Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

Development Steps Completed

1. SC approved SAR for initial posting (April, 2009).
2. SAR posted for comment (April 22 – May 21, 2009).
3. SC authorized moving the SAR forward to standard development (September 2009).
4. Concepts Paper posted for comment (March 17 – April 16, 2010).

Proposed Action Plan and Description of Current Draft

This is the first posting of the proposed standard in accordance with Results-Based Criteria. The drafting team requests posting for a 30-day formal comment period.

Future Development Plan

Anticipated Actions	Anticipated Date
Initial Comment Period	September 2010
Drafting team considers comments, makes conforming changes, and proceed to second comment	October – December 2010
Comment Period/Initial Ballot	December 2010-January 2011
Successive Comment/Ballot period	February – March 2011
Receive BOT approval	April 2011

Effective Dates

1. USA: First calendar day of the first calendar quarter one year after applicable regulatory authority approval for all requirements

2. Canada and Mexico: First calendar day of the first calendar quarter one year following Board of Trustees adoption unless governmental authority withholds approval

Version History

Version	Date	Action	Change Tracking
2		Merged CIP-001-1 and EOP-004-1 into EOP-004-2; Retired EOP-004-1, R1, R3.2, R3.3, R3.4, R4, R5 and associated measures, evidence retention and VSLs. Added new requirements for ERO – R1, R7, R8.	Revision to entire standard (Project 2009-01)

Definitions of Terms Used in Standard

This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.

None

When this standard has received ballot approval, the text boxes will be moved to the Guideline and Technical Basis Section.

Introduction

1. Title: Impact Event and Disturbance Assessment, Analysis, and Reporting

2. Number: EOP-004-2

3. Purpose: Responsible Entities shall report impact events and their known causes to support situational awareness and the reliability of the Bulk Electric System (BES).

4. Applicability

4.1. Functional Entities:

4.1.1. Reliability Coordinator

4.1.2. Balancing Authority

4.1.3. Transmission Owner

4.1.4. Transmission Operator

4.1.5. Generator Owner

4.1.6. Generator Operator

4.1.7. Distribution Provider

4.1.8. Electric Reliability Organization

5. Background:

NERC established a SAR Team in 2009 to investigate revisions to the CIP-001 and EOP-004 Reliability Standards.

1. CIP-001 may be merged with EOP-004 to eliminate redundancies.
2. Acts of sabotage have to be reported to the DOE as part of EOP-004.
3. Specific references to the DOE form need to be eliminated.
4. EOP-004 has some 'fill-in-the-blank' components to eliminate.

The development may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards (see tables for each standard at the end of this SAR for more detailed information).

The SAR for Project 2009-01, Disturbance and Sabotage Reporting was moved forward for standard drafting by the NERC SC in August of 2009. The Disturbance and Sabotage Reporting Standard Drafting Team (DSR SDT) was formed in late 2009. A "concepts paper" was designed

to solicit stakeholder input regarding the proposed reporting concepts that the DSR SDT has developed.

The concept paper sought comments from stakeholders on the "road map" that will be used by the SDR SDT in updating or revising CIP-001 and EOP-004. The concept paper provided stakeholders the background information and thought process of the SDR SDT.

The DSR SDT has reviewed the existing standards, the SAR, issues from the NERC database and FERC Order 693 Directives in order to determine a prudent course of action with respect to these standards.

The DSR SDT has proposed the following concept for ***impact event***:

> *An impact event is any event that has either impacted or has the potential to impact the reliability of the Bulk Electric System. Such events may be caused by equipment failure or mis-operation, environmental conditions, or human action.*

To support this concept, the DSR SDT has provided specific event for reporting including types of impact events and timing thresholds pertaining to the different types of impact events and who's responsibility for reporting under the different impact events. This information is outlined in Attachment 1 to the proposed standard.

The DSR SDT wishes to make clear that the proposed changes do not include any real-time operating notifications for the types of events covered by CIP-001, EOP-004. This is achieved through the RCIS and is covered in other standards (e.g. TOP). The proposed standard deals exclusively with after-the-fact reporting.

The DSR SDT is proposing to consolidate disturbance and impact event reporting under a single standard. These two components and other key concepts are discussed in the following sections.

