



NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Standards Announcement

30-Day Informal Comment Period Open

September 15 - October 15, 2010

Now available at: http://www.nerc.com/filez/standards/Project2009-01_Disturbance_Sabotage_Reporting.html

Project 2009-01 Disturbance and Sabotage Reporting

The Disturbance and Sabotage Reporting Standard Drafting Team is seeking comments on its preliminary draft of EOP-004-2 – Impact Event and Disturbance Assessment, Analysis, and Reporting **until 8 p.m. EDT on October 15, 2010.**

Transition from Reliability Standards Development Procedure Version 7 – to Standard Processes Manual

In accordance with the Standard Processes Manual approved by FERC on September 3, 2010, the drafting team is using an “informal” comment period to solicit stakeholder feedback. The new standard development process allows drafting teams to use informal comment periods. Unlike formal comment periods where a drafting team provides a response to each comment submitted, with informal comment periods the drafting team provides a summary response to each question asked on its comment form, but the team is not obligated to provide an individual response to each comment submitted. The summary response will indicate whether stakeholders support the proposal and will identify any additional changes made based on stakeholder comments. With informal comment periods drafting teams are not required to provide an individual response to each comment submitted. This change to the process is intended to give drafting teams more time to deliberate on technical issues, as opposed to deliberating on individual responses to comments. Note that while informal comment periods are allowed in the new standard process for preliminary drafts of proposed standards, formal comment periods are still required for the final draft of each standard.

Instructions

Please use this [electronic form](#) to submit comments. If you experience any difficulties in using the electronic form, please contact Monica Benson at monica.benson@nerc.net. An off-line, unofficial copy of the comment form is posted on the project page:

http://www.nerc.com/filez/standards/Project2009-01_Disturbance_Sabotage_Reporting.html

Next Steps

The drafting team will draft and post a summary response to the comments received and conforming revisions to the standard. The next will be either another 30-day informal comment period or a 30-day formal comment period on the complete standard.

Project Background

This project involves revising existing standards CIP-001-1 — Sabotage Reporting and EOP-004-1 — Disturbance Reporting to eliminate redundancies and provide clarity on sabotage events. The project will address several issues identified by stakeholders, as well as FERC directives from Order 693, including a directive to provide greater clarity to requirements associated with “sabotage.”

EOP-004-2 was drafted using the “results-based” criteria for developing a reliability standard. The results-based approach includes considerably more emphasis on the “concepts and assumptions” underlying the development of requirements and goes beyond the steps most drafting teams have previously used when developing a standard. Accordingly, the “look and feel” of a results-based standard is quite different than NERC’s existing standards. However, at the core is a set of mandatory and enforceable requirements with useful guidance supporting these requirements, an approach NERC’s legal counsel has reviewed and finds acceptable. More information about results-based standards can be found at:

http://www.nerc.com/filez/standards/Project2010-06_Results-based_Reliability_Standards.html

Standards Process

The [Standard Processes Manual](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance, please contact Monica Benson,
Standards Process Administrator, at monica.benson@nerc.net or at 609.452.8060*

North American Electric Reliability Corporation
116-390 Village Blvd.
Princeton, NJ 08540
609.452.8060 | www.nerc.com