



NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

PRIVILEGED AND CONFIDENTIAL INFORMATION  
HAS BEEN REMOVED FROM THIS PUBLIC VERSION

June 29, 2011

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

**Re: NERC Abbreviated Notice of Penalty regarding Unidentified Registered Entity  
FERC Docket No. NP11-\_\_-000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this Abbreviated Notice of Penalty (NOP) regarding Unidentified Registered Entity (URE), with information and details regarding the nature and resolution of the violations<sup>1</sup> discussed in detail in the Settlement Agreement (Attachment a) and the Disposition Documents (Attachment b), in accordance with the Federal Energy Regulatory Commission's (Commission or FERC) rules, regulations and orders, as well as NERC Rules of Procedure including Appendix 4C (NERC Compliance Monitoring and Enforcement Program (CMEP)).<sup>2</sup>

This NOP is being filed with the Commission because Western Electricity Coordinating Council (WECC) and URE have entered into a Settlement Agreement to resolve all outstanding issues arising from WECC's determination and findings of the violations of CIP-001-1 Requirement (R) 2, CIP-002-1 R1, CIP-003-1 R1, and CIP-004-1 R4. According to the Settlement Agreement, URE stipulates to the facts of the violations and has agreed to the assessed penalty of fourteen thousand dollars (\$14,000), in addition to other remedies and actions to mitigate the instant violations and facilitate future compliance under the terms and conditions of the Settlement Agreement. Accordingly, the violations identified as NERC Violation Tracking

<sup>1</sup> For purposes of this document, each violation at issue is described as a "violation," regardless of its procedural posture and whether it was a possible, alleged or confirmed violation.

<sup>2</sup> *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards* (Order No. 672), III FERC Stats. & Regs. ¶ 31,204 (2006); *Notice of New Docket Prefix "NP" for Notices of Penalty Filed by the North American Electric Reliability Corporation*, Docket No. RM05-30-000 (February 7, 2008). See also 18 C.F.R. Part 39 (2011). *Mandatory Reliability Standards for the Bulk-Power System*, FERC Stats. & Regs. ¶ 31,242 (2007) (Order No. 693), *reh'g denied*, 120 FERC ¶ 61,053 (2007) (Order No. 693-A). See 18 C.F.R. § 39.7(c)(2).

Identification Numbers WECC200901641, WECC200901671, WECC200901672, and WECC200901673 are being filed in accordance with the NERC Rules of Procedure and the CMEP.

**Statement of Findings Underlying the Violations**

This NOP incorporates the findings and justifications set forth in the Settlement Agreement executed on December 17, 2010, by and between WECC and URE. The details of the findings and the basis for the penalty are set forth in the Disposition Documents. This NOP filing contains the basis for approval of the Settlement Agreement by the NERC Board of Trustees Compliance Committee (NERC BOTCC). In accordance with Section 39.7 of the Commission’s regulations, 18 C.F.R. § 39.7, NERC provides the following summary table identifying each violation of a Reliability Standard resolved by the Settlement Agreement, as discussed in greater detail below.

NOC ID	NERC Violation ID	Reliability Std.	Req. (R)	VRF	Duration	Total Penalty (\$)
NOC-748	WECC200901641	CIP-001-1	2	Medium	6/18/07-10/15/09	14,000
	WECC200901671	CIP-002-1	1	Lower <sup>3</sup>	7/1/08-1/15/10	
	WECC200901672	CIP-003-1	1	Lower <sup>4</sup>	7/1/08-10/14/09	
	WECC200901673	CIP-004-1	4	Lower <sup>5</sup>	1/1/09-11/17/09	

The text of the Reliability Standards at issue and further information on the subject violations are set forth in the Disposition Documents.

CIP-001-1 R2 - OVERVIEW

WECC conducted an On-Site Compliance Audit of URE . WECC determined that URE did not identify interconnected Balancing Authorities and Transmission Operators as “appropriate” parties within its sabotage communications procedures.