Summary of Concepts

- A single form to report disturbances and impact events that threaten the reliability of the bulk electric system
- Other opportunities for efficiency, such as development of an electronic form and possible inclusion of regional reporting requirements
- Clear criteria for reporting
- Consistent reporting timelines
- Clarity around of who will receive the information and how it will be used

Requirements and Measures

R1. The ERO shall establish, maintain and utilize a system for receiving and distributing impact event reports, received pursuant to Requirement R6, to applicable government, provincial or law enforcement agencies and Registered Entities to enhance and support situational awareness.

M1. The ERO shall provide evidence that it established, maintained and utilized a system for the distribution of the reports it receives to the various organizations or agencies. Such evidence could include, but is not limited to, dated records indicating that reports were distributed as shown on the submitted report or electronic logs indicating distribution of reports. (R1)

Rationale for R1

The goal of the DSR SDT is to have a generic reporting form and a system for all functional entities (US, Canada, Mexico) to submit impact event reports to NERC and other entities. Ultimately, it may make sense to develop an electronic version of the form to expedite completion, sharing and storage. Ideally, entities would complete a single electronic form on-line which could then be electronically forwarded or distributed to jurisdictional agencies and functional entities as appropriate using check boxes or other coding within the electronic form. Specific reporting forms that exist today (i.e. - OE-417, etc) could be included as part of the electronic form to accommodate US entities with a requirement to submit the form or may be removed (but still be mandatory for US entities under Public Law 93-275) to streamline the proposed consolidated reliability standard for all North American entities (US, Canada, Mexico). Jurisdictional agencies may include DHS, FBI, NERC, RE, FERC, Provincial Regulators, and DOE. Functional entities may include the RC, TOP, and BA for situational awareness. Applicability of the standard will be determined based on the specific requirements.

The DSR SDT recognizes that some regions require reporting of additional information beyond what is in EOP-004. The DSR SDT is planning to update the listing of reportable events from discussions with jurisdictional agencies, NERC, Regional Entities and stakeholder input. There is a possibility that regional differences may still exist.

Responsible entities will ultimately be responsible for ensuring that OE-417 reports are received at the DOE.

R2. Each Applicable Entity identified in Attachment 1 shall have an Operating Plan(s) for identifying, assessing and reporting impact events listed in Attachment 1 that includes the following components:

2.1. Method(s) for identifying impact events

2.2. Method(s) for assessing cause(s) of impact events

2.3. Method(s) for making internal and external notifications pursuant to Parts 2.5 and 2.6

2.4. List of internal company personnel responsible for making initial notification(s) pursuant to Parts 2.5.and 2.6.

2.5. List of internal company personnel to notify

2.6. List of external organizations to notify to include but not limited to NERC, Regional Entity, Law Enforcement, and Governmental or Provincial Agencies.

2.7. Method(s) for updating the Operating Plan when there is a component change within 30 days of the notification of the change.

2.8. A provision for updating the Operating Plan based on lessons learned from an exercise or implementation of the Operating Plan within 30 days of identifying the lessons learned.

2.9. A provision for updating the Operating Plan based on applicable lessons learned from the annual NERC report issued pursuant to Requirement R8 within 30 days of NERC publishing lessons learned.

M2. Each Applicable Entity shall provide the current in force Operating Plan to the Compliance Enforcement Authority upon request. (R2)

Rationale for R2

Every industry participant that owns or operates elements or devices on the grid has a formal or informal process, procedure, or steps it takes to assess what happened and why it happened when impact events occur. This requirement has the Registered Entity establish documentation on how that procedure, process, or plan is organized.

For the Operating Plan, the DSR SDT envisions that "assessing" includes performing sufficient analysis to be able to complete the report for reportable impact events. The main issue is to make sure an entity can a) identify when an impact event has occurred and b) be able to gather enough information to complete the report.

Parts 3.3 and 3.4 include, but not limited to, operating personnel who could be involved with any aspect of the operating plan.

The Operating Plan may include, but not be limited to, the following: how the entity is notified of event's occurrence, person(s) initially tasked with the overseeing the assessment or analytical study, investigatory steps typically taken, and documentation of the assessment / remedial action plan.

