concurs and notes that the SAR states: EOP-004 has some ‘fill-in-the-blank’ components to eliminate. This will remove the RRO from applicability.</b></p>		
Pepco Holdings, Inc. - Affiliates	No	As specified in Order 693, Regional Reliability Organizations are not to be assigned applicability. The revised standard(s) should contain the reporting form either directly or by reference and the RRO should be removed. The other EOP-004 requirements for RROs are now considered normal monitoring activities of the Regional Entities.
<p><b>Response: The DSR SAR DT thanks you for your comment. The team concurs and notes that the SAR states: EOP-004 has some ‘fill-in-the-blank’ components to eliminate. This will remove the RRO from applicability.</b></p>		
FirstEnergy	No	The Regional Reliability Organization should be removed from the applicability of EOP-004-1. Any report they receive would be from the other entities listed. For consistency, the entities should report to the appropriate law enforcement agency. A report to the Reliability Entity should also be made for that entities information only.
<p><b>Response: The DSR SAR DT thanks you for your comment. The team concurs and notes that the SAR states: EOP-004 has some ‘fill-in-the-blank’ components to eliminate. This will remove the RRO from applicability.</b></p>		
Electric Market Policy	No	Applicability should not apply to LSE unless they have physical assets. If they do not have such assets, they are unable to

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Organization	Yes or No	Question 4 Comment
		<p>determine how many customers are out, how much load was lost or the duration of an outage. We continue to question the need for the LSE entity in reliability standards. End use customer load is either connected to transmission or distribution facilities. So, the applicable planner has to plan for that load when designing its facilities or the load will not have reliable service. To the extent that energy and capacity for that load is supplied by an entity other than the TO or DP, the TO or DP should have interconnection requirements that compel the supplier to provide any and all data necessary to meet the requirements of reliability standards.</p>
<p><b>Response: The DSR SAR DT thanks you for your comment. NERC has recognized, through its Compliance Registry, that there are asset owning LSEs and non-asset owning LSEs. The SAR DT believes that an asset owning LSE may be a Distribution Provider based on the Functional Model v4. The team has added DP to the applicability of the standard as the Standard Drafting team may have a need to include them in the standard(s). The applicability of LSE or Distribution Provider will ultimately be determined by the Standard Drafting Team as it develops the requirements in the standard drafting stage of the process. The team will pass your comment along to the Standard Drafting Team for its consideration.</b></p>		
MRO NERC Standards Review Subcommittee	No	As FERC has directed, the RRO should be removed since they are not owners or operators of the BES.
<p><b>Response: The DSR SAR DT thanks you for your comment. The team concurs and notes that the SAR states: EOP-004 has some 'fill-in-the-blank' components to eliminate. This will remove the RRO from applicability.</b></p>		
Lands Energy Consulting	No	<p>CIP-001-1 - Yes. In many cases, the staff of an LSE embedded in another entity's BA/TOP area is more likely to discover an act of sabotage directed toward a BA/TOP-owned facility that could affect the BES than the asset owner. This is because the LSE likely has more operating staff in the area. I have included a requirement in my clients' Sabotage Identification and Reporting Procedures that the client treat acts of sabotage to a third party's system discovered by client employees as though the act was directed toward client facilities. EOP-004-1 - As mentioned before, I would eliminate the LSE from the applicability list and leave the responsibility for disturbance reporting and response to the TOP/BA. However, I would retain a responsibility for the LSEs to cooperate (when requested) with any disturbance investigation.</p>
<p><b>Response: The DSR SAR DT thanks you for your comment. NERC has recognized, through its Compliance Registry, that there are asset owning LSEs and non-asset owning LSEs. The SAR DT believes that an asset owning LSE may be a Distribution Provider based on the Functional Model v4. The team has added DP to the applicability of the standard as the Standard Drafting team may have a need to include them in the standard(s). The applicability of LSE or Distribution Provider will ultimately be determined by the Standard Drafting Team as it develops the requirements in the standard drafting stage of the process. The team will pass your comment along to the Standard Drafting Team for its consideration.</b></p>		
Calpine Corporation	No	<p>The reporting requirements of EOP - 004 are needed for the RC, BA, LSE and the GOP that operates or controls generation in a system as defined by NERC. (System - A combination of generation, transmission, and distribution components). A disturbance is described as an unplanned event that produces and abnormal system condition, any</p>

