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Name (26 Responses)
Organization (26 Responses)
Group Name (15 Responses)
Contact Organization (15 Responses)
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Question 7 (0 Responses)
Question 7 Comments (41 Responses)

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	Group
	Exelon
	Exelon Transmission Strategy & Compliance
	Yes
	No
	Some of the DOE related reporting is driven by distribution events, i.e. outages greater than 50,000 customers, is it realistic to expect the RC, whose focus is on the transmission system to perform distribution related reporting?
	Yes
	Yes
	No
	We agree with the direction to identify impact events examples that would trigger reporting and not be limited to sabotage reporting only. It is important to note that when an incident occurs, some level of investigation is required before a determination can be made as to the event is sabotage or not. The focus should be on reporting events when they occur and allow follow-up investigations to make the sabotage determination. That being said, care must be taken in the development of any list of impact events so that it doesn't become or is misinterpreted to be a definitive list. Therefore if it is not on the list, it is not reportable.
	At the 2010 RFC Spring Workshop the following disturbance reporting Criteria was rolled out: All events that are required to be reported by the OE-417 and EOP-004 criteria will use those published procedures. For other events that do not meet the OE-417 and EOP-004 reporting criteria, ReliabilityFirst expects to receive notification of any events involving a sustained outage of multiple BES facilities (buses, lines, generators, and/or transformers, etc.) that are in close proximity (electrically) to one another and occur in a short time frame (such as a few minutes).
	You should consider providing clear and concise instructions as to the expectation on submitting forms, i.e. the DOE 417. There should be no guessing as to when and how reports should be submitted and who should receive them. Specific details on reporting criteria should be included.
	Individual
	Steve Fisher
	Lands Energy Consulting
	No
	My firm provides compliance consulting services to a number of smaller (50-700 MW peak load) LSE/DP registered entities. EOP-004 creates an obligation for LSEs to report "disturbances" that affect their systems. A few of the smaller of these systems receive service from Bonneville-owned transmission lines that serve only 4-6 substations. The NERC Form establishes loss of 50% of the LSE's retail customers as a reportable disturbances. One of my clients receives service from BPA at 5 substations. A single industrial customer with a substantially dedicated

	<p>substation comprises 90% of the utility's MWH load. Were it not for this customer, the utility would have been well below the registration requirement for a DP/LSE. The balance of the load, about 15 MW of peak and 4000 retail customers, is served from 5 substations. Four of these substations serving 3000 customers are served from a long Bonneville 115 kV BES transmission line that runs through a heavily treed right of way. Every time this single line experiences a permanent outage (which will happen a few times a year), the utility loses less than 10 MW of load, but 75% of its retail customers. Under the disturbance reporting criteria, this outage would constitute a reportable disturbance for the utility. When the NERC disturbance reporting criteria were adopted, I doubt that anyone conceived that they would apply to cases like I just described. Reporting trivial events like I've just described constitutes a nuisance to the entity making the report and NERC/WECC for having to process the report. The outage has no earthly effect on the reliability of the BES and certainly doesn't warrant preparation of any kind of disturbance report.</p>
	<p>Yes</p>
	<p>I would give the RC the authority to establish impact thresholds for reporting. Consistent with my earlier comment, I would set the materiality threshold for disturbance reporting purposes at LSEs (or a combination of LSEs in the case of BPA) serving at least 90,000 customers.</p>
	<p>Yes</p>
	<p>I think that the impact approach makes sense and that EOP-004 and CIP-001 are logically connected. Many entities of which I am aware link Sabotage Reporting Training to Disturbance Reporting obligation awareness already.</p>
	<p>Yes</p>
	<p>Less paperwork and fewer requirements to keep in mind during what may be once in a lifetime events are always good.</p>
	<p>No</p>
	<p>The level of complexity described will overwhelm the 20-200 employee utilities that have yet to see - and will never see - the kind of sabotage event that scares the Department of Homeland Security.</p>
	<p>I believe WECC sets its loss of load criteria for disturbance reporting at 200 MW rather than the 300 MW in the NERC reporting form.</p>
	<p>The lack of common sense that leads to a 15 MW loss of load resulting from a 115 kV line outage being catagorized as a "reportable disturbance" really hurts the credibility of the entire NERC Compliance Program. The smaller utilities look at application of EOP-004 in particular to their operation and conclude that either the EO/RRO is: a. stupid; or b. Out to persecute the smaller utilities. In reality, EOP-004 was drafted for application to Southern California Edison, where loss of 50% of customers would be 2-3 million customers. Now that's really disturbing!</p>
	<p>Individual</p>
	<p>David Kahly</p>
	<p>Kootenai Electric Cooperative</p>
	
	
	
	
	<p>No</p>
	<p>Impact events seems to add another layer of uncertainty to the reporting. Define a transmission line. Our transmission lines have very little impact on the grid. It is possible for our lines to cause a local area outage on our transmission provider - but neither is of national security interest or even regional interest. There is no power flow going on across the lines other than local power delivery supply. It seems you run more risk of losing the important reports in the snow of reporting - similar to what we have to avoid on our SCADA systems for our operators to see the key information.</p>
	
	
	<p>Group</p>
	<p>Northeast Power Coordinating Council</p>
	<p>Northeast Power Coordinating Council</p>
	<p>Yes</p>
	<p>In considering guidance found in the document "NERC Guideline: Threat and Incident Reporting", the SDT should maintain focus on only those items that are absolutely necessary to maintain the reliability of the Bulk Electric System. In fact, the purpose of reporting per EOP-004 is that disturbances... need to be studied and understood to minimize the likelihood of similar events in the future.</p>
	<p>No</p>
	<p>This is not a standards issue, and NERC should not dictate the reporting structure. It should be left to the RCs and their members.</p>
	<p>Yes</p>

	We agree with the concept that there should be one report form for all functional entities (whether located in the US, Canada, Mexico) for use in reporting to NERC. This would provide for a consistent reporting format across the continent.
	Yes
	We agree with the objective of eliminating duplicate reporting. However, EOP-004 currently allows substitution of DOE OE-417 in place of the NERC Interconnection Reliability Operating Limit and Preliminary Disturbance Report. As suggested in the Concept Paper, entities meeting the criteria of OE-417 are still obligated to file a report with DOE. Given that and the fact that CIP-001 requires no actual reporting, it is not clear where duplication exists today. We agree with the recommendation to eliminate the need for filing duplicate reports such as the DOE form OE-417. There is no benefit with regard to CIP-001 in filing separate reports. Duplicate reports introduce the potential for incomplete information to be supplied to responsible parties. Removing jurisdictional agencies from the Standard, and having NERC provide either query or situational awareness to those agencies being considered, might not be easy to achieve. There is an obligation under law to require entities to report to the DOE on the OE-417 form as amended or modified. This might drive the "omitted" agencies to have reporting laws enacted as well.
	No
	We believe that physical and cyber events must be investigated before a determination of sabotage or impact event can be made. The purpose of the NERC Standards is to maintain the reliability of the BES. Therefore, impact events should define or clarify the circumstances that would or could affect reliability. Reportable items should be based on impact to reliability, not on 'newsworthy' events or to gather information for trending. It is the law enforcement industry's responsibility to make a determination of "sabotage" or other. This determination cannot definitively be made by industry personnel, there is no expertise or time to investigate causes. It is the industry's job to mitigate effects. Examples would help provide for better guidance/direction. Industry examples would be welcomed to help reinforce developed internal processes for compliance.
	SERC and RFC are developing additional requirements at this time. We suggest that reporting be based on impact to reliability, not on 'newsworthy' events. We therefore do not agree with such regional efforts and would prefer a continent wide reporting requirement.
	a. NERC should focus efforts on developing specific event reporting criteria and not base the requirement on the definition of the term 'sabotage', but on the reporting criteria itself. See comments above. b. The "opportunities for efficiency" discussed in the Concept Paper would be best achieved by focusing on those items that are absolutely necessary to maintain the reliability of the Bulk Electric System. If there are elements that need to be reported that do not support this objective, then that reporting should not be required in reliability standards. Consider making NERC the distributor of reports to other agencies. We recognize that the key is to simplify reporting to a single form, and to the extent possible, to one agency. "Front line" reliability personnel must have the "timely" knowledge to know when a situation warrants local, area, regional, or national involvement.
	Individual
	Darryl Curtis
	Oncor Electric Delivery Company LLC
	Yes
	NERC Guideline: Threat and Incident Reporting" document should be used for guidance as it identifies best practices for reporting.
	Yes
	Oncor agrees that with this reporting hierarchy, in that dual reporting should be eliminated
	Yes
	Oncor agrees that by using the same type reporting format, there should be consistency in regard to each functional entity's expectations.
	Yes
	Oncor agrees that this effort should eliminate file duplication
	Yes
	Oncor agrees that there are no broadly used guidance documents that detail how an event may be accurately defined.
	Oncor is not aware of any regional reporting requirements beyond the scope of CIP-001, CIP-008 and EOP-004.
	Group
	SERC Reliability Coordinator Sub-committee (RCS)
	SERC RCS
	No
	Routine minor incidents such as copper theft and gun shots to insulators should not be reported. These types of minor events do not affect the reliability of the BPS. Existing reporting requirements are satisfactory. The focus of reporting should be on reliability related incidents and not incidents related to vandalism as such.



