<sup>3</sup> CIP-002-1 R1 and R1.2 each have a “Medium” Violation Risk Factor (VRF) and R1.1, R1.2.1, R1.2.2, R1.2.3, R1.2.4, R1.2.5, R1.2.6 and R1.2.7 each have a “Lower” VRF. When NERC filed VRFs it originally assigned CIP-002-1 R1 and R1.2 “Lower” VRFs. The Commission approved the VRF as filed; however, it directed NERC to submit modifications. NERC submitted the modified “Medium” VRFs and on January 27, 2009, the Commission approved the modified “Medium” VRFs. Therefore, the “Lower” VRFs for CIP-002-1 R1 and R1.2 were in effect from June 18, 2007 until January 27, 2009 when the “Medium” VRFs became effective.

<sup>4</sup> CIP-003-1 R1 has a “Medium” Violation Risk Factor (VRF); R1.1, R1.2 and R1.3 each have a “Lower” VRF. When NERC filed VRFs it originally assigned CIP-003-1 R1 a “Lower” VRF. The Commission approved the VRF as filed; however, it directed NERC to submit modifications. NERC submitted the modified “Medium” VRF and on January 27, 2009, the Commission approved the modified “Medium” VRF. Therefore, the “Lower” VRF for CIP-003-1 R1 was in effect from June 18, 2007 until January 27, 2009, when the “Medium” VRF became effective.

<sup>5</sup> CIP-004-1 R4 and R4.1 each have a “Lower” VRF; R4.2 has a “Medium” VRF. When NERC filed VRFs, it originally assigned CIP-004-1 R4.2 a Lower VRF. The Commission approved the VRF as filed; however, it directed NERC to submit modifications. NERC submitted the modified Medium VRF and on January 27, 2009, the Commission approved the modified Medium VRF. Therefore, the Lower VRF for CIP-004-1 R4.2 was in effect from June 18, 2007 until January 27, 2009 when the Medium VRF became effective.

CIP-002-1 R1 - OVERVIEW

WECC conducted a CIP Spot-Check on URE. WECC determined that URE did not properly consider blackstart generators or special protection systems in its risk-based assessment methodology.

CIP-003-1 R1 - OVERVIEW

WECC conducted a CIP Spot-Check on URE. WECC determined that URE did not fully address the requirements in Standards CIP-002 through CIP-009 in URE's Cyber Security Policy.

CIP-004-1 R4 - OVERVIEW

WECC conducted a CIP Spot-Check on URE. WECC determined that URE did not review its list of personnel with access to Critical Cyber Assets in the fourth quarter of 2008, as required by the Standard.

**Statement Describing the Assessed Penalty, Sanction or Enforcement Action Imposed<sup>6</sup>**

**Basis for Determination**

Taking into consideration the Commission's direction in Order No. 693, the NERC Sanction Guidelines, the Commission's July 3, 2008, October 26, 2009 and August 27, 2010 Guidance Orders,<sup>7</sup> the NERC BOTCC reviewed the Settlement Agreement and supporting documentation on May 9, 2011. The NERC BOTCC approved the Settlement Agreement, including WECC's assessment of a fourteen thousand dollar (\$14,000) financial penalty against URE and other actions to facilitate future compliance required under the terms and conditions of the Settlement Agreement. In approving the Settlement Agreement, the NERC BOTCC reviewed the applicable requirements of the Commission-approved Reliability Standards and the underlying facts and circumstances of the violations at issue.

In reaching this determination, the NERC BOTCC considered the following factors:

1. the violations constituted URE's first occurrence of violation of the subject NERC Reliability Standards;
2. WECC reported that URE was cooperative throughout the compliance enforcement process;
3. URE had a compliance program at the time of the violation which WECC considered a mitigating factor, as discussed in the Disposition Documents;
4. there was no evidence of any attempt to conceal a violation nor evidence of intent to do so;

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<sup>6</sup> See 18 C.F.R. § 39.7(d)(4).

<sup>7</sup> *North American Electric Reliability Corporation*, "Guidance Order on Reliability Notices of Penalty," 124 FERC ¶ 61,015 (2008); *North American Electric Reliability Corporation*, "Further Guidance Order on Reliability Notices of Penalty," 129 FERC ¶ 61,069 (2009); *North American Electric Reliability Corporation*, "Notice of No Further Review and Guidance Order," 132 FERC ¶ 61,182 (2010).