R3. Each Applicable Entity shall identify and assess initial probable cause of impact events listed in Attachment 1 in accordance with its Operating Plan documented in Requirement R2.

M3. To the extent that an Applicable Entity has an impact event on its Facilities, the Applicable Entity shall provide documentation of its assessment or analysis. Such evidence could include, but is not limited to, operator logs, voice recordings, or power flow analysis cases. (R3)

Rationale for R3
The DSR SDT intends for each Applicable Entity to assess the causes of the reportable impact event and gather enough information to complete the report that is required to be filed.

R4. Each Applicable Entity shall conduct a drill, exercise, or Real-time implementation of its Operating Plan for reporting created pursuant to Requirement R2 at least annually, with no more than 15 months between exercises or actual use.

M4. The Applicable Entity shall provide evidence that it conducted a drill, exercise or Real-time implementation of the Operating Plan for reporting as specified in the requirement. Such evidence could include, but is not limited to, a dated, exercise scenario with notes on the exercise or operator logs, voice recordings, or power flow analysis cases for an actual implementation of the Operating Plan. (R4)

Rationale for R4
The DSR SDT intends for each Applicable Entity to conduct a drill or exercise of it Operating Plan as often as merited but no longer than 15 months from the previous exercise to prevent a long cycle of exercises (i.e., conducting an exercise in January of one year and then December of the next year). Multiple exercises in a 15 month period is not a violation of the requirement and would be encouraged to improve reliability. A drill or exercise may be a table-top exercise, a simulation or an actual implementation of the Operating Plan.

R5. Each Applicable Entity shall provide training to all internal personnel identified in its Operating Plan for reporting pursuant to Requirement R2 subject to the following:

5.1 The training includes the personnel required to respond and their required actions under the Operating Plan.

5.2 Training conducted at least once per calendar year, with no more than 15 months between training sessions for personnel with existing responsibilities.

5.3 If the Operating Plan is revised (with the exception of contact information revisions), training shall be conducted within 30 days of the Operating Plan revisions.

5.4 For internal personnel added to the Operating Plan or those with revised responsibilities under the Operating Plan, training shall be conducted prior to assuming the responsibilities in the plan.

Rationale for R5

The SDT is not prescribing how training is to be conducted and leaves that decision to each Applicable Entity as they best know how to conduct such activities. Conduct of an exercise constitutes training for compliance with this requirement.

For changes to the Operating Plan (5.3), the training may simply consist of a review of the revised responsibilities and a "sign-off" that personnel have reviewed the revisions.

M5. Applicable Entities shall provide the actual training material presented to verify content and the association between the people listed in the plan and those who participated in the training, documentation showing who was trained and when internal personnel were trained on the responsibilities in the Operating Plan as well as dates for personnel changes and evidence that the training was conducted following personnel changes. (R5)

R6. Each Applicable Entity shall report impact events in accordance with its Operating Plan created pursuant to Requirement R2 and the timelines outlined in Attachment 1.

M6. Registered Entities shall provide evidence demonstrating the submission of reports using the Operating Plan created pursuant to Requirement R2 for impact events. Such evidence will include a copy of the original impact event report submitted, evidence to support the type of impact event experienced; the date and time of the impact event ; as well as evidence of report submittal that includes date and time. (R6)

R7. The ERO shall annually review and propose revisions to the impact event table (Attachment 1) if warranted based on its analysis of reported impact events. Revisions to Attachment 1 shall follow the Reliability Standards Development Procedure.

M7. The ERO shall provide evidence that it reviewed the impact event table. If applicable, the ERO shall provide evidence that it followed the Reliability Standards Development Procedure to propose and implement revisions to Attachment 1. Such evidence may include, but not be limited to, documentation that compares or assesses the list of impact events (Attachment 1) against the analysis of reported impact events. (R7)

Rationale for R7-R8

Some of the concepts contained in Requirements R7 and R8 are contained in the NERC Rules of Procedure, section 800. The DSR SDT felt that, in order to have a complete standard for reporting impact events that improved reliability, there needed to be feedback to industry on a regular basis as well as when issues are discovered. The analysis of impact events is crucial and the subsequent dissemination of the results of that analysis must be performed.