	No
	The RC should not be responsible for submitting the report to FERC, NERC or the RRO. The RC may not have the necessary first hand information concerning the facts of the event. Situation awareness can be maintained by including the RC in the distribution of any sabotage related reporting.
	Yes
	There should only be one report for all functional entities.
	No
	The requirement should be a single report that satisfies the need for all US governmental agencies as well as NERC and the RRO's.
	No
	Impact events that do not affect reliability should not be reported.
	We are not aware of any regional reporting requirements beyond the requirements of CIP-001, CIP-008 and EOP-004. However, the SERC RRO has shared a list of events of interest that it would like to be made aware of to maintain situation awareness.
	None.
	Group
	Arizona Public Service Company
	Arizona Public Service Company
	No
	APS supports standard revisions which streamline the reporting process for security incidents with a single form, which aligns both with EIA reporting and NERC Standards requirements, particularly those identified in the NERC Threat and Incident Reporting Guidelines. This would eliminate users issuing reports to multiple locations/government entities without a standard form or format. The DOE 417 form which is currently utilized for reporting purposes is outdated and does not account for the types of incidents as identified in the NERC Threat and Incident Reporting Guidelines. The guidelines state that an entity can report security incidents to the ESISAC , through CIPIS (Critical Infrastructure Protection Information System), and or RCIS (Reliability Coordinator Information Center). CIPIS refers an entity to the NICC and to the WECC. Additionally, APS proposes that the terms and timelines of reporting security incidents be clearly identified. Events are often detected quickly or immediately. Determining whether or not the event was sabotage and/or a reportable event; however, typically takes much longer. There is no time allowance for an entity to investigate the event to determine what actually occurred. Currently, DOE 417 provides that acts of sabotage should be reported within one hour of detection if the impact could affect the reliable operation of the bulk power system. This may affect the accuracy of the information being provided by an entity on it's initial reporting. Finally, provisions should be incorporated to address the privacy of information being submitted, including handling and storage.
	Yes
	All disturbance reporting should go through the RC.
	Yes
	APS supports the standardization of the form for consistency and format.
	Yes
	APS supports eliminating the need to file duplicate reports. This standardized form should generate and send the DOE OE-417 report, totally eliminating duplicate work. Streamline the process.
	Individual
	Edward Bedder
	Orange and Rockland Utilities, Inc.
	Yes
	However, the SDT needs to maintain clear demarcation for the criteria for reporting events, and only those events that directly effect the reliability of the BES.
	Yes
	Having the reporting flow through the Reliability Coordinator supports the reliability objective of assessing, monitoring, and maintaining a wide-area view of the reliability of the Bulk Electric System. The reporting hierarchy should be to submit the information to the Reliability Coordinator, and to have the RC submit the report. This would eliminate the duplication of information.

	Yes
	We agree with the concept that there should be one report form for all functional entities (whether located in the US, Canada, Mexico) for use in reporting to NERC. This would provide for a consistent reporting format across the continent.
	Yes
	No
	Physical and cyber events must be investigated before a determination of sabotage or impact event can be made. Impact events should define or clarify the circumstances that would or could affect reliability. Reportable items should be based on impact to reliability, not on 'newsworthy' events or to gather information for trending. It is the law enforcement industry's responsibility to make a determination of "sabotage" or other. This determination cannot definitively be made by industry (operating) personnel. If NERC's definition is expanded for CIP-001 and/or EOP-004, responsibility and timing of reporting needs to be addressed so that appropriate agencies conduct the investigation and assessment. Operating personnel need to remain focused on the primary responsibility of mitigating the effects.
	NERC's SDT effort requires a clear, consistent, and comprehensive continent-wide approach, thus mitigating any need for regional reporting requirements.
	Individual
	Kasia Mihalchuk
	Manitoba Hydro
	Yes
	The "Threat and Incident Reporting" document contains a lot of detailed information which greatly assists in determining reporting events and weeding out non important events. The document contains some examples and expected reporting time lines. Attachment 1-EOP-004, though considerably smaller and condensed it does contain some detail not mentioned in "Threat and Incident Reporting". Integrating the "Threat and Incident Reporting" into Attachment 1-EOP-004, though large in size, has lots of information and is easy to follow would be a large improvement to existing protocol OR SEE QUESTION 3 COMMENTS. Incidences we have experienced on our system, in past were difficult to delineate as reportable, who to report to and when. An improvement to this Standard is welcome.
	Yes
	The Reporting Concept states that the new hierarchy is, " Affected entity to TOP/ BA to RC. Then the RC will then submit to NERC and DOE (if required)". This will enhance the existing requirement EOP-004-1 R4 which states that the RC shall assist the affected entity by providing representatives to assist in the investigation (this is also all reiterated in Attachment 1-EOP-004) . In an disturbance, the local resources would be tied up in the rectification of the problem. Analyzing and reporting the event (is it reportable, who to report to, what is the timeline) is distracting and time consuming. By leaving the final upper level steps of reporting to NERC/DOE by the RC would be efficient.
	Yes
	This is a promising idea, though there would be different requirements for the three countries, this could easily be rectified with "drop down menus". This electronic form could contain a lot of information without distracting clutter as you "tree" down the menu depending on the event that occurred. This could also contain electronic references to information located in Attachment 1-EOP-004 and Threat and Incident Reporting.
	Yes
	This could be easily incorporated into the electronic form. You could be prompted for information required immediately, and notified for information that could be entered later. This form could contain all the enterable data that all agencies could require. If the form is live and on line, all entities could be notified (depending on the entries) of an going event immediately. Form could be web based similar to ARS program or even integrated into the ARS program.
	Yes
	Though there are some specific events already included in this new definition, more could be added to dissolve specific "gray areas" and as new ones come up. Again these examples could be added into the electronic form and could contain a large data base which would be available depending on the event that occurred.
	No. CIP-001 contains references to NERC and the DOE. CIP-008 makes exclusions for facilities regulated by US Nuclear Regulatory Commission and Canadian Nuclear Safety Commission. It also contains references to ES ISAC (Electricity Sector Information Sharing and Analysis Center). EOP-004 contains reference to NERC and DOE There is no reference to Homeland Security, FBI, etc or to Canadian equivalent references in any of these Standards. When NERC is notified of an event, it is likely other organizations will have to be notified. There should be some sort of consistency to cover all these Standards and all notifiable parties at a NERC Standards level.
	No
	Individual
	Brian Bartos
	Bandera Electric Cooperative, Inc.

	Yes
	Yes
	This approach, while I suspect will not be universally agreed to, should provide some definitive guidance in reporting.
	No preference in this area.
	Yes
	One can only assume the number of reports required in this area will continue to increase in terms of scope and to which agency wants this data. The SDT is encouraged to attempt to find a reporting format and scope that does not needlessly duplicate or complicate overall reporting obligations.
	Yes
	In principle, I agree with this concept. Would like for the SDT to pursue this further and seek additional comments at that time.
	No.
	I commend the SDT for working on this effort and wish them success.
	Group
	PacifiCorp
	PacifiCorp
	Yes
	Yes
	Yes
	Yes
	Group
	E.ON U.S. LLC
	E.ON U.S.LLC
	Yes
	E.ON U.S. believe that the guidelines provide greater clarity for reporting forced outages caused by disturbances and sabotage but there remains issues that in need of further clarification. For example, there remains too much subjectivity on the reporting of forced outages when there is "identification of valuable lessons learned"
	Yes
	The hierarchy will simplify reporting from the entity in that the RC is always notified and then the RC notifies other parties as required, (with the exception of OE-417, which still has to be filled out per law) E.ON U.S. recommends that the drafting team pay particular attention to the report process to make sure that duplicate reports are not being required. Currently information on forced outages is already communicated to the RC so formalizing a requirement to provide data to the RC may represent duplication to reports already provided.
	Yes
	E.ON U.S. supports the proposal.
	No
	Reliability standards are federal law enforced by fines that can reach up to \$1,000,000 per day of violation. There is no reason to deliberately include ambiguity, i.e. "gray areas," in requirements such that registered entities are left unable to determine what it is they must do or refrain from doing to remain compliant. "Sabotage" for the purposes of these standards must be defined. .





















	Individual
	John T. Walker
	Portland General Electric
	Yes
	This process is in place and utilities are familiar with it. This is a good place to start.
	Yes
	PGE is familiar with and works closely with WECC today so the hierarchial consideration makes sense.
	Yes
	PGE supports the efforts of the Standards Drafting Team on the SAR for Project 2009-01 to consolidate the disturbance and saborage reporting processes as outlined in the concept paper.
	Yes
	PGE supports reducing the duplication of reporting.
	Yes
	PGE supports the DSR SDT's efforts to bring clarity and guidance to the spectrum of sabotage-type events.
	Individual
	Gregory Miller
	BGE
	Yes
	We have no problem with NERC using the existing guidance as the foundation for disturbance reporting; however, since this project proposes to investigate incorporation of the Cyber Incident reporting aspects of CIP-008, we feel that if adopted, this concept should be added to the NERC Guideline document "Threat and Incident Reporting".
	No
	As currently worded, BGE opposes the reporting hierarchy concept, since insufficient guidelines were proposed to prevent translation errors between the responsible entity (RE) and the RC. In addition to creating possible reporting errors, this also opens a risk that the RC could misrepresent the true intent of an RE's report contents if called upon to explain/justify a submitted report. Reporting delays are another concern with this proposal because the RE would basically be relinquishing control of the reporting process to the RC, while ultimately retaining the responsibility for ensuring the report gets submitted within the required timeframe. However, BGE recognizes that avoiding duplication and conflicting reports as well as encouraging communication are valuable. To make the reporting hierarchy concept acceptable to BGE, the DSR SDT must develop proper controls to ensure the RE has the ability to control or approve the information submitted and/or subsequently discussed with the respective authorities, and that it is done within the permissible timeframe to satisfy compliance requirements.
	Yes
	One form makes sense to us; less is better is the sense that it makes filing reports easier by not creating unnecessary complications.
	Yes
	We agree with this approach, as long as the latest version of the DOE OE-417 form is fully incorporated in the new single-reporting form, so that it maintains its credibility with the DOE.
	Yes
	We agree that "the spectrum of all sabotage-type events is not well understood throughout the industry"; however, we feel that the proposed concept of an "Impact Event" falls short of clarifying what constitutes such events. We believe that "Impact Events" needs further clarification to eliminate "gray areas" and to provide more reporting consistency between entities.
	We are not aware of any regional requirements beyond the scope of CIP-001, CIP-008 and EOP-004.
	1. If we move to a "one size fits all" single reporting form, it is important that the form be properly developed to cover any foreseeable event, which appears to be the intent of the DSR SDT, as outlined on page 4 of the concept document. Such an approach should also incorporate a single point of contact for reporting information, to avoid any confusion. 2. We would like clarification that any proposed CIP-008-related reporting requirement (including any linked reporting requirement between CIP-008 and CIP-001) is only applicable in situations where the incident/event involves a registered entity's Critical Cyber Asset.

