

## Standards Authorization Request Form

When completed, email this form to: Barbara.Nutter@nerc.net

For questions about this form or for assistance in completing the form, call Barb Nutter at 404-446-9692.

NERC welcomes suggestions for improving the reliability of the Bulk-Power System through improved Reliability Standards. Please use this form to submit your proposal for a new NERC Reliability Standard or a revision to an existing standard.

|                               | Request to     | propose a new or  | a revision                   | to a Reliability Standard    |  |
|-------------------------------|----------------|---|------------------------------|------------------------------|--|
| Proposed Standard:            |                | Project 2014-04 Physical Security Reliability Standard(s) |                              |                              |  |
| Date Submitted:               |                | March 12, 2014 (revised November 20, 2014)                |                              |                              |  |
| SAR Requester Information     |                |   |                              |                              |  |
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| Organization:                 | NERC Staff     |   |                              |                              |  |
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| SAR Type (Chec                | k as many as a | applicable)   |                              |                              |  |
| New Standard                  |                | ☐ Wit   | hdrawal of existing Standard |                              |  |
| Revision to existing Standard |                | Urg   | gent Action                  |                              |  |



**SAR Information** 

Industry Need (What is the industry problem this request is trying to solve?):

On March 7, 2014, FERC issued an order directing the ERO to develop a standard to address the physical security of critical facilities on the Bulk-Power System. In the order, FERC stated:

"The Commission directs the North American Electric Reliability Corporation (NERC), as the Commission-certified Electric Reliability Organization (ERO), to submit for approval one or more Reliability Standards that will require certain registered entities to take steps or demonstrate that they have taken steps to address physical security risks and vulnerabilities related to the reliable operation of the Bulk-Power System. The proposed Reliability Standards should require owners or operators of the Bulk-Power System, as appropriate, to identify facilities on the Bulk-Power System that are critical to the reliable operation of the Bulk-Power System. Then, owners or operators of those identified critical facilities should develop, validate and implement plans to protect against physical attacks that may compromise the operability or recovery of such facilities. The Commission directs NERC to submit the proposed Reliability Standards to the Commission within 90 days of the date of this order." Reliability Standards for Physical Security Measures, 146 FERC ¶ 61,166 at P 1 (2014) ("FERC Order").

In Order No. 802 (final order on CIP-014-1), issued on November 20, 2014, FERC directed NERC to remove the term "widespread" from Reliability Standard CIP-014-1 or, alternatively, to propose modifications to the Reliability Standard that address the Commission's concerns. FERC directed that NERC submit a responsive modification within six months from the effective date of this final rule.

## **SAR Information**

Purpose or Goal (How does this request propose to address the problem described above?):

The primary goal of this SAR is to allow the Standard Drafting Team (SDT) for Project 2014-04, Physical Security to develop a standard(s) to address the directives of the March 7, 2014 FERC Order, and to address the one directive in Order 802 on the removal of the term widespread or alternatively propose modifications that address the Commission concerns in Order 802, and to ensure consistency within the NERC body of Reliability Standards.

Identify the Objectives of the proposed standard's requirements (What specific reliability deliverables are required to achieve the goal?):

Provide clear, unambiguous requirements and standard(s) to address the directives in the March 7, 2014 FERC Order regarding the physical security of critical facilities on the Bulk-Power System, and to address the one directive in Order 802 on the removal of the term widespread or alternatively propose modifications that address the Commission concerns in Order 802.



**SAR Information** 

Brief Description (Provide a paragraph that describes the scope of this standard action.)

The SDT shall develop standard requirements, Violation Risk Factors, Violation Severity Levels, and implementation plan and shall work with compliance on an accompanying RSAW to address each of the directives in the March 7, 2014 FERC Order and to address the one directive in Order 802 on the removal of the term widespread or alternatively propose modifications that address the Commission concerns in Order 802.

Detailed Description (Provide a description of the proposed project with sufficient details for the standard drafting team to execute the SAR. Also provide a justification for the development or revision of the standard, including an assessment of the reliability and market interface impacts of implementing or not implementing the standard action.)