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Organization	Yes or No	Question 4 Comment
		<p>perturbation to the electric system, and the unexpected change in ACE that is caused by the sudden failure of generation or interruption of load. The GOP operating/controlling generation within a system has the ability to analyze system conditions to determine if reporting is necessary. A NERC registered GOP that is a merchant generator within another company's system does not have the ability for a wide area view and cannot analyze system conditions beyond the interconnection point of the facility. Moreover, in most cases the reporting requirements outlined in the Interconnection Reliability Operating Limits and Preliminary Disturbance Report do not apply to the merchant generator that is not a generation only BA. The applicability of the standard does encompass the true merchant generation entities required to register as GOP. Similarly, the OE-417 table 1 reporting requirements generally do not apply to a true merchant generating entity that is required to register as a GOP.</p>
<p><b>Response: The DSR SAR DT thanks you for your comment. The team agrees that generators may not have a wide area view and the capability to analyze events. The final wording of the requirements developed by the Standard Drafting Team will determine the applicability. The team will pass your comment on to the Standards Drafting Team for its consideration. The SAR calls for the removal of references to the DOE form OE-417.</b></p>		
Cowlitz County PUD	No	Replace LSE with DP, and the Regional Reliability Organization with the Regional Entity.
<p><b>Response: The DSR SAR DT thanks you for your comment. The team has added DP to the applicability of the SAR. The SAR calls for removing the fill-in-the-blank standard elements which will remove the RRO.</b></p>		
United Illuminating	No	Add Distribution Provider
<p><b>Response: The DSR SAR DT thanks you for your comment. The team has added DP to the applicability of the SAR.</b></p>		
Reliant Energy	No	EOOP-004-1 should exclude the generator operator from disturbance reporting except providing the system operator or reliability coordinator with appropriate unit operation information upon request. Acts of sabotage should be identified clearly and reported to the indicated authorities.
<p><b>Response: The DSR SAR DT thanks you for your comment. Other commenters have questioned the ability of Generator Operators to have a wide area view and to be able to analyze disturbances on the system. The team agrees that generators may not have a wide area view and the capability to analyze system events. The final wording of the requirements (i.e. reporting vs. data provision) developed by the Standard Drafting Team will determine the applicability to GOPs. The team will pass your comment on to the Standards Drafting Team for its consideration.</b></p>		
Texas Regional Entity	No	Add GO and TO to the list of applicability. The intent of CIP-001-1 when it was first written was to have the proper and most likely entities associated directly with operations to be the ones to begin the reporting process in the case of sabotage on the system. In the ERCOT Region and other regions in the US, the GOP may not be physically located at the site. The GOP is often removed from the minute-by-minute responsibilities of plant operations and, therefore, may be less