	Individual
	Dan Roethemeyer
	Dynegy Inc.
	Yes
	We agree with using the guidance; however, please consider revising the NERC Guideline: Threat and Incident Reporting document to (i) lengthen the reporting timelines related to attempted sabotage to allow for additional time to deem the threat credible, (ii) expand the description of forced outage of generation greater than 2000 MW to include whether it is at the BA or GO level and if GO level, whether it is for one site or the combined GO's sites in a Region, and (iii) add a Responsible Party column to the Appendix A matrix.
	Yes
	This seems to be straightforward approach in that the RC is the best judge of threats to the overall system and could eliminate multiple reports of a single event.
	Yes
	Please keep it short and simple.
	Yes
	Short and simple should be the goal.
	Yes
	We agree with the concept but please provide specific examples. Also, please consider whether there are any penalties for misinterpreting an incident, who would determine if an event was a threat, and whether this could result in over reporting non-threats.
	Please consider MISO RTO-OP-023.
	N/A
	Group
	Electric Market Policy
	Dominion Resources Services, Inc.
	Yes
	Yes; however, in considering guidance found in the document "NERC Guideline: Threat and Incident Reporting" the SDT should maintain focus on only those items that are absolutely necessary to maintain the reliability of the Bulk Electric System. In fact, the purpose of reporting per EOP-004 is that disturbances... need to be studied and understood to minimize the likelihood of similar events in the future.
	Yes
	Having the reporting flow through the Reliability Coordinator supports the reliability objective of assessing, monitoring, and maintaining a wide-area view of the reliability of the Bulk Electric System.
	Yes
	Yes, we agree with the concept that there should be one report form for all functional entities (whether located in the US, Canada, Mexico) for use in reporting to NERC.
	Yes
	Yes, we agree with the objective of eliminating duplicate reporting; however, EOP-004 currently allows substitution of DOE OE-417 in place of the NERC Interconnection Reliability Operating Limit and Preliminary Disturbance Report. As suggested in the Concept Paper, entities meeting the criteria of OE-417 are still obligated to file a report with DOE. Given that and the fact that CIP-001 requires no actual reporting, it is not clear where duplication exists today.
	Yes
	We believe that physical and cyber events must be investigated before a determination of sabotage or impact event can be made.
	SERC and RFC are developing additional requirements at this time. We suggest that reporting be based on impact to reliability, not on 'newsworthy' events. We therefore do not agree with such regional efforts and would prefer a continent wide reporting requirements.
	a. NERC should focus efforts on developing specific event reporting criteria and not base the requirement on the definition of the term 'sabotage' but on the reporting criteria itself. b. The "opportunities for efficiency" discussed in the Concept Paper would be best achieved by focusing on those items that are absolutely necessary to maintain the reliability of the Bulk Electric System. If there are elements that need to be reported that do not support this objective, than that reporting should not be required in reliability standards.
	Individual
	Rick Terrill
	Luminant

	No
	While the guidance is generally ok in the “NERC Guideline: Threat and Incidence Reporting”, the reporting timelines include 1 hour, 2 hours, 4 hours, 6 hours, 8 hours, 24 hours, and 48 hours. Please simplify and reduce the variation in timelines. When it comes to Sabotage reporting, some time requirements start with detection, some start with determination of sabotage and some events do not specify the trigger for the reporting clock to start. Again, please provide clarity and consistency around the start of the timeline for reporting. Generally, the reporting timing should start with the recognition or determination that a suspected or known sabotage event occurred.
	Yes
	Luminant believes that one report should be filed with the Reliability Coordinator or one responsible entity, who then files the report with all applicable entities.
	
	Yes
	Luminant agrees with the concept of reducing reporting requirements, but asks the SDT to go even further. In the concept paper, the SDT discussed that information would not be duplicated on the NERC report and the DOE OE-417 report. The concept paper described a process where one report would simply supplement the other, but two reports would still be filed when required. Can the NERC SDT work with the DOE to develop one report to meet the needs of NERC and the DOE?
	No
	Luminant would prefer to report disturbances and sabotage events. The reporting of impact events could lead to unnecessary reporting. A definition of an “impact event” may be even more confusing than sabotage events.
	
	Luminant disagrees with the direction of utilizing impact events, as this is an expansion in scope beyond the simplification of sabotage and disturbance reporting.
	Group
	MRO’s NERC Standards Review Subcommittee
	Midwestreliability Organization
	No
	We agree with using the present documentation but would like just one reporting form. We are concerned that the guidelines and reporting periods specified within the DOE OE-417 report conflict with the NERC Guidelines. For example, DOE OE-417 report requires “Suspected Physical or Cyber Impairment” to be reported within 6 hours. The NERC guidelines indicate “Suspected Activities” are to be reported within 1 hour. We recommend the SDT use the DOE OE-417 report as a guiding document, and then determine additional reporting requirements using guidance from the NERC Guideline. FERC Order 693 appears to indicate conflicts and confusion with NERC reporting requirements and DOE reporting requirements should be eliminated.
	No
	We agree a coordinated reporting process is beneficial for the entity and the Reliability Coordinator (RC). However, a hierarchy would likely lengthen the reporting timeframe, or reduce the allotted time for each entity to provide notification to the RC in order to meet DOE or NERC timelines. Communication and coordination with the RC would likely provide more accurate and complete data submissions within a timely process and create shared accountability for the report being submitted.
	Yes
	However, We believe the primary goal should focus on “each entity” being able to submit one report for all functional requirements. Entities in the US that are required to submit the DOE OE-417 form should not be required to submit an additional form developed for other entities (Canada & Mexico). One approach to satisfy this goal is for NERC to require all entities (US, Canada, & Mexico) to complete the DOE OE-417 form as their report.
	Yes
	We agree with the concept to eliminate duplicate reports. However, we are concerned with the reference of the DOE OE-417 report being a “supplement” of the NERC report rather than “accepted” as the NERC report.
	No
	Rather than attempting to define a new term (impact event), we suggest that the concept of impact event be replaced with further defining sabotage and providing guidance on trigger events (impact event) that would cause an entity to report.
	No Comment.
	Confusion often arises in the industry between the CIP standards and other reliability standards based on CIP-001 naming convention. We would suggest the SDT retire CIP-001 and incorporate requirements within the EOP-004 standard or a new EOP-xxx standard to avoid confusion rising from CIP and other NERC Reliability Standards. Additionally, we assume the SDT has been created to specifically address FERC Order 693 directives to the ERO which appears to include the following items: 1. Applicability – “possible revisions to CIP-001-1 that address our concerns regarding the need for wider application of the Reliability Standard... the ERO should consider whether separate, less burdensome requirements for smaller entities may be appropriate” (FERC, 2007, para. 460). 2. Definition of Sabotage – “we direct that the ERO further define the term and provide guidance on triggering events