In accordance with Sections 401(2) and 405 of the Rules of Procedures, the ERO can be set as an applicable entity in a requirement or standard. After careful consideration, the DSR SDT believes that these requirements (R7-8) are best applicable to the ERO.

R8. The ERO shall publish a quarterly report of the year's reportable impact events subject to the following:

8.1 Issued no later than 30 days following the end of the calendar quarter

8.2 Identifies trends on the BES

8.3 Identifies threats to the BES

8.4 Identifies other vulnerabilities to the BES

8.5 Documents lessons learned

8.6 Includes recommended actions.

Rationale for R8

The ERO will analyze Impact Events that are reported through requirement R6. The DSR SDT envisions the ERO issuing reports identifying trends, threats or other vulnerabilities when available or at least quarterly. The report will include lessons learned and recommended actions (such as mitigation plans) to improve reliability as applicable.

M8. The ERO shall provide evidence that it issued a report identifying trends, threats, or other vulnerabilities on the bulk electric system at least quarterly. Such evidence will include a copy of the report as well as dated evidence of the report's issuance. (R8)

Compliance

Compliance Enforcement Authority

- Regional Entity
- For requirements applicable to the ERO, an entity contracted to perform an audit.

Compliance Monitoring and Enforcement Processes:

- Compliance Audits
- Self-Certifications
- Spot Checking
- Compliance Violation Investigations
- Self-Reporting
- Complaints

Evidence Retention

Each Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Owner, Generator Operator and Distribution Provider shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

The ERO shall retain evidence of Requirements 1, 7 and 8, Measures 1, 7, and 8 for three calendar years.

Each Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Owner, Generator Operator and Distribution Provider shall retain data or evidence of Requirements 2, 3, 4, and 5 and Measures 2, 3, 4, and 5 for three calendar years for the duration of any regional investigation, whichever is longer to show compliance unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

Each Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Owner, Generator Operator and Distribution Provider shall retain data or evidence of Requirement 6 and Measure 6 for three calendar years for the duration of any regional investigation, whichever is longer to show compliance unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If a Registered Entity is found non-compliant, it shall keep information related to the non-compliance until found compliant or for the duration specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

Additional Compliance Information

To be determined.

Variances

None

Interpretations

None

EOP-004 - Attachment 1: Impact Events Table

NOTE: Under certain adverse conditions, e.g., severe weather, it may not be possible to assess the damage caused by an impact event and issue a written Impact Event Report within the timing in the table below. In such cases, the affected Applicable Entity shall notify its Regional Entity(ies) and NERC, and verbally provide as much information as is available at that time. The affected Applicable Entity shall then provide periodic verbal updates until adequate information is available to issue a written Preliminary Impact Event Report.

EOP-004 – Attachment 1 - Actual Reliability Impact – Part A			
Event	**Entity with Reporting Responsibility**	**Threshold for Reporting**	**Time to Submit Report**
Energy Emergency requiring Public appeal for load reduction	RC, BA	To reduce consumption in order to maintain the continuity of the BES Each public appeal for load reduction	Within 1 hour of issuing a public appeal
Energy Emergency requiring system-wide voltage reduction	RC, TO, TOP, DP	System wide voltage reduction of 3% or more	Within 1 hour after occurrence is identified
Energy Emergency requiring firm load shedding	RC, BA, TOP, DP	Firm load shedding ≥ 100 MW (manually or via automatic undervoltage or underfrequency load shedding schemes, or SPS/RAS)	Within 24 hours after occurrence
Voltage Deviations	RC, TOP, GOP	± 10% sustained for ≥ 15 minutes	Within 24 hours after 15 minute threshold
Frequency Deviations	RC, BA	± Deviations ≥ than Frequency Trigger Limit (FTL) more than 15 minutes	Within 24 hours after 15 minute threshold
IROL Violation	RC, TOP	Operate outside the IROL for time greater than IROL Tv	Within 24 hours after Tv threshold
Loss of Firm load for ≥ 15 Minutes	RC, BA, TO, TOP, DP	• ≥ 300 MW for entities with previous year's demand ≥ 3000 MW • ≥ 200 MW for all other entities	Within 24 hours after 15 minute thresh
System Separation (Islanding)	RC, BA, TOP, DP	Each separation resulting in an island of generation and load ≥ 100 MW	Within 1 hour after occurrence is identified
Generation loss	RC, BA, GO, GOP	• ≥ 2,000 MW for entities in the Eastern or Western Interconnection	Within 24 hours after occurrence