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Organization	Yes or No	Question 4 Comment
		<p>able to react to physical sabotage at the location/plant/facility in a timely manner. The concern is that, in the case of an actual sabotage event, the failure to report to the appropriate authorities in a timely manner may jeopardize the reliability of the BPS. Therefore, the Generator Owner (GO) should be added to the list of applicability for CIP-001-1, because it is the GO that is more likely to be on location at the generation site and thus aware of sabotage when it first occurs. This would disallow for any possible communication gap and put responsibility on all of the appropriate entities to report such an event. Additionally, and for the same reasons as adding the GO, the Transmission Owner (TO) should also be added to the list of applicability for reporting sabotage on its facilities.</p>
<p><b>Response:</b> The DSR SAR DT thanks you for your comment. The SAR DT discussed the addition of the TO and GO. The team was concerned that there may be duplication of requirements between the TO/TOP and GO/GOP if the TO and GO are added to the SAR. That being said, the team added the TO and GO to the applicability of the SAR so that the Standard Drafting team may consider these entities for applicability. The applicability of requirements will ultimately be determined by the Standard Drafting Team as it develops the requirements through the standard drafting Process. The team will pass your comment along to the Standard Drafting Team for its consideration concerning applicability.</p>		
NextEra Energy Resources, LLC	No	<p>The scope of the proposed SAR should not include the Generator Operator.</p>
<p><b>Response:</b> The DSR SAR DT thanks you for your comment. Other commenters have questioned the ability of Generator Operators to have a wide area view and to be able to analyze disturbances on the system. The team agrees that generators may not have a wide area view and the capability to analyze system events. The final wording of the requirements (i.e. reporting vs. data provision) developed by the Standard Drafting Team will determine the applicability to GOPs. The team will pass your comment on to the Standards Drafting Team for its consideration.</p>		
Exelon	No	<p>CIP-001, remove LSE's from the standard for the reasons identified in the FERC LSE order. Ad TO and DP. EOP-004, remove LSE's from the standard for the reasons identified in the FERC LSE order. Remove RRO's, they are not a user, owner, operator of the BES. Add DP or TO. Consider conditional applicability as in the UFLS standards, " the TO or DP who performs the functions specified in the standard..."</p>
<p><b>Response:</b> The DSR SAR DT thanks you for your comment. NERC has recognized, through its Compliance Registry, that there are asset owning LSEs and non-asset owning LSEs. The SAR DT believes that an asset owning LSE may be a Distribution Provider based on the Functional Model v4. The team has added DP to the applicability of the SAR. The applicability of LSE or Distribution Provider will ultimately be determined by the Standard Drafting Team as it develops the requirements in the standard drafting stage of the process. The SAR DT discussed the addition of the TO. The team is concerned that there may be duplication of requirements between the TO/TOP if the TO is added to the SAR. That being said, the team added the TO and GO to the applicability of the SAR so that the Standard Drafting team may consider these entities for applicability. The applicability of requirements will ultimately be determined by the Standard Drafting Team as it develops the requirements through the standard drafting Process. The SAR calls for elimination of fill in the blanks elements, which will remove the RRO from the standard. The team will pass your comment along to the Standard Drafting Team for its consideration concerning conditional applicability.</p>		

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Organization	Yes or No	Question 4 Comment
ERCOT ISO	No	The Regional Reliability Organization is not a registered Functional Entity in the NERC registry. The applicability must be revised to more appropriately assign the requirements to registered functional entities. Also, the industry needs to recognize that there are other resources than generation for which the operators need to be included. Perhaps a demand-side resource should have a resource operator. This particular SAR may not be the appropriate venue for this, but control of resources which can be used to mitigate sabotage events or disturbance events may need to be addressed.
<p><b>Response: The DSR SAR DT thanks you for your comment. The SAR calls for elimination of fill-in-the-blank elements, which will remove the RRO from the standard. The applicability of requirements will ultimately be determined by the Standard Drafting Team as it develops the requirements in the standard drafting stage of the process. The team will pass your comment along to the Standard Drafting Team for its consideration concerning conditional applicability. This SAR is for reporting rather than control actions as you mention.</b></p>		
Brazos Electric Power Cooperative, Inc.	No	May need to consider adding Transmission Owner. I don't see a need for the RRO to be included as they are not owner/operators of grid facilities.
<p><b>Response: The DSR SAR DT thanks you for your comment. The SAR DT discussed the addition of the TO. The team is concerned that there may be duplication of requirements between the TO/TOP if the TO is added to the SAR. That being said, the TO has been added to the applicability of the SAR so that the Standard Drafting team may consider these entities for applicability. The applicability of requirements will ultimately be determined by the Standard Drafting Team as it develops the requirements in the standard drafting stage of the process. The SAR calls for elimination of fill in the blank elements, which will remove the RRO from the standard. The team will pass your comment along to the Standard Drafting Team for its consideration concerning conditional applicability.</b></p>		
PacifiCorp	No	LSE's don't generally own/operate facilities/systems that would experience a logical or physical sabotage event.
<p><b>Response: The DSR SAR DT thanks you for your comment. NERC has recognized, through its Compliance Registry, that there are asset owning LSEs and non-asset owning LSEs. The SAR DT believes that an asset owning LSE may be a Distribution Provider based on the Functional Model v4. The team has added DP to the applicability of the SAR. The applicability of LSE or Distribution Provider will ultimately be determined by the Standard Drafting Team as it develops the requirements in the standard drafting stage of the process.</b></p>		
MidAmerican Energy	No	MidAmerican Energy believes the requirement for the Regional Reliability Organization should be removed from EOP-004-1 since the RRO is a holdover from making the standards enforceable. It is no longer appropriate for the regions to be named as responsible entities within the standards.
<p><b>Response: The DSR SAR DT thanks you for your comment. The SAR calls for elimination of fill-in-the-blank elements, which will remove the RRO from the standard.</b></p>		