	<p>that would cause an entity to report an event... we believe the term sabotage is commonly understood and that common understanding should suffice in most instances... the ERO should consider FirstEnergy's suggestions to differentiate between cyber and physical sabotage and develop a threshold of materiality." (FERC, 2007, para. 461-462) 3. Periodic Review and Testing – "directs the ERO to incorporate a periodic review or updating of the sabotage reporting procedures and for the periodic testing of the sabotage reporting procedures." (FERC, 2007, para. 466) 4. Redundant Reporting – "now direct the ERO to address our underlying concern regarding mandatory reporting of a sabotage event... Regarding the potential for redundant reporting under CIP-001-1 and other government reporting standards, and the need for greater coordination... We direct the ERO to explore ways to address these concerns – including central coordination of sabotage reports and a uniform reporting format... with the appropriate governmental agencies that have levied the reporting requirements." (FERC, 2007, para. 468-469) 5. Specified Time – "the Commission directs the ERO to modify CIP-001-1 to require an applicable entity to contact appropriate governmental authorities in the event of sabotage within a specified period of time... the ERO should consider suggestions raised... to define the specified period for reporting an incident beginning from when an event is discovered or suspected to be sabotage" (FERC, 2007, para. 470). 6. Summary of CIP-001-1 – "the Commission directs the ERO to develop the following modifications... (1) further define sabotage and provide guidance as to the triggering events... (2) specify baseline requirements regarding... procedures for recognizing sabotage events... (3) incorporate a periodic review... and for the periodic testing... (4) require an applicable specified period of time. In addition... address our concerns regarding applicability to smaller entities... consolidation of the sabotage reporting forms and the sabotage reporting channels with the appropriate governmental authorities to minimize the impact of these reporting requirements on all entities." (FERC, 2007, para. 471) 7. Analyze Performance – "at a minimum, generator operators and LSEs should analyze the performance of their equipment and provide the data... The Commission directs the ERO to consider this concern in future revisions... that includes any Requirements necessary for users, owners and operators... to provide data that will assist NERC" (FERC, 2007, para. 613, 617). 8. Reporting Time Frames – "The Commission directs the ERO to change its Rules of Procedures to assure that the Commission also receives these reports within the same time frames as the DOE." (FERC, 2007, para. 618)</p>
	Individual
	James Stanton
	SPS Consulting Group Inc.
	No
	At least not exclusively. The current standards and the guidance fail to consider that different registered entities will have different scopes of awareness for when disturbances may take place. We want to avoid the situation where a generator (for example) is cited for failure to report a disturbance of which they have way of knowing occurred.
	Yes
	Yes
	There should have probably been one report all along.
	Yes
	Duplication is inefficient and casts the whole reporting mechanism in a questionable light.
	Yes
	The term sabotage was always too narrow a concept for the standards. At times, questionable activities are not confirmed as sabotage events until well after the fact, forcing the registered entity to speculate on whether or not to report an activity that may not be a confirmed sabotage event at the time, and hence encounter another silly violation based on imprecise terminology.
	Again, please consider the unique scope of the entities to which these standards are to comply. Don't dump all the requirements on all the applicable entities and perpetuate the current practice of forcing them to parse the requirements into what is logical or illogical from their perspective. The drafting team should have the expertise to do this. Identify which requirements apply to which applicable entity.
	Individual
	Andrew Gallo
	Calpine Corp.
	Yes
	Yes
	A Functional Entity such as a Generator Owner/Operator is not always aware that an event, such as a plant trip, is part of a wider system disturbance that rises to the level of a reportable event under EOP-004. A reporting hierarchy that allows a Generator to report the facts to its Transmission Operator and have that entity take a wider view to determine whether there is a disturbance should facilitate the reporting of actual disturbances. The SDT needs to ensure that some thought goes into the flow of information within the hierarchy and what triggers are needed to drive the reporting up the hierarchy.































	Yes
	A single approach is desirable, particularly for those entities that find themselves in multiple regions or countries.
	Yes
	Clarification, simplicity and the removal of duplicate reporting is beneficial.
	Yes
	Individual
	Steve Alexanderson
	Central Lincoln
	No
	The guidance document makes no distinction between entities that operate 24/7 dispatch and those that don't. The 1 hour and even the 24 hour reporting requirements in some cases will be impossible for entities without 24/7 dispatch to meet without changing business practices. These are the same entities that present little or no risk to the BES.
	Yes
	In the west at least, this hierarchy should be extended to include BA's as indicated in the Concepts Paper. See http://www.bpa.gov/corporate/business/reliability/Docs/2007/PNSC_RE_Data_Letter_2_070723.pdf for the RC's policy on which entities it chooses to communicate with.
	Yes
	The existing reporting is needlessly complex. We appreciate the SDT's goal.
	Yes
	The existing reporting is needlessly complex. We appreciate the SDT's goal.
	Yes
	An act of vandalism may have impact. An act of sabotage may not be impactful alone, but may be part of a wider coordinated attack. Dictionary definitions speaking of "intent" are not helpful in this regard, since acts of vandalism and sabotage are both generally committed intentionally. Saboteurs, though, work for a higher cause. That cause may be political, social, environmental, etc. We ask that the SDT look beyond dictionary definitions in developing a definition of sabotage.
	Individual
	Brenda Frazer
	Edison Mission Marketing & Trading
	Yes
	Yes
	Yes
	With the realization that having a common report form may be difficult to coordinate between different agencies.
	Yes
	No
	There are too many special circumstances to try and capture. I feel this would be best delivered as a guideline.
	I don't know of any.
	No other comments.
	Individual
	Martin Bauer
























	USBR
	Yes
	The reporting outlined in the proposed plan does not include a clear indication of how NERC will use the information they collect from the entities. Care needs to be taken in addressing the reporting requirements to not create a more confusing or onerous reporting process.
	No
	The existing reporting methods collect reports of disturbances and analyze them by committees of the respective coordinating councils. The new process would introduce a duplicate layer and associated staffing. It would be better to ensure communication between the existing committees of the respective coordinating councils and the RC rather than creating a new layer of review tracking and analysis. While the layered reporting hierarchy discussed in the Disturbance Reporting section of the paper will eventually help with overall event awareness, the additional delays the hierarchical approach could result in a decrease in situational (timely) awareness. Having more comprehensive information as a result of the potential enhancements each layer adds to the chain of reporting may not be more valuable than timely and well disseminated information in an actual disturbance situation. We would suggest the SDT give careful consideration to this proposed direction. It may be appropriate to consider that expedited reporting of operational impacts would outweigh the benefit of administratively intensive reporting procedures. The events reported through the existing process have not yielded material feedback other than statistical analysis. Statistical analysis is not as sensitive to timely reporting. Operational impacts which may be the result of possible sabotage may be evident through assessment of widespread outage patterns or following event analysis. Comprehensive event analysis can take anywhere from 15 days to 90 days depending on the event.
	Yes
	The Bureau of Reclamation utilizes a form for tracking unexpected events. This form contains information which the agency considers important for its one reliability improvement program. The form is also used to meet NERC standard requirements for protection system operations analysis. This form contains most of information required by DOE. The SDT should consider requiring the submission of specific information rather than lock responses in one specific form. In this manner the agency would be avoid duplicate forms, one for NERC, the other for agency purposes.
	Yes
	It should be clear what information is to be supplemented. The fewer times the information has to be handled the more efficient the process becomes. If the information exists on a required form, that legal form should be allowed. Also, if the form is already submitted, then reference to it should be sufficient rather than requiring resubmission of the form. That would require handling the information again. As explained in the previous answer, the SDT should recognize that responsible entities have already developed internal reporting processes which utilize forms for consistent responses. Those forms may contain more information than is needed by the new standard to be proposed. The entity should be allowed to submit the internal form or else duplication would be created, which may reduce the effectiveness of an entities reliability improvement program.
	Yes
	There should be a clear distinction between a cyber event and a cyber event that has a material impact on the reliability of the bulk electric system. Not all CIP-008 events will carry such a distinction. That being said, CIP 008 cannot be completely incorporated in this process. Denying access to a cyber asset is noteworthy under CIP008 but may not pose a threat to the reliability of the bulk electric system. Consider recognizing the impact on the bulk electric system when modifying definitions of adding the bulk electric system description to the definitions. This will help to clarify that disturbances, as discussed in this effort, are situations that produce an abnormal condition on the electric power system, not necessarily on ancillary or supporting systems, such as SCADA systems or the water-related systems at hydroelectric dams.
	
	The concept of "threat" evaluation criteria is somewhat vague and a great care is needed to ensure it is clear enough that the most individuals would be able to analyze an event and end up at the same threat. Otherwise it would be almost impossible to ensure compliance with a requirement which cannot accurately describe criteria to be used to ensure that proper evaluation has occurred.
	Individual
	John Alberts
	Wolverine Power Supply Cooperative, Inc.
	Yes
	I agree with referencing existing guidelines - However: My concern is that, until all reportable incidents are analyzed by the parties to which they are reported, their "impact" on the BES will not be quantified. Therefore, the tendency to want to "report all events so that their impact can be determined" or "report all events because the information can be utilized for informational purposes, regardless of impact on BES" might lead to expanded reporting requirements, some of which may have questionable value from a reliability standpoint.
	Yes
	From the perspective of a TOP, this seems to alleviate reporting burden and move it upline. I can understand the logic in wanting the reporting to flow through the RC for awareness purposes, but I can understand the RC's reluctance to bear the additional potential burden. Again, a focused effort to minimize the necessary reporting to "true impact events" should be kept in mind, regardless of who has to report. Collecting reams of data and figuring out what

	impact it has later should not be the goal.
	Yes
	I can't see how anyone would disagree with this concept - However - I question how practical it will be to implement, since various agencies would have to collaborate and coordinate to accomplish this task.
	Yes
	I agree with the concept of minimizing duplication - See previous question 3 for concerns.
	Yes
	I agree with the concept of focusing on impact instead of the type of event (sabotage, accident, vandalism, etc.) I hope that the reporting proposal that comes out of this project will clearly make a separation between true impact events that must be reported per the standards (enforceable), vs. "other" information that may be (electively - not enforceable) reported, per some set of guidelines.
	The concepts of removing duplication, consolidation, and focusing on "impact events" sound logical. I am concerned that the focus may drift to expanded reporting, not reduced reporting.
	Individual
	Thad Ness
	American Electric Power
	Yes
	Yes
	This approach may work as long as there is a uniform process across all of the Reliability Coordinators. AEP owns and operates BES facilities under three separate RCs and having differing rules and processes would create confusion and additional burdens. There are some concerns about the time lag of reporting the information and this might not work well in all cases especially if the information and knowledge are at the local level. AEP recommends that the standard could have a default hierarchy, but this should not prohibit any entity from reporting directly.
	Yes
	Yes
	Yes
	Individual
	James McCloskey
	Central Hudson Gas & Electric
	Yes
	Central Hudson agrees with using the "NERC Guideline: Threat and Incident Reporting" in the development of requirements. Central Hudson has currently in place a NERC-DOE Threat and Incident Reporting Table developed from this NERC Guideline that allows for a quick-reference to all threat and incident reporting criteria (arranged by category) with a cross-reference to the specific reporting form (NERC Interconnection Reliability Operating Limit and Preliminary Disturbance Report, DOE Form OE-417, or NERC ES-ISAC Threat and Incident Report Form). Central Hudson recommends maintaining the option of utilizing only 1 form, the DOE Form OE-417, for incidents that require reporting to the DOE and NERC to maintain the streamlined approach to this reporting process.
	Yes
	Central Hudson agrees with this reporting hierarchy for disturbances given the "wider-view" of the Reliability Coordinator as opposed to an entity such as a Transmission Owner or Load-Serving Entity. While, based on past experience, the current process works if reports are filed to the DOE, RRO, and RC simultaneously via email for example. However, the RC is in a better position to identify multi-site incidents and escalate the reporting process if necessary.
	Yes
	Central Hudson agrees with this goal if the intent is to develop and implement an electronic version that would meet DOE requirements as well.
	Yes