EOP-004 – Attachment 1 - Actual Reliability Impact – Part A			
Event	**Entity with Reporting Responsibility**	**Threshold for Reporting**	**Time to Submit Report**
		• ≥ 1000 MW for entities in the ERCOT or Quebec Interconnection • An entire generating station of ≥ 5 generators with aggregate capacity of ≥ 500 MW	
Transmission loss	RC, TO, TOP	• An entire DC converter station • Multiple BES transmission elements (simultaneous or common-mode event)	Within 24 hours after occurrence
Damage or destruction of BES equipment[1]	RC, BA, TO, TOP, GO, GOP, DP	Through operational error, equipment failure, or external cause	Within 1 hour after occurrence is identified

Examples:

a. BES equipment that is:
   i. A critical asset
   ii. Affects an IROL
   iii. Significantly affects the reliability margin of the system e.g., has the potential to result in the need for emergency actions
   iv. Damaged or destroyed due to a non-environmental external cause

b. Report copper theft from BES equipment only if it degrades the ability of equipment to operate correctly e.g., removal of grounding straps rendering protective relaying ineffective

EOP-004 – Attachment 1 - Potential Reliability Impact – Part B			
Event	**Entity with Reporting Responsibility**	**Threshold for Reporting**	**Time to Submit Report**
Unplanned Control Center evacuation	RC, BA, TOP	Unplanned evacuation from BES control center facility	report within 1 hour after occurrence
Fuel supply emergency	RC, BA, GO, GOP	Affecting BES reliability[1]	report within 1 hour after occurrence
Loss of off-site power (grid supply)	RC, BA, TO, TOP, GO, GOP	Affecting a nuclear generating station	report within 1 hour after occurrence
Loss of all monitoring or voice communication capability	RC, BA, TOP	Affecting a BES control center for ≥ 30 minutes	report within 1 hour after occurrence
Forced intrusion[2]	RC, BA, TO, TOP, GO, GOP	At a BES facility	report within 24 hours after occurrence
Risk to BES equipment[3]	RC, BA, TO, TOP, GO, GOP, DP	From a non-environmental physical threat	report within 24 hours after occurrence
Detection of a cyber intrusion to critical cyber assets	RC, BA, TO, TOP, GO, GOP, DP	That meets the criteria in CIP-008 (or its successor)	report within 24 hours after occurrence

1. Report if problems with the fuel supply chain result in the projected need for emergency actions to manage reliability.
2. Report if you cannot reasonably determine likely motivation (i.e., intrusion to steal copper or spray graffiti is not reportable unless it effects the reliability of the BES).
3. Examples include a train derailment adjacent to BES equipment, that either could have damaged the equipment directly or has the potential to damage the equipment (e.g. flammable or toxic cargo that could pose fire hazard or could cause evacuation of a BES facility control center).

EOP-002 - Attachment 2: Impact Event Reporting Form

EOP-004 – Confidential Impact Event Report		
	Task	**Comments**
1.	Entity filing the report (include Compliance Registration ID number):	
2.	Date and Time of impact event. Date: (mm/dd/yy) Time/Zone:	
3.	Name of contact person: Email address: Telephone Number:	
4.	Did the impact event originate in your system?	Yes ☐ No☐
5.	Under which NERC function are you reporting?	
6.	Brief Description of impact event: (More detail should be provided in the Sequence of Events section below.)	