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Organization	Yes or No	Question 4 Comment
Georgia System Operations Corp.	No	EOP-004 should be retired. CIP-001 should not apply to LSEs other than those that are retail marketers.
<p><b>Response:</b> The DSR SAR DT thanks you for your comment. The SAR calls for EOP-004 to be revised. The Standard Drafting Team may, with stakeholder approval, retire it. CIP-001: NERC has recognized, through its Compliance Registry, that there are asset owning LSEs and non-asset owning LSEs. The SAR DT believes that an asset owning LSE may be a Distribution Provider based on the Functional Model v4. The team has added DP to the applicability of the SAR. The applicability of LSE or Distribution Provider will ultimately be determined by the Standard Drafting Team as it develops the requirements in the standard drafting process.</p>		
AEP	No	We would recommend that the Load Serving Entity (LSE) be removed from both standards, and that the Generator Owner and Transmission Owner be added to the resulting standard.
<p><b>Response:</b> The DSR SAR DT thanks you for your comment. NERC has recognized, through its Compliance Registry, that there are asset owning LSEs and non-asset owning LSEs. The SAR DT believes that an asset owning LSE may be a Distribution Provider based on the Functional Model v4. The team has added DP to the applicability of the SAR. The applicability of LSE or Distribution Provider will ultimately be determined by the Standard Drafting Team as it develops the requirements in the standard drafting stage of the process. The SAR DT discussed the addition of the TO and GO. The team has a concern that there may be duplication of requirements between the TO/TOP and GO/GOP if the TO and GO are added to the SAR. That being said, the team added the TO and GO to the applicability of the SAR so that the Standard Drafting team may consider these entities for applicability. The applicability of requirements will ultimately be determined by the Standard Drafting Team as it develops the requirements through the standard drafting Process. The team will pass your comment along to the Standard Drafting Team for its consideration concerning applicability.</p>		
Duke Energy	No	It's unclear to us that the RRO should continue to be an applicable entity.
<p><b>Response:</b> The DSR SAR DT thanks you for your comment. The team concurs and notes that the SAR states: EOP-004 has some 'fill-in-the-blank' components to eliminate. This will remove the RRO from applicability.</p>		
Covanta	Yes	It would be a welcome enhancement to the end users to understand to communication link between all "appropriate parties" who shall be notified of potential or actual sabotage events.... which also needs to be defined.
<p><b>Response:</b> The DSR SAR DT thanks you for your comment. The team concurs, and will pass this comment on to the standard drafting team for its consideration.</p>		
Edward C. Stein	Yes	
WECC	Yes	

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Organization	Yes or No	Question 4 Comment
Luminant Power	Yes	
ReliabilityFirst Corporation	Yes	
Oncor Electric Delivery	Yes	
Consolidated Edison Co. of New York, Inc.	Yes	
Illinois Municipal Electric Agency	Yes	
Manitoba Hydro	Yes	
We Energies	Yes	
Consumers Energy Company	Yes	
PSEG Enterprise Group Inc Companies	Yes	
Northeast Power Coordinating Council	Yes	
Bonneville Power Administration	Yes	
Colmac Clarion	Yes	
Progress Energy	Yes	
Ameren	Yes	