The SDTs execution of this SAR requires the SDT to address each of the FERC directives in the deadline required by the Order and to address the one directive in Order 802 on the removal of the term widespread or alternatively propose modifications that address the Commission concerns in Order 802. The reliability assessment and justification is also set forth in the March 7, 2014 FERC Order. The March 7, 2014 FERC Order is incorporated in its entirety into this SAR, so as not to unnecessarily repeat or paraphrase the substance of the Order. There are no market interface impacts resulting from the standard action on physical security.

|       | Reliability Functions             |   |
|-------|-----------------------------------|---|
| The S | tandard will Apply to the         | Following Functions (Check each one that applies.)  |
|       | Regional Reliability Organization | Conducts the regional activities related to planning and operations, and coordinates activities of Responsible Entities to secure the reliability of the Bulk Electric System within the region and adjacent regions. |
|       | Reliability Coordinator           | Responsible for the real-time operating reliability of its Reliability Coordinator Area in coordination with its neighboring Reliability Coordinator's wide area view.  |



Reliability Functions Integrates resource plans ahead of time, and maintains load-**Balancing Authority** interchange-resource balance within a Balancing Authority Area and supports Interconnection frequency in real time. Ensures communication of interchange transactions for reliability Interchange Authority evaluation purposes and coordinates implementation of valid and balanced interchange schedules between Balancing Authority Areas. **Planning Coordinator** Assesses the longer-term reliability of its Planning Coordinator Area. Develops a >one year plan for the resource adequacy of its specific loads Resource Planner within a Planning Coordinator area. Develops a >one year plan for the reliability of the interconnected Bulk Transmission Planner Electric System within its portion of the Planning Coordinator area. Administers the transmission tariff and provides transmission services **Transmission Service** under applicable transmission service agreements (e.g., the pro forma Provider tariff).  $\boxtimes$ **Transmission Owner** Owns and maintains transmission facilities. Transmission Ensures the real-time operating reliability of the transmission assets  $\boxtimes$ within a Transmission Operator Area. Operator **Distribution Provider** Delivers electrical energy to the End-use customer. **Generator Owner** Owns and maintains generation facilities. **Generator Operator** Operates generation unit(s) to provide real and reactive power. **Purchasing-Selling** Purchases or sells energy, capacity, and necessary reliability-related Entity services as required. Market Operator Interface point for reliability functions with commercial functions. Secures energy and transmission service (and reliability-related services) **Load-Serving Entity** to serve the End-use Customer.



|             | Reliability and Market Interface Principles  |                   |  |
|-------------|--|-------------------|--|
| Appl        | icable Reliability Principles (Check all that apply).  |                   |  |
|             | Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.   |                   |  |
|             | <ol><li>The frequency and voltage of interconnected bulk power systems shall be controlled defined limits through the balancing of real and reactive power supply and demandant.</li></ol>   |                   |  |
|             | <ol> <li>Information necessary for the planning and operation of interconnected bulk po<br/>shall be made available to those entities responsible for planning and operating<br/>reliably.</li> </ol>  | •                 |  |
|             | <ol> <li>Plans for emergency operation and system restoration of interconnected bulk possible shall be developed, coordinated, maintained and implemented.</li> </ol>  | ower systems      |  |
| $\boxtimes$ | 5. Facilities for communication, monitoring and control shall be provided, used and for the reliability of interconnected bulk power systems.  | d maintained      |  |
|             | 6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.   |                   |  |
|             | 7. The security of the interconnected bulk power systems shall be assessed, monito maintained on a wide area basis.  | ored and          |  |
|             | 8. Bulk power systems shall be protected from malicious physical or cyber attacks.   |                   |  |
|             | the proposed Standard comply with all of the following Market Interface ciples?  | Enter<br>(yes/no) |  |
| 1           | <ul> <li>A reliability standard shall not give any market participant an unfair competitive<br/>advantage.</li> </ul>  | Yes               |  |
| 2           | A reliability standard shall neither mandate nor prohibit any specific market structure.  Yes  |                   |  |
| 3           | <ol> <li>A reliability standard shall not preclude market solutions to achieving compliance<br/>with that standard.</li> </ol>   | Yes               |  |
| 4           | A reliability standard shall not require the public disclosure of commercially<br>sensitive information. All market participants shall have equal opportunity to<br>access commercially non-sensitive information that is required for compliance<br>with reliability standards. | Yes               |  |



| Related Standards  |  |  |
|--|--|--|
| Explanation  |  |  |
| Review to ensure no language and terminology inconsistency with requirements |  |  |
| developed under this project.  |  |  |
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|        | Related SARs |
|--------|--------------|
| SAR ID | Explanation  |
| N/A    | N/A          |

| Regional Variances |             |
|--------------------|-------------|
| Region             | Explanation |
| ERCOT              | N/A         |
| FRCC               | N/A         |
| MRO                | N/A         |
| NPCC               | N/A         |
| RFC                | N/A         |
| SERC               | N/A         |
| SPP                | N/A         |



|      | Regional Variances |
|------|--------------------|
| WECC | N/A                |