5. WECC determined that the violations of CIP-001-1 R2 and CIP-002-1 R1 posed a moderate risk and CIP-003-1 R1 and CIP-004-1 R4 posed a moderate risk and did not pose a serious or substantial risk to the reliability of the bulk power system (BPS), as discussed in the Disposition Documents; and
6. WECC reported that there were no other mitigating or aggravating factors or extenuating circumstances that would affect the assessed penalty.

For the foregoing reasons, the NERC BOTCC approved the Settlement Agreement and believes that the assessed penalty of fourteen thousand dollars (\$14,000) is appropriate for the violations and circumstances at issue, and is consistent with NERC's goal to promote and ensure reliability of the BPS.

Pursuant to 18 C.F.R. § 39.7(e), the penalty will be effective upon expiration of the 30 day period following the filing of this NOP with FERC, or, if FERC decides to review the penalty, upon final determination by FERC.

### **Request for Confidential Treatment**

Information in and certain attachments to the instant NOP include confidential information as defined by the Commission's regulations at 18 C.F.R. Part 388 and orders, as well as NERC Rules of Procedure including the NERC CMEP Appendix 4C to the Rules of Procedure. This includes non-public information related to certain Reliability Standard violations, certain Regional Entity investigative files, Registered Entity sensitive business information and confidential information regarding critical energy infrastructure.

In accordance with the Commission's Rules of Practice and Procedure, 18 C.F.R. § 388.112, a non-public version of the information redacted from the public filing is being provided under separate cover.

Because certain of the attached documents are deemed confidential by NERC, Registered Entities and Regional Entities, NERC requests that the confidential, non-public information be provided special treatment in accordance with the above regulation.

### **Attachments to be included as Part of this Notice of Penalty**

The attachments to be included as parts of this NOP are the following documents:

- a) Settlement Agreement by and between WECC and URE executed December 14, 2010, included as Attachment a;
- b) Disposition Document for Common Information, included as Attachment b;
  - i. Disposition Document for CIP-001-1 R2, included as Attachment b.1;
  - ii. Disposition Document for CIP-002-1 R1, included as Attachment b.2;
  - iii. Disposition Document for CIP-003-1 R1, included as Attachment b.3; and

- iv. Disposition Document for CIP-004-1 R4, included as Attachment b.4.
- c) Record Documents for CIP-001-1 R1:
  - i. WECC's Regional Determination of Alleged Violation Summary for CIP-001-1 R1, included as Attachment c.1;
  - ii. URE's Mitigation Plan MIT-07-2128 for CIP-001-1 R1, included as Attachment c.2;
  - iii. URE's Certification of Mitigation Plan Completion for CIP-001-1 R1, included as Attachment c.3; and
  - iv. WECC's Verification of Mitigation Plan Completion for CIP-001-1 R1, included as Attachment c.4.
- d) Record Documents for CIP-002-1 R1:
  - i. WECC's Regional Determination of Alleged Violation Summary for CIP-002-1 R1, included as Attachment d.1;
  - ii. URE's Revised Mitigation Plan MIT-08-2483 for CIP-002-1 R1, included as Attachment d.2;
  - iii. URE's Certification of Mitigation Plan Completion for CIP-002-1 R1, included as Attachment d.3; and
  - iv. WECC's Verification of Mitigation Plan Completion for CIP-002-1 R1, included as Attachment d.4.
- e) Record Documents for CIP-003-1 R1:
  - i. WECC's Regional Determination of Alleged Violation Summary for CIP-003-1 R1, included as Attachment e.1;
  - ii. URE's Mitigation Plan MIT-08-2606 for CIP-003-1 R1, included as Attachment e.2;
  - iii. URE's Certification of Mitigation Plan Completion for CIP-003-1 R1, included as Attachment e.3; and
  - iv. WECC's Verification of Mitigation Plan Completion for CIP-003-1 R1, included as Attachment e.4.
- f) Record Documents for CIP-004-1 R4:
  - i. WECC's Regional Determination of Alleged Violation Summary for CIP-004-1 R4, included as Attachment f.1;
  - ii. URE's Mitigation Plan MIT-08-2230 for CIP-004-1 R4, included as Attachment f.2;
  - iii. URE's Certification of Mitigation Plan Completion for CIP-004-1 R4, included as Attachment f.3; and
  - iv. WECC's Verification of Mitigation Plan Completion for CIP-004-1 R4, included as Attachment f.4.