	Central Hudson agrees with this concept and, as stated in a previous response, recommends that the ability of utilizing the DOE OE-417 to supplement the NERC report be maintained.
	Yes
	Central Hudson agrees with this concept, particularly if the reporting hierarchy through the RC is implemented in order to better identify trends.
	Although not beyond the scope of these standards, NPCC maintains a document and reporting form (Document C-17 - Procedures for Monitoring and Reporting Critical Operating Tool Failures) that outlines the reporting requirements, responsibilities, and obligations of NPCC RCs in response to unforeseen critical operating tool failures.
	The NERC Guideline: Threat and Incident Reporting Attachment A matrix is an extremely beneficial document that organizes reporting criteria. However, it identifies communications systems failure sub-category under the Equipment And/Or Systems Failure category as reportable with a reference to OE-417 - Schedule 1, Item 10. Item 10 on Schedule 1 addresses only failures due to attacks (not failures for other reasons).
	Individual
	Deborah Schaneman
	Platte River Power Authority
	Yes
	Yes
	Situational awareness would be enhanced. All affected entities would be aware of the disturbance and relevant information. Also, the flow of information between entities would be enhanced and a more comprehensive report could be developed.
	Yes
	Yes
	Yes
	Individual
	Howard Rulf
	We Energies
	No
	While the NERC Guideline includes readily discernible information (and we would like to see that format carried forward into any future documentation), utilize OE-417 as the foundation document in order to eliminate reporting redundancies. If supplemental references are necessary for the proposed resolution, list the document as an official attachment to the standard. Minimize the need to search in multiple locations for guideline information – some may not be aware supporting documentation exists without explicit reference within the standard.
	Yes
	A hierarchical approach in conjunction with a single, electronic form would provide consistent reporting timelines, provide clarity in the reporting process, and provide more accurate and meaningful data submissions while having shared accountability. Confusion in the current method could be alleviated while providing more consistency in the reporting of an "impact event".
	Yes
	Agree in conjunction with proposed concept that DOE OE-417 will be allowed to supplement the NERC report in lieu of duplicating entries.
	Yes
	However, also evaluate whether or not DOE OE-417 is sufficient in lieu of a NERC report. If additional information is required, duplicate format of DOE-OE-417 with additional NERC information listed at the end of the form.
	Yes
	We would prefer to refer to all sabotage, vandalism, cyber attacks, and other criminal behavior as impact events. Focusing more on the event's impact on reliability and its ramifications on the systems seems to be more useful than to try to determine the intent of the perpetrator.
	What is meant by beyond the scope of the referenced standards? We Energies also has reporting obligations with the MISO RC (MISO OP-023), RFC (PRC-002-RFC-01), and the Wisconsin and Michigan Public Service Commissions.

	<p>Give consideration to combining CIP-001 and EOP-004-1 through a common categorization. For example, "System Risk Reporting" could encompass both actual and potential events and would minimize the need to cross reference both standards, and provide one location for event and potential-event reporting. Much of the challenge in this project is in achieving a common understanding of the words sabotage and terrorism. There are nuances of meaning in the words that imply a relationship between the attacker and the victim, or a motive other than simple profit or mischief. This nuance of meaning requires the victim of the damage to discern a relationship or motive which may not be discoverable in the relatively brief time window during which the entity must report the event. In fact, they may never be known. Consequently, We Energies recommends elimination of the words sabotage and terrorism from these standards. We also recommend elimination of the word vandalism since it also implies an ability and duty to discern whether a particular act (barbed wire thrown over transformer bushings) was done out of pure mischief (vandalism) or with intent to destroy equipment for a political purpose (terrorism). And if the act was committed by a disgruntled employee, it becomes sabotage. No wonder there is confusion and indecision. Instead, We Energies recommends using the simple words "criminal damage". One need not be a prosecuting attorney or FBI Special Agent to know what this means. Simply ask, "Does it look like somebody damaged it (or hacked in) intentionally?" and, "Did we give consent?" and you're done. With elimination of sabotage, terrorism and vandalism, and all of their baggage, comes the ability to integrate both CIP 001 and EOP 004. We now have criminal damage (or cyber attack) as just another event to be evaluated against certain pre-defined impact measures. No value judgments, no speculation. Another benefit of using these simple words and tests is that operating personnel, whether in the field or at the console, will not require special awareness training in discerning these nuances of meaning. They already have experience with the equipment or cyber systems and its normal performance. Operating personnel can readily assess whether an impact event is due to equipment failure, weather or animal contact vs. intentionally caused by a person. If it appears to be criminal damage, call the local police agency. Report the event and the impact. Cooperate with the investigation. Share your knowledge of the normal condition of the equipment or performance of the system. Share your experience with similar events. It will be important to highlight that the theft of all the grounding pigtailed in a substation is different from the act of simply snipping each of them to leave the equipment electrically floating. The technical condition is the same, but this allows the police to make an inference with respect to motive, suspect profile, sophistication, etc. That's their job. They may ask us to speculate on the motive or skills of the attacker. That's okay. But at least we don't have to know or guess at it for the purpose of determining whether to report the event. No training required. With respect to notification to the FBI, We Energies recommends that the standard merely state that the owner of the damaged asset ensure the local office of the FBI is notified. The standard should permit documentation of either a direct phone call by the asset owner or obtaining an assurance from the local police that they will do so. There should be no need to prove earlier establishment of a relationship with the FBI. There should be no expectation that the entity have a signed letter from the FBI Special Agent in Charge acknowledging his agency's duty. This document means nothing. With respect to reporting within the industry, We Energies recommends that the only events to be reported "up the chain" are those that we choose to characterize as "impact events". That is, the events that meet some measurable threshold with respect to BES impact. We should describe these efficiently to avoid over-reporting of trivial events. It is apparent that we are already over-reporting since DHS HITRAC recently fed back to the industry that copper thieves attacked a substation in San Bernardino, CA taking some of the grounding conductors. The industry should have the option to report non-impact events that are unusual in some respect and which may have some mutual industry benefit in terms of prevention, awareness or recovery. Attack attempts with no impact, or observations of suspicious activity could fall into this optional category. These optional reports could be aggregated by the entity for the purpose of detecting patterns or trends, or be reported ad hoc. The ES-ISAC should be the recipient of the reports. It should be the single point of contact since it has the industry insight, engineering expertise and cross-sector relationships to analyze and return valuable intelligence to the industry. With the ES-ISAC as the recipient of the reports, efficient sharing with Federal agencies, with the regional entities and with neighboring asset owners could be automated and rapid. There is much benefit to be gained from this project, primarily in the area of creating clarity and uniformity. There is some risk that the reporting requirements will become onerous and prescriptive.</p>
	Individual
	Jianmei Chai
	Consumers Energy Company
	No
	<p>The existing guidelines ignore the fact that there are currently three overlapping and inconsistent reporting requirements for disturbances of various types: CIP-001, EOP-004, and DOE OE-417. The reporting should be such that any single event type needs to be reported only once, and to only a single agency, for any disturbance. First, CIP-001 events should be reported to the ES-ISAC under one specific requirement (or set of requirements) and removed from OE-417 and EOP-004, such that all interested agencies obtain their information from only that one source. Second, OE-417 events should be reportable ONLY to DOE, and, again, other agencies should obtain their information from only that one source. If NERC wishes to make such reporting mandatory and enforceable, the NERC requirements should indicate ONLY that such reporting should be made in accordance with OE-417. Finally, EOP-004 (or similar requirements) should require reporting to NERC ONLY in the case of events that don't fit under CIP-001 or OE-417 requirements. Alternatively, OE-417 should be submitted ONLY to NERC and they should disseminate the information. EOP-004 has several issues and inconsistencies: a. EOP-004 requires that the entity that submits form DOE-417 to provide copies to NERC. The DOE-417 form intermixes NERC entity definitions (e.g. BA, LSE, TO) with generic terms such as "Electric Utilities" and "Generating Entities". Is it the Generator Owner or Generator Operator that is required to submit the information? There should be one form or at least well defined definitions that apply to both forms. b. EOP-004-1 R3.1 requires submittal within 24 hours, however Table 1-EOP-004-0 which purports to summarize the standard appears to change this requirement to 1 hour for several disturbances. Additionally, it incorrectly summarizes the reporting time for 50,000 customers, which is 6 hours in DOE-417 and summarized in Table 1-EOP-004-0 as 1-hour. An attachment to a standard should not be allowed to supersede the standard or create additional rules. c. EOP-004-1 R3.1 requires submittal within 24 hours. however Table 1-EOP-004-</p>





















