

Note: an Interpretation cannot be used to change a standard.

Request for an Interpretation of a Reliability Standard	
Date submitted: January 26, 2009	
Contact information for person requesting the interpretation:	
Name: Samuel Cabassa	
Organization: Covanta Energy	
Telephone: 973-882-7284	
E-mail: scabassa@covantaenergy.com	
Identify the standard that needs clarification:	
Standard Number: CIP-001-1	
Standard Title: Sabotage Reporting	
Identify specifically what needs clarification (If a category is not applicable, please leave it blank):	
Requirement Number and Text of Requirement: R2. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.	
Clarification needed: Please clarify what is meant by the term, "appropriate parties." Moreover, who within the Interconnection hierarchy deems parties to be appropriate?	
Identify the material impact associated with this interpretation:	
Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard. Failure to list and notify appropriate parties could potentially affect other entities within the Interconnection and expose our facilities to potential penalties.	

Project 2009-09: Response to Request for an Interpretation of CIP-001-1 Requirement R2 for Covanta Energy.

The following interpretation of CIP-001-1 — Sabotage Reporting Requirement R2 was developed by the Cyber Security Order 706 SAR drafting team.

Requirement Number and Text of Requirement

CIP-001-1:

R2. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.

Question

Please clarify what is meant by the term, "appropriate parties." Moreover, who within the Interconnection hierarchy deems parties to be appropriate?

Response

The drafting team interprets the phrase "appropriate parties in the Interconnection" to refer collectively to entities with whom the reporting party has responsibilities and/or obligations for the communication of physical or cyber security event information. For example, reporting responsibilities result from NERC standards IRO-001 Reliability Coordination — Responsibilities and Authorities, COM-002-2 Communication and Coordination, and TOP-001 Reliability Responsibilities and Authorities, among others. Obligations to report could also result from agreements, processes, or procedures with other parties, such as may be found in operating agreements and interconnection agreements.

The drafting team asserts that those entities to which communicating sabotage events is appropriate would be identified by the reporting entity and documented within the procedure required in CIP-001-1 Requirement R2.

Regarding "who within the Interconnection hierarchy deems parties to be appropriate," the drafting team knows of no interconnection authority that has such a role.