EOP-004 – Confidential Impact Event Report			
	Task	**Comments**	
7.	Generation tripped off-line. MW Total List units tripped		
8.	Frequency. Just prior to impact event (Hz): Immediately after impact event (Hz max): Immediately after impact event (Hz min):		
9.	List transmission facilities (lines, transformers, buses, etc.) tripped and locked-out. (Specify voltage level of each facility listed).		
10.	Demand tripped (MW): Number of affected customers: Demand lost (MW-Minutes):	FIRM	INTERRUPTIBLE

EOP-004 – Confidential Impact Event Report			
	Task	**Comments**	
11.	Restoration Time.	INITIAL	FINAL
	Transmission:		
	Generation:		
	Demand:		
12.	Sequence of Events:		
13.	Identify the initial probable cause or known root cause of the impact event:		

EOP-004 – Confidential Impact Event Report		
	Task	**Comments**
14.	Identify any protection system misoperation(s):	
15.	Additional Information that the helps to further explain the event if needed. A one-line diagram may be attached, if readily available, to assist in the evaluation of the event.:	

Guideline and Technical Basis

Disturbance and Sabotage Reporting Standard Drafting Team (Project 2009-01) - Reporting Concepts

Introduction

The SAR for Project 2009-01, Disturbance and Sabotage Reporting was moved forward for standard drafting by the NERC Standards Committee in August of 2009. The Disturbance and Sabotage Reporting Standard Drafting Team (DSR SDT) was formed in late 2009 and is progressing toward developing standards based on the SAR. This concepts paper is designed to solicit stakeholder input regarding the proposed reporting concepts that the DSR SDT has developed.

The standards listed under the SAR are:

- CIP-001 — Sabotage Reporting
- EOP-004 — Disturbance Reporting

The DSR SDT also proposed to investigate incorporation of the cyber incident reporting aspects of CIP-008 under this project. This will be coordinated with the Cyber Security - Order 706 SDT (Project 2008-06).

The DSR SDT has reviewed the existing standards, the SAR, issues from the NERC database and FERC Order 693 Directives to determine a prudent course of action with respect to these standards.

This concept paper provides stakeholders with a proposed "road map" that will be used by the DSR SDT in updating or revising CIP-001 and EOP-004. This concept paper provides the background information and thought process of the DSR SDT.

The proposed changes do not include any real-time operating notifications for the types of events covered by CIP-001 and EOP-004. The real-time reporting requirements are achieved through the RCIS and are covered in other standards (e.g. EOP-002-Capacity and Energy Emergencies). The proposed standards deal exclusively with after-the-fact reporting.

The DSR SDT is proposing to consolidate disturbance and event reporting under a single standard. These two components and other key concepts are discussed in the following sections.

Summary of Concepts and Assumptions:

The Standard Will: Require use of a single form to report disturbances and "impact events" that threaten the reliability of the bulk electric system

- Provide clear criteria for reporting
- Include consistent reporting timelines
- Identify appropriate applicability, including a reporting hierarchy in the case of disturbance reporting
- Provide clarity around of who will receive the information

The drafting team will explore other opportunities for efficiency, such as development of an electronic form and possible inclusion of regional reporting requirements

Discussion of Disturbance Reporting
Disturbance reporting requirements currently exist in EOP-004. The current approved definition of Disturbance from the NERC Glossary of Terms is:

1. An unplanned event that produces an abnormal system condition.
2. Any perturbation to the electric system.
3. The unexpected change in ACE that is caused by the sudden failure of generation or interruption of load.

Disturbance reporting requirements and criteria are in the existing EOP-004 standard and its attachments. The DSR SDT discussed the reliability needs for disturbance reporting and developed the list of impact events that are to be reported under this standard (attachment 1).

Discussion of "impact event" Reporting
There are situations worthy of reporting because they have the potential to impact reliability. The DSR SDT proposes calling such incidents 'impact events' with the following concept:

> An impact event is any situation that has the potential to significantly impact the reliability of the Bulk Electric System. Such events may originate from malicious intent, accidental behavior, or natural occurrences.

Impact event reporting facilitates situational awareness, which allows potentially impacted parties to prepare for and possibly mitigate the reliability risk. It also provides the raw material, in the case of certain potential reliability threats, to see emerging patterns.