### **A Form of Notice Suitable for Publication<sup>8</sup>**

A copy of a notice suitable for publication is included in Attachment g.

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<sup>8</sup> See 18 C.F.R. § 39.7(d)(6).

**Notices and Communications**

Notices and communications with respect to this filing may be addressed to the following:

<p>Gerald W. Cauley President and Chief Executive Officer David N. Cook* Sr. Vice President and General Counsel North American Electric Reliability Corporation 116-390 Village Boulevard Princeton, NJ 08540-5721 (609) 452-8060 (609) 452-9550 – facsimile david.cook@nerc.net</p> <p>Mark Maher* Chief Executive Officer Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (360) 713-9598 (801) 582-3918 – facsimile Mark@wecc.biz</p> <p>Constance White* Vice President of Compliance Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 883-6855 (801) 883-6894 – facsimile CWhite@wecc.biz</p> <p>Sandy Mooy* Associate General Counsel Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 819-7658 (801) 883-6894 – facsimile SMooy@wecc.biz</p>	<p>Rebecca J. Michael* Associate General Counsel for Regulatory and Corporate Matters Davis Smith* Attorney North American Electric Reliability Corporation 1120 G Street, N.W. Suite 990 Washington, DC 20005-3801 (202) 393-3998 (202) 393-3955 – facsimile rebecca.michael@nerc.net davis.smith@nerc.net</p> <p>Christopher Luras* Manager of Compliance Enforcement Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 883-6887 (801) 883-6894 – facsimile CLuras@wecc.biz</p> <p>*Persons to be included on the Commission’s service list are indicated with an asterisk. NERC requests waiver of the Commission’s rules and regulations to permit the inclusion of more than two people on the service list.</p>
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NERC Notice of Penalty  
Unidentified Registered Entity  
June 29, 2011  
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PRIVILEGED AND CONFIDENTIAL INFORMATION  
HAS BEEN REMOVED FROM THIS PUBLIC VESION

## Conclusion

Accordingly, NERC respectfully requests that the Commission accept this Abbreviated NOP as compliant with its rules, regulations and orders.

Respectfully submitted,

Gerald W. Cauley  
President and Chief Executive Officer  
David N. Cook  
Sr. Vice President and General Counsel  
North American Electric Reliability Corporation  
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(609) 452-9550 – facsimile  
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/s/ Rebecca J. Michael  
Rebecca J. Michael  
Associate General Counsel for Regulatory  
and Corporate Matters  
Davis Smith  
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rebecca.michael@nerc.net  
davis.smith@nerc.net

cc: Unidentified Registered Entity  
Western Electricity Coordinating Council

Attachments



## **Attachment b**

# **Disposition Document for Common Information**



**DISPOSITION OF VIOLATION<sup>1</sup>**  
**INFORMATION COMMON TO INSTANT VIOLATIONS**  
**Dated May 9, 2011**

REGISTERED ENTITY                      NERC REGISTRY ID                      NOC#  
**Unidentified Registered Entity**      **NCRXXXXX**                      **NOC-748**  
**(URE)**  
REGIONAL ENTITY  
**Western Electricity Coordinating Council (WECC)**

IS THERE A SETTLEMENT AGREEMENT      YES       NO

WITH RESPECT TO THE VIOLATION(S), REGISTERED ENTITY

NEITHER ADMITS NOR DENIES IT (SETTLEMENT ONLY)      YES   
ADMITS TO IT                      YES   
DOES NOT CONTEST IT (INCLUDING WITHIN 30 DAYS)      YES

WITH RESPECT TO THE ASSESSED PENALTY OR SANCTION, REGISTERED ENTITY

ACCEPTS IT/ DOES NOT CONTEST IT                      YES

**I.      PENALTY INFORMATION**

TOTAL ASSESSED PENALTY OR SANCTION OF **\$14,000** FOR **FOUR** VIOLATIONS OF RELIABILITY STANDARDS.