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**5. If you have any other comments on the SAR or proposed modifications to CIP-001-1 and EOP-004-1 that you haven't provided in response to the previous questions, please provide them here.**

**Summary Consideration:** Stakeholders provided many good comments that should be considered in the development of the standards under this project. The SAR DT does not believe that these require any revisions to the SAR and will forward these comments to the Standard Drafting Team for its consideration in developing the standard(s). These include:

- 1 Consolidation of reports: The SAR DT agrees with this concept and will forward the comment to the Standard Drafting Team for its consideration.
- 2 Concerns about pre-determination of combining CIP-001 and EOP-004 into one standard: The SAR states: CIP-001 *may* be merged with EOP-004 to eliminate redundancies. The two standards may be left separate.
- 3 Reporting criteria in multiple tables: The team agrees that it would be easier if there were only one table. Part of this SAR is to eliminate redundancies and make general improvements to the standard. The team also agrees that the requirements developed should be clear in their reliability objective.

Organization	Question 5 Comment
PSEG Enterprise Group Inc Companies	<p>The PSEG Companies ask that the drafting team allow sufficient flexibility for sabotage recognition and reporting requirements such that nothing precludes utilizing a single corporate-wide program for both bulk electric system assets and other businesses. PSEG's Sabotage Recognition, Response and Reporting Program is directed to all business areas which are directed to follow the same internal protocol that also satisfies the NERC Standards requirements. For example, for gas assets, PSEG's gas distribution business follows the PSEG corporate-wide program for sabotage recognition and response. PSEG agrees that some modifications should be made to CIP-001 (ex. better define or give examples of sabotage) and EOP-004 to make them clearer? If they are merged, then Sabotage will not be in the title (or the primary focus) because several of the Disturbances that reporting is required for in EOP-004 have nothing to do with sabotage. EOP-004 has criteria listed in 4 places to determine when to send a report:</p> <ul style="list-style-type: none"> <li>o Criteria listed in EOP-004 Attachment 1</li> <li>o Criteria listed in EOP-004 Attachment 2</li> <li>o Criteria listed in top portion of Table 1-EOP-004</li> <li>o Criteria listed in bottom portion of Table 1-EOP-004</li> </ul> <p>Therefore, it would be much easier if there was one table of criteria for reference that addressed all of the reportable conditions and all of the applicable reports. If the 2 standards are merged as suggested in the SAR, any differences in the reporting obligation for actual or attempted sabotage and reporting of disturbances must be clear.</p>

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Organization	Question 5 Comment
	<p><b>Response: The DSR SAR DT thanks you for your comment. The team agrees that it would be easier if there were only one table. Part of this project is to eliminate redundancies and make general improvements to the standard. The team also agrees that the requirements developed should be clear in their reliability objective. The team will forward your comment to the standard drafting team for its consideration in the drafting of the standard.</b></p>
Kansas City Power & Light	<p>If it is desirable to keep CIP-001 and EOP-004 separate, it is recommended the SDT consider adding a reference in CIP-001 to the DOE reporting form either by name or by internet link in the standard.</p>
	<p><b>Response: The DSR SAR DT thanks you for your comment. The SAR SDT recommends eliminating all references to the DOE report, so there won't be a reference to it in CIP-001.</b></p>
IRC Standards Review Committee	<p>We suggest that the revision not be conducted with a preconceived notion that the two standards must be combined since there are some differences between sabotage and emergency system conditions, and in the communication and reporting processes and channels. We suggest the SDT start off with a neutral position to focus on improving the standards, then assess the pros and cons of merging the two based on technical merit only.</p>
	<p><b>Response: The DSR SAR DT thanks you for your comment. The SAR states: CIP-001 may be merged with EOP-004 to eliminate redundancies. The two standards may be left separate.</b></p>
Pepco Holdings, Inc. - Affiliates	<p>Consider CIP-008-2 as potentially having overlaps with the proposed standard</p>
	<p><b>Response: The DSR SAR DT thanks you for your comment. The SAR states "Specific references to the DOE form need to be eliminated." This will remove the linkage that you identify between CIP-001 and CIP-008. There is also a directive from FERC Order 693 in the SAR that states:</b></p> <p><b>Consider FirstEnergy's suggestions to differentiate between cyber and physical security sabotage and develop a threshold of materiality. This allows the standard drafting team to delineate physical and cyber assets. The DSR SAR DT also notes that CIP-008 might be a good framework for drafting the standard requirements pertaining to sabotage and disturbance reporting of physical assets.</b></p>
FirstEnergy	<ol style="list-style-type: none"> <li>1. Under Industry Need it states: "The existing requirements need to be revised to be more specific and there needs to be more clarity in what sabotage looks like." The use of the phrase "more specific" should be qualified by adding "while not being too prescriptive". As with other reliability standards, we do not want a standard that causes unwarranted and unnecessary additional work and costs to an entity to comply.</li> <li>2. As pointed out by the NERC Audit and Observation Team in the "Issues to be considered" for CIP-001, clarification is needed regarding contacting the FBI. Prior audits dwelled heavily on FBI notification. For example, our policy states that Corporate Security notifies the FBI. In recent events it appears that local law enforcement handles day to day activities. The notification process for</li> </ol>