	<p>0 which purports to summarize the standard appears to change the standard. R3.1 clearly states that events are to be reported within 24 hours of identification, however Table 1-EOP-004-0 state that the events are to be reported on the basis of the start of the disturbance. An attachment to a standard should not be allowed to supersede the standard or create additional rules. d. EOP-004-1 R3.1 requires submittal within 24 hours, however Table 1-EOP-004-0 which purports to summarize the standard appears to change the standard. R3.1 clearly states that events are to be reported within 24 hours of identification, however Table 1-EOP-004-0 states that copies of DOE-417 are required to be submitted "simultaneously". It also states that schedules 1 and 2 are due within 24 hours of start of the event instead of 48 hours for per DOE-417 for schedule 2. An attachment to a standard should not be allowed to supersede the standard or create additional rules. e. The requirement of loss of customers should be scaled based on customers served. Loss of 50,000 customers to a utility that serves 100,000 customers is different than loss of 50,000 customers to a utility that serves 2,000,000 customers.</p>
	No
	<p>It would be inefficient for RC's to accumulate ALL disturbance data and submit it, and to bifurcate the reporting based on type of disturbance above and beyond OE-417 data (which should go ONLY to DOE) would make a standard very involved for an entity to comply with. We're discussing after-event data here, not data needed for current operations – and there's no reason to make it any more complicated than necessary.</p>
	Yes
	Agreed – to the extent that it's consistent with the concept that any specific type of data is submitted to ONLY one entity.
	No
	NERC should either coordinate with DOE for a single reporting process or simply adopt the DOE's standard.
	Yes
	<p>We agree with the concept, however, based on the information provided, it may be too vague to be of value. Terms such as "potential" and "significant" can be subjective and therefore provide little direction. We would like to see something more specific. Also, inclusion of the destruction of BES assets may be too inclusive and needs to be restricted to BES assets that will cause a specific level of impact on reliability.</p>
	
	
	Group
	Western Electricity Coordinating Council
	WECC
	Yes
	<p>It is comprehensive; however, we must keep in mind that the OE-417 is required under Public Law 93-275 and needs to be attached if applicable in the US.</p>
	Yes
	<p>There should be an established time sequence that allows the RC to review the entities material prior to forwarding to NERC. By channelling all reports through the RC situational awareness will be enhanced. Instead of "submit information", it should be clarified that entities submit complete written reports to RC in electronic format.</p>
	Yes
	Canadian and Mexican entities should be consulted on content of report form to assure their "buy in".
	No
	<p>This will work well for the USA entities to save us time in re-entering the same information. We believe that FERC and NERC and the Regions should have one common reporting form for North America. The OE-417 is not required by law outside of the United States. Canadian and Mexican entities may feel that US DOE has no jurisdiction in these countries, and therefore no right to required reporting as is stated on the OE-417.</p>
	Yes
	<p>This will help eliminate regional differences in sabotage reporting. The definition should be broad enough so it covers new types of sabotage that may evolve. Event analysis facilitates situational awareness and if it requires further investigation regarding developing patterns and severity, it should be handled by law enforcement if need be.</p>
	There is a need to learn what reporting requirements are required by the Mexican and Canadian entities.
	<p>As stated previously, for "One stop shopping" we need "buy in" from the foreign nationals. The way to do this is to engage their opinions and respect their jurisdictional agencies as well.</p>
	Individual
	Amir Hammad
	Constellation Power Source Generation
	Yes
	The existing guidance is an excellent base on which to build changes to EOP-004 and CIP-001. However, the SDT

	must challenge each item in the different event categories and clarify or omit bullet points that are seemingly vague. For example, under System Disturbances, a forced outage report is needed when "a generation asset of 500 MW or above is on a forced outage for unknown reasons, or a forced outage of generation of 2,000 MW occurs..." Simply removing the 500 MW criteria would make this criterion less vague. There are other examples of this in the guideline.
	Yes
	As stated in the concept paper, a hierarchy ensures proper communications, but it has the added benefit of reducing redundancy on the Registered Entities, so long as responsibilities and accountability are clearly established.
	Yes
	
	Yes
	Constellation agrees with the concept of eliminating the need to file duplicate reports. If the single NERC reporting form is both comprehensive and easy to use, then using a single report should not be an issue. It is essential that all elements of DOE OE-417, and any similar documents, be incorporated into this single report. Not incorporating all elements will result in gaps in reporting for all Registered Entities.
	No
	Although defining an impact event would bring clarity to defining sabotage events, adding another situation would further complicate things. Furthermore, the examples of impact events used all fall under the Sabotage category in the Threat and Incident Reporting Guideline. Constellation Power Generation suggests the SDT further clarifies the items in the Sabotage category to ensure all grey area situations are included. Clarification is also needed in how a Cyber Security Incident (CIP-008) would map into the categories of Disturbance/Impact Events (CIP-001). To that point, Constellation Power Generation questions whether cyber related incidents should fall under the spectrum of sabotage type events, or remain separate and be incorporated in the CIP revisions. Having cyber related incidents separate from other sabotage events would provide the clarity and guidance that the DSR SDT is striving to achieve.
	
	Constellation Power Generation would like clarification that any proposed CIP-008-related reporting requirement (including any linked reporting requirement between CIP-008 and CIP-001) is only applicable in situations where the incident/event involves a registered entity's Critical Cyber Asset. In that vein, we want to emphasize the importance of the DSR SDT working with the CIP SDT on the cyber related events. If the DSR SDT is going to be adding clarity to cyber related events, then coordination with the CIP SDT is needed to ensure the same verbiage is being used. Furthermore, having any duplication of requirements will cause a double jeopardy scenario which would go against the SAR for the DSR SDT. As stated earlier, Constellation Power Generation also questions whether cyber related incidents should fall under the spectrum of sabotage type events, or remain separate and be incorporated in the CIP revisions.
	Group
	Public Service Enterprise Group Companies
	PSE&G
	Yes
	EOP reportable disturbances are familiar concepts in the industry.
	Yes
	The PSEG Companies believe that all entities with a reportable disturbance should report to the RC. The RC is best positioned to evaluate the impact of the event and forward the information to the appropriate entities. There should not be any intermediate entities to relay information to the RC as that can introduce delay and has the potential to introduce transcription errors. Sabotage events should be reported to the RC as well as to law enforcement. CIP-008 reporting is highly specialized and should be retained in the set of cyber security standards, not merged with CIP-001 and EOP-004.
	No
	While simplification and consistency is a laudable goal, it should not be applied to different governmental agencies (USA, Canada, Mexico) which may have different structures and processes. Moreover, results based standards should not include administrative matters such as reporting forms.
	Yes
	The PSEG Companies agree with the avoidance of duplicate reports. NERC report forms should not include anything in the DOE form, and NERC Regional report forms should not include anything in the DOE or NERC forms. Hence, a DOE report should not "supplement" a NERC form, but rather replace it unless the NERC form calls for other information for the same reportable incident, and likewise for the DOE - NERC - Regional form structure. DOE forms would be filed with DOE, NERC and the Regional Entity where the event originated. NERC forms would be filed with NERC and the region where the event originated and the Regional form filed only with the Region. In designing the NERC and Regional forms, the need to file multiple reports should be minimized, and in no event should any of the three (DOE, NERC, Region) forms contain duplicative information requests.
	Yes
	The PSEG Companies agree with the concept, but reserve judgment on the descriptions of the impacts. There is clearly a need to better define what constitutes a sabotage incident versus common theft or vandalism. Moreover,
















	where it may be impossible to determine if any given incident (e.g., several loose bolts on a transmission tower cross brace could be sabotage or could be human error in construction) falls within sabotage, a registered entity should not be second guessed in an audit if the registered entity determines not to report. Excessive unnecessary reporting can mask real incidents.
	The PSEG Companies believe that RFC is developing a regional disturbance reporting requirement for events not meeting the criteria of current DOE and NERC reports.
	If reporting does become the responsibility of the Reliability Coordinators, the RCIS should be made available view-only to registered entities with a notification when RC's have posted new entries. That will enhance the situational awareness of registered entities. The PSEG Companies disagree with inclusion of CIP-008 reporting requirements as part of the CIP-001 and EOP-004 initiative. CIP-008 reporting as part of the cyber security set of NERC standards is usually managed by specialized corporate organizations separate from those involved with the other NERC standards, and with highly specialized cyber skill sets. CIP-008 reporting requirements should remain where they are, and any perceived need for improvement addressed in the ongoing CIP Version 4 development process.
	Individual
	Greg Rowland
	Duke Energy
	Yes
	No
	The RC should not be responsible for submitting the report to FERC, NERC or the RRO. The RC may not have the necessary first hand information concerning the facts of the event. Situation awareness can be maintained by including the RC in the distribution of any sabotage related reporting.
	Yes
	There should only be one report for all functional entities to submit to NERC.
	Yes
	Since the OE-417 is a DOE required report, it must be submitted. Including the OE-417 as part of the NERC electronic form will facilitate reporting to NERC.
	No
	As FERC ordered in Order No. 693, the drafting team should further define sabotage and provide guidance as to the triggering events that would cause an entity to report a sabotage event. Suggested definition: "Sabotage – the malicious destruction of, or damage to assets of the electric industry, with the intention of disrupting or adversely affecting the reliability of the electric grid for the purposes of weakening the critical infrastructure of our nation."
	None
	We don't think CIP-001, EOP-004 and cyber incident reporting aspects of CIP-008 should all be combined into one standard, because of the significant differences between sabotage and disturbances. We have suggested that the drafting team further define sabotage, and we have included a suggested definition in our response to question #5 above. Sabotage is very specific due to the intent (for the purpose of weakening the critical infrastructure), and the potential impact to the BES. We believe that sabotage and cyber incident reporting should remain a part of the CIP Standards due to the emphasis placed on the criticality and vulnerability of the assets needed to support reliable operation of the BES. Cyber Security and Physical Security could be placed together in the same standard (remain in CIP) and other disturbances (i.e., accidental, natural) in a separate standard. "One stop shopping" for reporting is still possible as long as the OE-417 form is included as part of the NERC electronic form. And while we agree with the need for additional 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.
	Group
	ERCOT ISO
	ERCOT ISO
	Parts of the Guideline are helpful, but the guideline goes beyond the scope of the requirements of the current standards, which could pose potential audit concerns. ERCOT ISO strongly feels this approach for reporting should be focused on physical events only and cyber event reporting should be contained within CIP-008 only. Continue to keep physical separate from cyber.
	No
	There are some events that are truly local and should be handled by local entities and reported to local authorities (i.e. theft). If there is an impact or potential to have an impact to the BES or to the region, then hierarchical reporting would be appropriate.
	Yes