(1) REGISTERED ENTITY'S COMPLIANCE HISTORY

PREVIOUSLY FILED VIOLATIONS OF ANY OF THE INSTANT RELIABILITY STANDARD(S) OR REQUIREMENT(S) THEREUNDER  
YES       NO

LIST VIOLATIONS AND STATUS

ADDITIONAL COMMENTS

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<sup>1</sup> For purposes of this document and attachments hereto, each violation at issue is described as a "violation," regardless of its procedural posture and whether it was a possible, alleged or confirmed violation.

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Attachment b

PREVIOUSLY FILED VIOLATIONS OF OTHER RELIABILITY  
STANDARD(S) OR REQUIREMENTS THEREUNDER

YES  NO

LIST VIOLATIONS AND STATUS

ADDITIONAL COMMENTS

(2) THE DEGREE AND QUALITY OF COOPERATION BY THE REGISTERED  
ENTITY (IF THE RESPONSE TO FULL COOPERATION IS "NO," THE  
ABBREVIATED NOP FORM MAY NOT BE USED.)

FULL COOPERATION YES  NO   
IF NO, EXPLAIN

(3) THE PRESENCE AND QUALITY OF THE REGISTERED ENTITY'S  
COMPLIANCE PROGRAM

IS THERE A DOCUMENTED COMPLIANCE PROGRAM  
YES  NO  UNDETERMINED   
EXPLAIN

**The WECC Audit Team reviewed URE's Internal Compliance  
Program (ICP), and WECC considered it a mitigating factor in  
determining the penalty amount.**

EXPLAIN SENIOR MANAGEMENT'S ROLE AND INVOLVEMENT  
WITH RESPECT TO THE REGISTERED ENTITY'S COMPLIANCE  
PROGRAM, INCLUDING WHETHER SENIOR MANAGEMENT  
TAKES ACTIONS THAT SUPPORT THE COMPLIANCE PROGRAM,  
SUCH AS TRAINING, COMPLIANCE AS A FACTOR IN EMPLOYEE  
EVALUATIONS, OR OTHERWISE.

**See above.**

(4) ANY ATTEMPT BY THE REGISTERED ENTITY TO CONCEAL THE  
VIOLATION(S) OR INFORMATION NEEDED TO REVIEW, EVALUATE OR  
INVESTIGATE THE VIOLATION.

YES  NO   
IF YES, EXPLAIN

**PRIVILEGED AND CONFIDENTIAL INFORMATION  
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Attachment b

(5) ANY EVIDENCE THE VIOLATION(S) WERE INTENTIONAL (IF THE RESPONSE IS "YES," THE ABBREVIATED NOP FORM MAY NOT BE USED.)

YES  NO   
IF YES, EXPLAIN

(6) ANY OTHER MITIGATING FACTORS FOR CONSIDERATION

YES  NO   
IF YES, EXPLAIN

(7) ANY OTHER AGGRAVATING FACTORS FOR CONSIDERATION

YES  NO   
IF YES, EXPLAIN

(8) ANY OTHER EXTENUATING CIRCUMSTANCES

YES  NO   
IF YES, EXPLAIN

OTHER RELEVANT INFORMATION:

