Unofficial Comment Form

Project 2009-01 Disturbance and Sabotage Reporting

Please DO NOT use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=50c130c7e8e74f9aa29eb0380dac30c6) to submit comments on the draft standard EOP-004-2. Comments must be submitted by September 27, 2012**.** If you have questions please contact Stephen Crutchfield by email or by telephone at (609) 651-9455.

### Background Information

EOP-004-2 was posted for a 30-day formal comment period and successive ballot from April 25 through May 24, 2011. The DSR SDT received suggestions from stakeholders to improve the readability and clarity of the requirements of the standard. The revisions that were made to the standard are summarized in the following paragraphs. As a result of these revisions, the DSR SDT is posting the standard for a second successive ballot period.

The DSR SDT has developed EOP-004-2 to replace the current mandatory and enforceable EOP-004-1 and CIP-001-2a standards, therefore, retiring both EOP-004-1 and CIP-002-2a. The reporting obligations under EOP-004-2 serve to provide input to the NERC Events Analysis Program. Analysis of events is not required under the proposed standard and any analysis or investigation will fall under the Event Analysis Program under the NERC Rules of Procedure.

The following changes were made as a result of comment received in the last formal comment period and successive ballot:

1. The DSR SDT has removed reporting of Cyber Security Incidents from EOP-004 and has asked the team developing CIP-008-5 to retain this reporting. With this revision, the Interchange Coordinator, Transmission Service Provides, Load-Serving Entity, Electric Reliability Organization and Regional Entity were removed as Responsible Entities.
2. Most of the language contained in the “Background” Section was moved to the “Guidelines and Technical Basis” Section. Minor language changes were made to the measures and the data retention section. Attachment 2 was revised to list events in the same order in which they appear in Attachment 1.
3. Requirement R1 was revised to include the Parts in the main body of the Requirement. The Measure and VSLs were updated accordingly.
4. Following review of the industry’s comments, the SDT has re-examined the FERC Directive in Order 693 and has dropped both Requirement R4 and Requirement R5, and updated Requirement R3 to have the Registered Entity “validate” the contact information in the contact list(s) that they may have for the events applicable to them. This validation needs to be performed each calendar year to ensure that the list(s) have current and up-to-date contact data.

R3. Each Responsible Entity shall validate all contact information contained in the Operating Plan pursuant to Requirement R1 each calendar year. *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]"*

1. The SDT has also updated Attachment 1 based on comments received, FERC directives, and in consideration of what is required for combining CIP-001-2a and EOP-004-1 into EOP-004-2. Under the Event Column, the SDT starts to classify each type of an event by assigning an “Event Type” title. The DSR SDT then updated the “Entity with Reporting Responsibilities” column to simply state which entity has the responsibility to report if they experience an event. The last column, “Threshold for Reporting,” is a bright line that, if reached, the entity needs to report that they experienced the applicable event per Requirement 1.
2. The DSR SDT had previously proposed a revision to the NERC Rules of Procedure (Section 812). The SDT has learned that NERC has started a new effort to forward event reports to applicable government authorities. As such, Section 812 is no longer needed and will be removed from this project.

**Questions**

**You do not have to answer all questions.**

1. **The DSR SDT has revised EOP-004-2 by combining Requirements R3 and R4 into a single requirement (Requirement R3) to, “… validate all contact information contained in the Operating Plan pursuant to Requirement R1 each calendar year.” Do you agree with this revision? If not, please explain in the comment area below.**

[ ]  Yes

[ ]  No

Comments:

1. **The DSR SDT has revised the VSLs to reflect the language in the revised requirements. Do you agree with the proposed VRFs and VSLs? If not, please explain in the comment area below.**

[ ]  Yes

[ ]  No

Comments:

1. **Do you have any other comment, not expressed in the questions above, for the DSR SDT?**

Comments: