

### A. Introduction

1. **Title:** **Sabotage Reporting**
2. **Number:** CIP-001-2a
3. **Purpose:** Disturbances or unusual occurrences, suspected or determined to be caused by sabotage, shall be reported to the appropriate systems, governmental agencies, and regulatory bodies.
4. **Applicability**
  - 4.1. Reliability Coordinators.
  - 4.2. Balancing Authorities.
  - 4.3. Transmission Operators.
  - 4.4. Generator Operators.
  - 4.5. Load Serving Entities.
  - 4.6. Transmission Owners (only in ERCOT Region).
  - 4.7. Generator Owners (only in ERCOT Region).
5. **Effective Date:** ERCOT Regional Variance will be effective the first day of the first calendar quarter after applicable regulatory approval.

### B. Requirements

- R1. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi-site sabotage affecting larger portions of the Interconnection.
- 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.
- R3. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall provide its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events.
- R4. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials and develop reporting procedures as appropriate to their circumstances.

### C. Measures

- M1. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have and provide upon request a procedure (either electronic or hard copy) as defined in Requirement 1
- M2. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have and provide upon request the procedures or guidelines that will be used to confirm that it meets Requirements 2 and 3.

- M3.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have and provide upon request evidence that could include, but is not limited to procedures, policies, a letter of understanding, communication records, or other equivalent evidence that will be used to confirm that it has established communications contacts with the applicable, local FBI or RCMP officials to communicate sabotage events (Requirement 4).

## **D. Compliance**

### **1. Compliance Monitoring Process**

#### **1.1. Compliance Monitoring Responsibility**

Regional Reliability Organizations shall be responsible for compliance monitoring.

#### **1.2. Compliance Monitoring and Reset Time Frame**

One or more of the following methods will be used to verify compliance:

- Self-certification (Conducted annually with submission according to schedule.)
- Spot Check Audits (Conducted anytime with up to 30 days notice given to prepare.)
- Periodic Audit (Conducted once every three years according to schedule.)
- Triggered Investigations (Notification of an investigation must be made within 60 days of an event or complaint of noncompliance. The entity will have up to 30 days to prepare for the investigation. An entity may request an extension of the preparation period and the extension will be considered by the Compliance Monitor on a case-by-case basis.)

The Performance-Reset Period shall be 12 months from the last finding of non-compliance.

#### **1.3. Data Retention**

Each Reliability Coordinator, Transmission Operator, Generator Operator, Distribution Provider, and Load Serving Entity shall have current, in-force documents available as evidence of compliance as specified in each of the Measures.

If an entity is found non-compliant the entity shall keep information related to the non-compliance until found compliant or for two years plus the current year, whichever is longer.

Evidence used as part of a triggered investigation shall be retained by the entity being investigated for one year from the date that the investigation is closed, as determined by the Compliance Monitor,

The Compliance Monitor shall keep the last periodic audit report and all requested and submitted subsequent compliance records.

#### **1.4. Additional Compliance Information**

None.

### **2. Levels of Non-Compliance:**

**2.1. Level 1:** There shall be a separate Level 1 non-compliance, for every one of the following requirements that is in violation:

- 2.1.1** Does not have procedures for the recognition of and for making its operating personnel aware of sabotage events (R1).

- 2.1.2 Does not have procedures or guidelines for the communication of information concerning sabotage events to appropriate parties in the Interconnection (R2).
- 2.1.3 Has not established communications contacts, as specified in R4.
- 2.2. **Level 2:** Not applicable.
- 2.3. **Level 3:** Has not provided its operating personnel with sabotage response procedures or guidelines (R3).
- 2.4. **Level 4:** Not applicable.

## **E. ERCOT Interconnection-wide Regional Variance**

### **Requirements**

- EA.1.** Each Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Owner, Generator Operator, and Load Serving Entity shall have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi-site sabotage affecting larger portions of the Interconnection.
- EA.2.** Each Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Owner, Generator Operator, and Load Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.
- EA.3.** Each Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Owner, Generator Operator, and Load Serving Entity shall provide its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events.
- EA.4.** Each Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Owner, Generator Operator, and Load Serving Entity shall establish communications contacts with local Federal Bureau of Investigation (FBI) officials and develop reporting procedures as appropriate to their circumstances.

### **Measures**

- M.A.1.** Each Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Owner, Generator Operator, and Load Serving Entity shall have and provide upon request a procedure (either electronic or hard copy) as defined in Requirement EA1.
- M.A.2.** Each Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Owner, Generator Operator, and Load Serving Entity shall have and provide upon request the procedures or guidelines that will be used to confirm that it meets Requirements EA2 and EA3.
- M.A.3.** Each Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Owner, Generator Operator, and Load Serving Entity shall have and provide upon request evidence that could include, but is not limited to, procedures, policies, a letter of understanding, communication records,

or other equivalent evidence that will be used to confirm that it has established communications contacts with the local FBI officials to communicate sabotage events (Requirement EA4).

**Compliance**

**1. Compliance Monitoring Process**

**1.1. Compliance Enforcement Authority**

Regional Entity shall be responsible for compliance monitoring.

**1.2. Data Retention**

Each Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Owner, Generator Operator, and Load Serving Entity shall have current, in-force documents available as evidence of compliance as specified in each of the Measures.

If an entity is found non-compliant the entity shall keep information related to the non-compliance until found compliant or for two years plus the current year, whichever is longer.

Evidence used as part of a triggered investigation shall be retained by the entity being investigated for one year from the date that the investigation is closed, as determined by the Compliance Monitor,

The Compliance Monitor shall keep the last periodic audit report and all requested and submitted subsequent compliance records.

**Version History**

| <b>Version</b> | <b>Date</b>       | <b>Action</b>  | <b>Change Tracking</b> |
|----------------|-------------------|--|------------------------|
| 0              | April 1, 2005     | Effective Date   | New                    |
| 0              | August 8, 2005    | Removed “Proposed” from Effective Date   | Errata                 |
| 1              | November 1, 2006  | Adopted by Board of Trustees   | Amended                |
| 1              | April 4, 2007     | Regulatory Approval — Effective Date   | New                    |
| 1a             | February 16, 2010 | Added Appendix 1 — Interpretation of R2 approved by the NERC Board of Trustees | Addition               |
| 1a             | February 2, 2011  | Interpretation of R2 approved by FERC on February 2, 2011                      | Same addition          |
|                | June 10, 2010     | TRE regional ballot approved variance  | By Texas RE            |
|                | August 24, 2010   | Regional Variance Approved by Texas RE Board of Directors                      |                        |
| 2a             | February 16, 2011 | Approved by NERC Board of Trustees   |                        |

**Standard CIP-001-2a— Sabotage Reporting**

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|----|----------------|--|--|
| 2a | August 2, 2011 | FERC Order issued approving Texas RE Regional Variance |  |
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Appendix 1

| <b>Requirement Number and Text of Requirement</b>   |
|---|
| <p><b>CIP-001-1:</b></p> <p><b>R2.</b> 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.</p>   |
| <b>Question</b>   |
| <p>Please clarify what is meant by the term, “appropriate parties.” Moreover, who within the Interconnection hierarchy deems parties to be appropriate?</p>   |
| <b>Response</b>   |
| <p>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.</p> <p>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.</p> <p>Regarding “who within the Interconnection hierarchy deems parties to be appropriate,” the drafting team knows of no interconnection authority that has such a role.</p> |