	Standardization ensures consistency and relevance of the information received.
	ERCOT ISO agrees with the concept of eliminating the need to file duplicate reports, but as stated in the Concept Paper, the DOE form (OE-417) is required by law. Based on this, the elimination of EOP-004 (after the fact reporting) is essential, since the OE-417 is mandatory and all-inclusive.
	ERCOT ISO recognizes the risks associated with "gray areas" not being clarified. While "gray areas" pose compliance risk due to differing interpretations, a risk remains that some items will go unreported. A more prescriptive approach raises an even greater risk of events not being reported. People will not report events that are not specifically listed, and will not use judgment in determining the need for reporting.
	All references to CIP-008 should be removed and we reassert that physical and cyber reporting should be separate. There is documentation available from the CIPC that the drafting team considered CIP-001 related physical sabotage reporting and specified cyber incident reporting requirements in CIP-008. ERCOT ISO requests the DSR SDT to continue to improve its guidelines and to post those guidelines for all to use, but not to create sanctionable standards whose good intentions could result in unintended adverse consequences for the Industry. ERCOT ISO also suggests that all reporting forms and guidance should be located in a central, easily accessible location, eliminating confusion and simplify reporting for system operators thereby directly enhancing reliability during system events. The industry would benefit from a central location or link on the NERC website containing all reporting forms.
	Group
	ISO RTO Council Standards Review Committee
	IESO
	Yes
	The guidelines in EOP-004 and its attachments should be retained as the foundation for reporting disturbances. One would note that such EOP Disturbances are relatively well defined reliability impacts. Thus EOP-004 disturbances are based on HOW certain events impacted the BES. [Sabotage on the other hand requires an implication of WHY an event occurred.] The original EOP-004 represents a common sense approach to defining reliability events that may be useful to analyze on a regional basis. In the current environment, Regions are not sanctionable entities but they still are valuable sources to collect, analyze and trend the few disturbances that occur in each region. To make use of Regions, however, precludes the use of sanctionable NERC standards. EOP-004 as written does not meet the NERC requirements for standards but it does meet the Industry needs for a guideline for reporting events that deserve to be reviewed. The SDT should propose deleting EOP-004 and use it as a Disturbance Reporting Guideline.
	No
	The idea of a reporting hierarchy provides an easy to follow pro forma approach. But disturbance reports should not always follow a common reporting path. A disturbance on the transmission system for example need not be routed through an "if applicable" Balancing Authority. To mandate that a BA be in the path is inappropriate. To leave the applicability open is to create a subjective compliance problem for the impacted BA. Copper theft is another example that should not require reporting up through the RC. It is a local issue and the Transmission Owner should be able to report this directly to the appropriate parties. How would a DP, LSE or GO know if an event is an "impact event"? The posed impact events are a series of conditions for sabotage but not for EOP-type disturbances. The aforementioned entities have no requirement to monitor and analyze the BES, which then means every event would be an impact event for those entities (not an EOP disturbance but an impact event). Thus every theft of copper is an impact event mandating a Disturbance Report even though the SDT notes the RC only has to send it to the "local authorities". This seems to be a misuse of the RC resources; every train derailment is an impact event requiring a Disturbance report (is that a commercial train, regional rail line a local trolley car); every teenage prank would also generate an impact event mandating a disturbance report. The SDT defined impact events are not appropriate for use in defining disturbances. There is a big difference from creating a set of guidelines to follow as opposed to creating sanctionable standards
	No
	The SRC supports NERC's initiative for Results Based Standards. The SRC understood RBS to mean the results were reliability based quantities not administrative quantities. There is no need for a NERC Reliability standard on reporting. The idea that all functional entities in each of the said countries will use one form would be a good idea if and only if all the countries and all of their agencies were willing to accept that form. The SRC does not believe that those agencies will be willing to cede what information they ask for to NERC; nor that NERC will be able to create a single form that all such agencies will accept.
	No
	The concept of eliminating duplication is laudable, but the idea of writing a standard to mandate reporting that involves reporting to governmental areas does not make sense unless NERC will do all of the reporting for the industry. A governmental agency is as likely as not to change the forms they require which would then mean two different reports (one for NERC and one for the given agency) or that the standard would have to be re-written every time there is a change.
	No
	The nature of the fact that "gray areas" exists preclude the idea of using a standard to report; particularly a standard for the vague topic of motivation such as sabotage events and the more defined disturbance events.
	The FERC Order merely asked NERC to "further define sabotage and provide guidance as to the triggering events

	that would cause an entity to report a sabotage event.” There is no requirement to create a Reporting Standard and no mention of Disturbance events. There is a strong need to avoid heavy-handed use of NERC standards particularly for such post event reporting guidelines. The SRC would urge the DSR SDT to continue to improve its guidelines and to post those guidelines for all to use, but not to create sanctionable standards whose good intentions will inevitably result in many unintended adverse consequences for the Industry. Rather, the SDT should seek to retire sanctionable requirements that require event reporting in favor of guidelines for reporting.
	Group
	Bonneville Power Administration
	BPA, Transmission Reliability Program
	No
	BPA likes the idea of consolidating information and eliminating duplication of reported information. In the report, don't include every detail possible found in the "Threat Guideline". TOP's are supposed to be operating the electrical system, not doing investigative work for copper theft incidents (see comment on #5).
	No
	The RC is made aware of these type of incidents and goes right back to incorporating that in their awareness and to focusing on system reliability. If the RC is the recipient for further distribution of information of this type they will be forever going back for more information. Eliminate the middleman in whatever concept you propose, folks have plenty to do now. Let people make good judgments with the direct field people on the seriousness of the breach with their security personnel contacting the appropriate law enforcement agency. (Or are you looking to do a simple RE reports to the RC who marks various category items on a secure website Yes/No category item indicator that can be rolled up in ES-ISAC mapboard.?)
	Yes
	As long as we don't make one form that requires extraneous information for the sake of having agreement.
	Yes
	Minimizing the number of reports is a good thing. The concept of actually sharing information should be utilized as much as practical.
	Yes
	BPA agrees with providing an industry-wide definition and guideline. We do NOT agree with requiring reports for every instance of every activity. If your definition is good, you'll get what is needed and not much chaff.
	Individual
	Kirit Shah
	Ameren
	Yes
	We agree that it makes sense to build upon existing documentation. However, we do not believe it is necessary to require event reporting to be in an enforceable standard. Rather the drafting team should consider developing a reporting guideline document and retiring the EOP-004 standard.
	Yes
	The heirarchy is appealing in the fact that the TOP/BA will be kept in the loop and receive critical information from the Generators, Distribution, LSE, etc. But there will be an inherent delay in reporting due to the fact that at every hand-off of information there will be questions for additional and/or clarified information, and there is always a possibility for the loss of information due to the transfer from one entity to the next. Further, this reporting through a heirarchy could also take away from the operators ability to respond to system events due to being tied to an information transfer ladder.
	Yes
	One report would be great for this standard. While this standard needs simplification and automation, we strongly suggest developing a guideline for reporting rather than enforceable standards.
	No
	The DOE OE-417 report should not supplement the NERC report due to the fact that the majority of reportable events are defined in/come from the OE-417 report. The NERC reporting form should be based on the OE-417 report and then include additional reporting requirements defined by NERC. However, it does not make sense to require reporting to the governmental agencies through enforceable NERC standards. The governmental agencies already have legal authority to compel reporting.
	While we are not opposed to the concept of identifying impact events, we are concerned that the drafting team may actually be expanding reporting requirements. We do not support expansion of reporting requirements unless a clear

	reliability or legal need is identified. Some of the impact events are almost never sabotage and do not warrant reporting for reliability needs and should not be included. For example, copper theft should not require reporting, in general, because it is almost never sabotage and rarely impacts reliability. If it does impact reliability because, for example, the protection system is impacted and causes more significant potential contingencies, then reporting could be required. Why is a train derailment near a transmission right of way significant? It would only be significant if an investigation identified sabotage as the reason. Furthermore, what is considered near?
	Group
	Midwest ISO Standards Collaborators
	Midwest ISO
	Yes
	We agree that it makes sense to build upon existing documentation. However, we do not believe it is necessary to require event reporting to be in an enforceable standard. Rather the drafting team should consider developing a reporting guideline document and retiring the EOP-004 standard. This is further supported by the fact that there is a role in the existing standard for the Regional Entities even though these requirements can't be enforced against the Regional Entities because they are not a user, owner or operator of the system.
	No
	We do not agree with developing a hierarchy for reporting for all disturbances and impacting events. For instance, copper theft is an example of an item that should be reported to the appropriate entities directly by the Transmission Owner. The RC does not need to be made aware of every copper theft unless it has a direct impact on reliability (affects rating, protection system, etc.) and the RC should not be burdened with expending resources for this reporting. A further example in which the hierarchy is not needed would be the case in which only one entity is impacted. If a significant event occurs on one TOP's system, then the TOP should be able to handle the reporting of all entities under its purview.. If more than one TOP is involved, then it would be necessary to involve the RC in the reporting.
	Yes
	We agree with the goal of having a single report form but believe there will be a significant challenge to get varying governmental agencies to agree on single report format.
	No
	It certainly makes sense to eliminate duplication in reporting and to allow supplemental information to be submitted in other reports. However, it does not make sense to require reporting to other governmental agencies through NERC enforceable NERC standards. Those governmental agencies already have legal authority to compel reporting. Again, we support developing a guideline for reporting rather than enforceable standards. The guideline could certainly explain the various reporting requirements and supplemental reporting requirements mentioned in the question without causing the issues we have identified in our comments.
	No
	We agree with the idea of identifying impact events but do not support the requirement for these to be always reported through the hierarchical structure identified in question 2. If an impact event only affects one entity, that entity should have the reporting requirement.
	