NOTICE OF ALLEGED VIOLATION AND PROPOSED PENALTY OR  
SANCTION ISSUED

DATE: 12/14/09 OR N/A

SETTLEMENT REQUEST DATE

DATE: 1/22/10 OR N/A

NOTICE OF CONFIRMED VIOLATION ISSUED

DATE: OR N/A

SUPPLEMENTAL RECORD INFORMATION

DATE(S) OR N/A

REGISTERED ENTITY RESPONSE CONTESTED

FINDINGS  PENALTY  BOTH  DID NOT CONTEST

**PRIVILEGED AND CONFIDENTIAL INFORMATION  
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Attachment b

HEARING REQUESTED

YES  NO

DATE

OUTCOME

APPEAL REQUESTED

## **Disposition Document for CIP-001-1 R2**

**DISPOSITION OF VIOLATION**

**Dated May 9, 2011**

NERC TRACKING NO. WECC200901641 REGIONAL ENTITY TRACKING NO. URE\_WECC20091814

**I. VIOLATION INFORMATION**

RELIABILITY STANDARD	REQUIREMENT(S)	SUB-REQUIREMENT(S)	VRF(S)	VSL(S)
CIP-001-1	2		Medium	High

PURPOSE OF THE RELIABILITY STANDARD AND TEXT OF RELIABILITY STANDARD AND REQUIREMENT(S)/SUB-REQUIREMENT(S)

The purpose statement of CIP-001-1 provides: “Disturbances or unusual occurrences, suspected or determined to be caused by sabotage, shall be reported to the appropriate systems, governmental agencies, and regulatory bodies.”

CIP-001-1 R2 provides: “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.”

VIOLATION DESCRIPTION

WECC conducted an On-Site Compliance Audit (Audit) of URE. The WECC Audit Team reviewed URE’s physical security procedure, reporting procedure and emergency incident and disturbance reports procedure, identified by URE as proof of compliance with CIP-001-1 R2. During the Audit, the WECC Audit Team gathered more information during a tour of an URE Control Room. The WECC Audit Team posed the question to an URE Control Room Operator concerning who would be contacted in the event of a sabotage event. The operator’s response to the WECC Audit Team did not demonstrate awareness among URE Operators of a procedure to contact appropriate parties in the Interconnection with information concerning sabotage events. Further, URE’s referenced procedures did not identify the appropriate parties to receive information concerning sabotage events. Specifically, URE did not include specific procedures to notify interconnected Balancing Authorities and Transmission Operators of a sabotage event. Also, URE did not demonstrate an awareness of the correct procedure within URE’s Control Center Operations, in violation of CIP-001-1 R2.

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Attachment b.1

RELIABILITY IMPACT STATEMENT- POTENTIAL AND ACTUAL

The violation posed a moderate risk to the reliability of the bulk power system (BPS) because failure to identify which parties should receive sabotage information increases the likelihood that such information may not be communicated to affected entities. This violation did not pose a serious or substantial risk to the BPS because URE did have procedures to communicate sabotage information to the appropriate parties, even though URE did not specify the parties by name. In addition, URE had procedures in place for the recognition of sabotage events and for making its operating personnel aware of sabotage events on its facilities and multi-site sabotage events affecting larger portions of the Interconnection. URE provided its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events, and developed reporting procedures for contacting the FBI if necessary.

**II. DISCOVERY INFORMATION**

METHOD OF DISCOVERY

- SELF-REPORT
- SELF-CERTIFICATION
- COMPLIANCE AUDIT
- COMPLIANCE VIOLATION INVESTIGATION
- SPOT CHECK
- COMPLAINT
- PERIODIC DATA SUBMITTAL
- EXCEPTION REPORTING

DURATION DATE(S) **6/18/07 (when the Standard became mandatory and enforceable) through 10/15/09 (Mitigation Plan completion)**

DATE DISCOVERED BY OR REPORTED TO REGIONAL ENTITY **Audit**

IS THE VIOLATION STILL OCCURRING      YES       NO   
IF YES, EXPLAIN

REMEDIAL ACTION DIRECTIVE ISSUED      YES       NO   
PRE TO POST JUNE 18, 2007 VIOLATION      YES       NO

**PRIVILEGED AND CONFIDENTIAL INFORMATION  
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Attachment b.1

**III. MITIGATION INFORMATION**

FOR FINAL ACCEPTED MITIGATION PLAN:

MITIGATION PLAN NO.	<b>MIT-07-2128</b>
DATE SUBMITTED TO REGIONAL ENTITY	<b>10/26/09</b>
DATE ACCEPTED BY REGIONAL ENTITY	<b>11/4/09</b>
DATE APPROVED BY NERC	<b>11/12/09</b>
DATE PROVIDED TO FERC	<b>11/12/09</b>