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Organization	Question 5 Comment
	<p>contacting the FBI needs clarification along with specific instances in which to call them. Who should make the call to the FBI? It appears that a protocol needs to be developed to clarify what events require notifying the FBI. It could be as simple as after an incident a standard form is completed and forwarded to the FBI, letting them decide if follow up is needed.</p> <p>3. We suggest aligning all reporting requirements for consistency. The items requiring reporting and the timelines to report are very inconsistent between NERC and the DOE. NERC's timelines are also not consistent with their own Security Guideline for the Electricity Sector: Threat and Incident Reporting.</p>
<p><b>Response: The DSR SAR DT thanks you for your comment.</b></p> <p>The team concurs that the standards should provide the “what” without the “how”. The standard drafting team will develop the standards using the NERC Standard Development Process that includes stakeholder consensus. The team does not feel it is necessary to add the “not too prescriptive” qualifier to the SAR.</p> <p>The team will forward this comment to the standard drafting team for its consideration in developing the standard(s).</p> <p>The team concurs with your comment and notes that other commenters have suggested “one stop shopping” reporting for disturbances and sabotage. The team will forward this comment to the standard drafting team for its consideration in developing the standard(s).</p>	
Electric Market Policy	CIP-008-1 Incident Reporting and Response Planning include some requirements that require coordination with the requirements addressed in this project.
<p><b>Response: The DSR SAR DT thanks you for your comment. The SAR states “Specific references to the DOE form need to be eliminated.” This will remove the linkage that you identify between CIP-001 and CIP-008. There is also a directive from FERC Order 693 in the SAR that states:</b></p> <p><b>Consider FirstEnergy’s suggestions to differentiate between cyber and physical security sabotage and develop a threshold of materiality.</b></p> <p><b>This allows the standard drafting team to delineate physical and cyber assets. The DSR SAR DT also notes that CIP-008 might be a good framework for drafting the standard requirements pertaining to sabotage and disturbance reporting of physical assets.</b></p>	
MRO NERC Standards Review Subcommittee	<p>A. The SAR states that there may be impact on a related standard, COM-003-1 (page SAR-5). Is the SDT referring to Project 2007-02, Operating Personnel Communication Protocols? If so, this is a SAR too and should not be used as a reference.</p> <p>B. CIP-001-1 and EOP-004-1 should be combined into one EOP Standard.</p> <p>C. Within EOP-004-1 there is industry confusion on what form to submit in the event of an event. There should only be one form for the new combination Standard eliminating the need for reporting form attachments. It should be the DOE Form, OE-417. Although it is beyond the scope of this SAR, it would greatly benefit industry if there was a central location on the NERC website containing ALL reporting forms, including FERC, NERC, DOE, and ESIAC. This would enable the System Operators to efficiently locate the most current version of the appropriate form in order to report events.</p>