Examples of impact events include:

- Bolts removed from transmission line structures
- Detection of cyber intrusion that meets criteria of CIP-008 or its successor standard
- Forced intrusion attempt at a substation
- Train derailment near a transmission right-of-way
- Destruction of Bulk Electrical System equipment

What about sabotage?
One thing became clear in the DSR SDT's discussion concerning sabotage: everyone has a different definition. The current standard CIP-001 elicited the following response from FERC in FERC Order 693, paragraph 471 which states in part: *". . . the Commission directs the ERO to develop the following modifications to the Reliability Standard through the Reliability Standards development process: (1) further define sabotage and provide guidance as to the triggering events that would cause an entity to report a sabotage event."*

Often, the underlying reason for an event is unknown or cannot be confirmed. The DSR SDT believes that reporting material risks to the Bulk Electrical System using the impact event categorization, it will be easier to get the relevant information for mitigation, awareness, and tracking, while removing the distracting element of motivation.

The DST SDT discussed the reliability needs for impact event reporting and will consider guidance found in the document "NERC Guideline: Threat and Incident Reporting" in the development of requirements, which will include clear criteria for reporting.

Certain types of impact events should be reported to NERC, the Department of Homeland Security (DHS), the Federal Bureau of Investigation (FBI), and/or Provincial or local law enforcement. Other types of impact events may have different reporting requirements. For example, an impact event that is related to copper theft may only need to be reported to the local law enforcement authorities.

Potential Uses of Reportable Information
Event analysis, correlation of data, and trend identification are a few potential uses for the information reported under this standard. As envisioned, the standard will only require Functional entities to report the incidents and provide information or data necessary for these analyses. Other entities (e.g. – NERC, Law Enforcement, etc) will be responsible for performing the analyses. The NERC Rules of Procedure (section 800) provide an overview of the responsibilities of the ERO in regards to analysis and dissemination of information for reliability. Jurisdictional agencies (which may include DHS, FBI, NERC, RE, FERC, Provincial Regulators, and DOE) have other duties and responsibilities.

Collection of Reportable Information or "One stop shopping"
The goal of the DSR SDT is to have one reporting form for all functional entities (US, Canada, Mexico) to submit to NERC. Ultimately, it may make sense to develop an electronic version to expedite completion, sharing and storage. Ideally, entities would complete a single form which could then be distributed to jurisdictional agencies and functional entities as appropriate. Specific reporting forms[1] that exist today (i.e. - OE-417, etc) could be included as part of the

[1] The DOE Reporting Form, OE-417 is currently a part of the EOP-004 standard. If this report is removed from the standard, it should be noted that this form is still required by law as noted on the form: NOTICE: This report is mandatory under Public Law 93-275. Failure to comply may result in criminal fines, civil penalties and other sanctions as provided by law. For the sanctions and the provisions concerning the confidentiality of information submitted on this form, see General Information portion of the instructions. Title 18 USC 1001 makes it a criminal

electronic form to accommodate US entities with a requirement to submit the form, or may be removed (but still be mandatory for US entities under Public Law 93-275) to streamline the proposed consolidated reliability standard for all North American entities (US, Canada, Mexico). Jurisdictional agencies may include DHS, FBI, NERC, RE, FERC, Provincial Regulators, and DOE. Functional entities may include the RC, TOP, and BA for situational awareness. Applicability of the standard will be determined based on the specific requirements.

The DSR SDT recognizes that some regions require reporting of additional information beyond what is in EOP-004. The DSR SDT is planning to update the listing of reportable events from discussions with jurisdictional agencies, NERC, Regional Entities and stakeholder input. There is a possibility that regional differences may still exist.

The reporting proposed by the DSR SDT is intended to meet the uses and purposes of NERC. The DSR SDT recognizes that other requirements for reporting exist (e.g., DOE-417 reporting), which may duplicate or overlap the information required by NERC. To the extent that other reporting is required, the DSR SDT envisions that duplicate entry of information is not necessary, and the submission of the alternate report will be acceptable to NERC so long as all information required by NERC is submitted. For example, if the NERC Report duplicates information from the DOE form, the DOE report may be included or attached to the NERC report, in lieu of entering that information on the NERC report.

offense for any person knowingly and willingly to make to any Agency or Department of the United States any false, fictitious, or fraudulent statements as to any matter within its jurisdiction.