	While we are not opposed to the concept of identifying impact events, we are concerned that the drafting team may actually be expanding reporting requirements. We do not support expansion of reporting requirements unless a clear reliability or legal need is identified. Some of the impact events are almost never sabotage and do not warrant reporting for reliability needs and should not be included. For example, copper theft should not require reporting, in general, because it is almost never sabotage and rarely impacts reliability. If it does impact reliability because, for example, the protection system is impacted and causes more significant potential contingencies, then reporting could be required. Why is a train derailment near a transmission right of way significant? It would only be significant if an investigation identified sabotage as the reason. Furthermore, what is considered near?
	Group
	FirstEnergy
	FirstEnergy Corp.
	Yes
	This guideline appears to be a good starting point for developing consistency in reporting. However, we believe that after-the-fact event reporting is administrative in nature and seldom rises to the level of mandated reliability standard requirements. It is not clear what reporting would be made through this effort and how it differs from reporting made through the NERC Reliability Coordinator Information System (RCIS). With the initiative for more results-based standards being the goal of NERC, true after the fact reporting-type requirements should become administrative procedures and only be included in standards if they are truly required for preserving an Adequate Level of Reliability. If there are aspects that rise to be retained in a mandatory and enforceable reliability standard, we propose that those associated with sabotage be moved to CIP-001 and that EOP-004 be focused on operational disturbances that warrant a wide area knowledge. However, if the RCIS is the mechanism to convey real-time information and that is presently occurring outside of reliability standards, it is unclear what the delta improvement this project aims to achieve.

	No
	While we appreciate the team's effort to serialize the reporting process, with the electronic communication methods available today, it seems that reporting can be accomplished simultaneously to multiple entities without shifting the burden of reporting to others along the communications path. This is particularly true if the reporting format is standardized to a one-size-fits-all report. Additionally, it would be a great burden to the Reliability Coordinator to review all events perceived by entities to be malicious sabotage events.
	No
	While one consistent form for reporting may simplify reporting requirements, it would be very difficult to get all governmental agencies to agree to a one-size-fits all approach.
	Yes
	We agree that the simplification and consistency of reporting will improve the reporting of this information. We support the drafting team's efforts in this area and hope that all regulatory agencies will as well. However, as we have mentioned in our other comments, the reporting requirements should not be in a reliability standard unless they are proven to be necessary to maintain an Adequate Level of Reliability of the BES. Reporting of these events should be required by NERC in arenas outside of the standards.
	Yes
	The concept paper makes good progress in this area and the drafting team is on the right track, and agree that better clarity needs to be developed surrounding sabotage events. However, some of the examples stated in the paper are too vague and do not address extenuating circumstances or reasons for the events. One example sighted in the paper is "Bolts removed from transmission line structures." This statement may be too broad. For instance, if the bolts are removed from the tower and the organization is not experiencing a labor dispute, it could be considered a sabotage event with wide area implications. However, if the organization is in the middle of a labor dispute, this would be vandalism and would most likely not be of a wide area concern. Also, the number and location of towers affected could be an important determination related to the risk the event imposes on the Bulk Electric System.
	We fully agree that sabotage events need to be more clearly defined and reporting requirements need to be better coordinated. But as we have stated in previous comments, the drafting team needs to determine if standard requirements need to be developed for this type of reporting or if this is better left to administrative requirements outside the standards arena. Also, while we appreciate the team's effort to simplify reporting requirements for entities, we are concerned with the serial communication offered by the concept paper. As an example, the team proposes to have LSE report the incident to the BA and/or TOP and then have the BA and/or TOP report it to the RC and the RC to report it to NERC and the NERC report to the regulatory agencies. While this simplifies it for each individual organization, this method introduces many opportunities for errors and miscommunications. Since this is after-the-fact reporting, it is difficult to defend this type of communication path when one consistent report could be sent simultaneously to all agencies at the same time from the originating location.
	Individual
	Dan Rochester
	Independent Electricity System Operator
	Yes
	Yes
	We do not agree with the need of such a hierarchy setup solely for the purpose of making reports to the need-to-know entities. All responsible entities (RC, BA, TOP, etc.) need to file a report. With the proposed set up noted under Q3, which we support, these reports should go directly to NERC. The RC should not be held responsible for forwarding other entities' reports to NERC, and in doing so subject itself to potential non-compliance.
	Yes
	Yes, this will simplify the reporting effort. NERC may forward the reports to the other need-to-know entities.
	Yes
	We support this concept since it works well for those entities that are not required to file reports with the US agencies, e.g. the DOE.
	Yes
	We agree with the general concept. However, we suggest that the classification of "events" to be compatible if not identical to those which need to be reported in real time as required in CIP-001, for otherwise it will create confusion and unnecessary, extra work. Also, this proposal appears to focus on the sabotage-type events only but the SAR deals with both sabotage and other disturbances (e.g. emergency type of events) reporting. A parallel type of "impact event" is needed for non-sabotage-type of events.
	In the Background Section of the comment form, it is indicated that the SDT "...is NOT seeking input or guidance on the definition of physical or cyber sabotage, what type of disturbances should be reported, who should do reporting, or to whom or what organizations will be receiving the reports." Yet there are proposed definitions, with examples, in the concept paper. The SDT should make it absolutely clear that by supporting the general concept as described in

	the paper, the commenting entities are not endorsing the proposed definitions, nor the examples as elements to be included in the standard.
	Individual
	Roger Champagne
	Hydro-Québec TransÉnergie (HQT)
	Yes
	In considering guidance found in the document "NERC Guideline: Threat and Incident Reporting", the SDT should maintain focus on only those items that are absolutely necessary to maintain the reliability of the Bulk Electric System. In fact, the purpose of reporting per EOP-004 is that disturbances... need to be studied and understood to minimize the likelihood of similar events in the future.
	Yes
	Having the reporting flow through the Reliability Coordinator supports the reliability objective of assessing, monitoring, and maintaining a wide-area view of the reliability of the Bulk Electric System. The reporting hierarchy should be to submit the information to the Reliability Coordinator, and to have the RC submit the report. This would eliminate the duplication of information.
	Yes
	We agree with the concept that there should be one report form for all functional entities (whether located in the US, Canada, Mexico) for use in reporting to NERC. This would provide for a consistent reporting format across the continent.
	Yes
	We agree with the objective of eliminating duplicate reporting. However, EOP-004 currently allows substitution of DOE OE-417 in place of the NERC Interconnection Reliability Operating Limit and Preliminary Disturbance Report. As suggested in the Concept Paper, entities meeting the criteria of OE-417 are still obligated to file a report with DOE. Given that and the fact that CIP-001 requires no actual reporting, it is not clear where duplication exists today. We agree with the recommendation to eliminate the need for filing duplicate reports such as the DOE form OE-417. There is no benefit with regard to CIP-001 in filing separate reports. Duplicate reports introduce the potential for incomplete information to be supplied to responsible parties. Removing jurisdictional agencies from the Standard, and having NERC provide either query or situational awareness to those agencies being considered, might not be easy to achieve. There is an obligation under law to require entities to report to the DOE on the OE-417 form as amended or modified. This might drive the "omitted" agencies to have reporting laws enacted as well.
	No
	We believe that physical and cyber events must be investigated before a determination of sabotage or impact event can be made. The purpose of the NERC Standards is to maintain the reliability of the BES. Therefore, impact events should define or clarify the circumstances that would or could affect reliability. Reportable items should be based on impact to reliability, not on 'newsworthy' events or to gather information for trending. It is the law enforcement industry's responsibility to make a determination of "sabotage" or other. This determination cannot definitively be made by industry personnel, there is no expertise or time to investigate causes. It is the industry's job to mitigate effects. Examples would help provide for better guidance/direction. Industry examples would be welcomed to help reinforce developed internal processes for compliance.
	SERC and RFC are developing additional requirements at this time. We suggest that reporting be based on impact to reliability, not on 'newsworthy' events. We therefore do not agree with such regional efforts and would prefer a continent wide reporting requirement.
	a. NERC should focus efforts on developing specific event reporting criteria and not base the requirement on the definition of the term 'sabotage', but on the reporting criteria itself. See comments above. b. The "opportunities for efficiency" discussed in the Concept Paper would be best achieved by focusing on those items that are absolutely necessary to maintain the reliability of the Bulk Electric System. If there are elements that need to be reported that do not support this objective, then that reporting should not be required in reliability standards. Consider making NERC the distributor of reports to other agencies. We recognize that the key is to simplify reporting to a single form, and to the extent possible, to one agency. "Front line" reliability personnel must have the "timely" knowledge to know when a situation warrants local, area, regional, or national involvement. Finally, the SDT should keep in mind the fact that Canadian stakeholders might have some difference in the way reports are made to Security Agencies.