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Organization	Question 5 Comment
	<p>D. The word Disturbance is primarily used in other Standards as in, Disturbance Control Standard or system separation due to a disturbance. Should the NERC definition be updated? Should the word "Sabotage" be defined by NERC? Additionally, we recommend that one definition of "Sabotage" be utilized industry-wide, instead of varying definitions by multiple groups like the DOE, ESIAC, etc.</p>
<p><b>Response: The DSR SAR DT thanks you for your comment.</b></p> <p><b>A. It does reference project 2007-02, and it has been noted in the SAR.</b></p> <p><b>B. Will forward this comment to the standard drafting team for its consideration in developing the standard(s).</b></p> <p><b>C. The team concurs with your comment and notes that other commenters have suggested "one stop shopping" reporting for disturbances and sabotage. The team will forward this comment to the standard drafting team for its consideration in developing the standard(s).</b></p> <p><b>D. References to DOE are to be removed from the standards per the SAR. FERC Order 693 directives include definition of sabotage for CIP-001.</b></p>	
Lands Energy Consulting	<p>One final comment on CIP-001-1. My clients received universally rude treatment from the FBI field offices when they attempted to establish the contacts required by the Standard. If the FBI doesn't see value in establishing these contacts, remove the requirement from the Standard. Making sure the LSE knows the FBI field office phone number is probably all the Standard should require.</p>
<p><b>Response: The DSR SAR DT thanks you for your comment. The team will forward this comment to the standard drafting team for its consideration in developing the standard(s).</b></p>	
Colmac Clarion	<p>Need single report for Sabotage so whatever is required results in notification of all parties (State Emergency Management, Homeland Security, FBI, Grid Reliability Chain of Command). Any and all of these can 'expand' knowledge later but all seem to require 'instant' notification.</p>
<p><b>Response: The DSR SAR DT thanks you for your comment. The team concur with your comment and notes that other commenters have suggested "one stop shopping" reporting for disturbances and sabotage. The team will forward this comment to the standard drafting team for its consideration in developing the standard(s).</b></p>	
Cowlitz County PUD	<p>Local Law enforcement agencies often are not friendly to Federal involvement with smaller problems they consider their "turf." Need to make sure the small stuff stays with them, however have a system of internal reporting that will catch coordinated sabotage efforts (multiple attacks on DPs and small BAs) at the RC or RE level who then can report to the Federal agencies. Currently EOP-004-1 requires small entities to report a "disturbance" if half of their firm customer load is lost. For some entities, this can be one small substation going down due to a bird. The "50% of total demand" requirement should be removed or improved to better define a true BPS disturbance.</p>

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Organization	Question 5 Comment
<p><b>Response: The DSR SAR DT thanks you for your comment. The team will forward this comment to the standard drafting team for its consideration in developing the standard(s).</b></p>	
Exelon	<p>Exelon agrees this is a worthwhile project and that reliability will be enhanced and the compliance process will be simplified by clarifying terminology and reporting requirements in these standards. If nothing else, defining "Sabotage" so as to end interpretations of this term and the related requirements is necessary.</p>
<p><b>Response: The DSR SAR DT thanks you for your comment.</b></p>	
ERCOT ISO	<p>Due to the fact that both the CIP-001-1 and EOP-004-1 have similar reporting standards, initially combining the two sounds like a correct analysis. However, after further consideration and due to the critical nature of its intended function involving Security aspects, the CIP-001 should be intensely evaluated to determine if its intended purpose meets the threshold or criteria to stand alone. The existing standards for CIP-001-1 Sabotage Reporting may help prevent future mitigation actions caused by sabotage events. EOP-004-1 Disturbance Reporting is administrative in nature, thus the jeopardy of the Bulk Electric System reliability is impacted only if analysis is not performed or if corrective follow-up actions are not implemented. Combining EOP-004 Standard requirements under the umbrella of the CIP -001 Standard would create a high profile Disturbance Reporting Standard. The industry would be better served if information defining sabotage was provided as well as a technical reference document on recognizing sabotage that would also clarify or state any personnel training requirements. All aspects of the intended functions must be reviewed before merging the two standards. At a minimum, we must consider modification that provides improved understanding of the reporting standards and implications as they are currently written.</p>
<p><b>Response: The DSR SAR DT thanks you for your comment. The SAR states: CIP-001 <i>may</i> be merged with EOP-004 to eliminate redundancies. The two standards may be left separate. One of the FERC Order 693 directives for CIP-001 states:</b></p> <p><b>Define “sabotage” and provide guidance on triggering events that would cause an entity to report an event.</b></p> <p><b>The Standard Drafting Team will follow the NERC Standard Development Process in making revisions under this SAR, including a thorough review of the requirements of both standards. The team will forward this comment to the standard drafting team for its consideration in developing the standard(s).</b></p>	
MidAmerican Energy	<p>Conflicting time frames exist from document updates. Reporting should be consolidated to one form and / or site to minimize conflicts, confusion, and errors. 1) Reporting requirements for the outage of 50,000 or more customers in EOP-004-1 requires a report to be made within one hour while the form OE-417 requires a report be made within six hours of the outage. The six hour reference on the updated OE-417 form is the correct reference. 2) Reporting for either CIP-001 or EOP-004 should center on the DOE Form OE-417. This would eliminate confusion and simplify reporting for system operators thereby directly enhancing reliability during system events. This would also eliminate much of the duplicate material and attachments in EOP-004. 3) Although it is beyond the scope of this SAR, the industry would benefit if there was a central location or link on the NERC website containing all</p>

Consideration of Comments on Project 2009-01 — SAR for Disturbance and Sabotage Reporting

Organization	Question 5 Comment
	reporting forms, including FERC, NERC, DOE, and ESIAC. This would enable System Operators to more efficiently locate and report events.
<p><b>Response: The DSR SAR DT thanks you for your comment. The team notes that other commenters have suggested “one stop shopping” reporting for disturbances and sabotage. The team concurs that timeframes for similar reports should be the same. The team will forward this comment to the standard drafting team for its consideration in developing the standard(s).</b></p>	
Georgia System Operations Corp.	Entity reporting to NERC/Regions is needed by NERC and the Regions to accomplish their missions of overseeing the reliability of the BES and enforcing compliance with Reliability Standards. An entity not reporting as quickly as possible does not harm the integrity of the Interconnection. In fact, it increases the risk to the BES to be investigating details and filling out forms during a time when attention should be on correcting or mitigating an incident.
<p><b>Response: The DSR SAR DT thanks you for your comment. The team agrees that non-reporting, in the administrative sense, may not harm the integrity of the Interconnection. The team suggests that the appropriate avenue for addressing this concern is through the development of Violation Risk Factors and Violation Severity Levels for each requirement. These compliance elements will be developed during the standard drafting stage of the development process.</b></p>	
Illinois Municipal Electric Agency	IMEA recommends the following considerations: Simplification of reportable events and the reporting process should be the overriding objective. NERC's Security Guideline for the Electricity Sector: Threat and Incident Reporting (Version 2.0) should be updated to support this standards development initiative. At some point in the process, it may help if examples are given of events actually reported that did not need to be reported.
<p><b>Response: The DSR SAR DT thanks you for your comment. The team notes that other commenters have suggested “one stop shopping” reporting for disturbances and sabotage. The team agrees that NERC’s Security Guide should be in sync with the standards. The team will forward this comment to the standard drafting team for its consideration in developing the standard(s). One of the FERC Order 693 directives for CIP-001 states:</b></p> <p><b>Define “sabotage” and provide guidance on triggering events that would cause an entity to report an event.</b></p> <p><b>Events that were reported, but didn’t need to be, may be identified in “lessons learned”.</b></p>	
WECC	No
Luminant Power	None
Oncor Electric Delivery	No Additional Comments

**Consideration of Comments on Project 2009-01 — SAR for Disturbance and Sabotage Reporting**

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Organization	Question 5 Comment
NextEra Energy Resources, LLC	No comment.
Ameren	None