IDENTIFY AND EXPLAIN ALL PRIOR VERSIONS THAT WERE ACCEPTED OR REJECTED, IF APPLICABLE

MITIGATION PLAN COMPLETED      YES       NO

EXPECTED COMPLETION DATE **Submitted as complete**  
EXTENSIONS GRANTED  
ACTUAL COMPLETION DATE      **10/15/09**

DATE OF CERTIFICATION LETTER      **11/4/09<sup>1</sup>**  
CERTIFIED COMPLETE BY REGISTERED ENTITY AS OF      **10/15/09**

DATE OF VERIFICATION LETTER      **11/11/09**  
VERIFIED COMPLETE BY REGIONAL ENTITY AS OF      **10/15/09**

ACTIONS TAKEN TO MITIGATE THE ISSUE AND PREVENT RECURRENCE

**URE has added language to its sabotage reporting procedure, requiring information be sent to all URE-interconnected BAs and TOPs. URE has also informed all Operators and support staff of the changes made to the procedure.**

LIST OF EVIDENCE REVIEWED BY REGIONAL ENTITY TO EVALUATE COMPLETION OF MITIGATION PLAN OR MILESTONES (FOR CASES IN WHICH MITIGATION IS NOT YET COMPLETED, LIST EVIDENCE REVIEWED FOR COMPLETED MILESTONES)

- **Sabotage Reporting procedure**

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<sup>1</sup> URE's Certification of Mitigation Plan Completion is dated October 26, 2009 but was not submitted until November 4, 2009.



EXHIBITS:

SOURCE DOCUMENT

**WECC's Regional Determination of Alleged Violation Summary for CIP-001-1 R1**

MITIGATION PLAN

**URE's Mitigation Plan MIT-07-2128 for CIP-001-1 R1**

CERTIFICATION BY REGISTERED ENTITY

**URE's Certification of Mitigation Plan Completion for CIP-001-1 R1**

VERIFICATION BY REGIONAL ENTITY

**WECC's Notice of Mitigation Plan and Completed Mitigation Plan Acceptance**

## **Disposition Document for CIP-002-1 R1**

**DISPOSITION OF VIOLATION**

**Dated May 9, 2011**

NERC TRACKING NO. WECC200901671 REGIONAL ENTITY TRACKING NO. URE\_WECC20091844

**I. VIOLATION INFORMATION**

RELIABILITY STANDARD	REQUIREMENT(S)	SUB-REQUIREMENT(S)	VRF(S)	VSL(S)
CIP-002-1 <sup>1</sup>	1	1.2.4, 1.2.6	Lower	N/A <sup>2</sup>

PURPOSE OF THE RELIABILITY STANDARD AND TEXT OF RELIABILITY STANDARD AND REQUIREMENT(S)/SUB-REQUIREMENT(S)

**The purpose statement of CIP-002-1 provides in pertinent part: “Standard CIP-002 requires the identification and documentation of the Critical Cyber Assets associated with the Critical Assets that support the reliable operation of the Bulk Electric System. These Critical Assets are to be identified through the application of a risk-based assessment.”**

CIP-002-1 R1 provides:

**R1. Critical Asset Identification Method — The Responsible Entity<sup>13</sup> shall identify and document a risk-based assessment methodology to use to identify its Critical Assets.**

**R1.1. The Responsible Entity shall maintain documentation describing its risk-based assessment methodology that includes procedures and evaluation criteria.**

**R1.2. The risk-based assessment shall consider the following assets:**

<sup>1</sup> The Settlement Agreement contains a typographical error on page one listing the violation as being of Standard CIP-002-0 instead of CIP-002-1.

<sup>2</sup> At the time of the violations, no VSLs were in effect for CIP-002-1. On June 30, 2009, NERC submitted VSLs for the CIP-002-1 through CIP-009-1 Reliability Standards. On March 18, 2010, the Commission approved the VSLs as filed, but directed NERC to submit modifications.

<sup>3</sup> Within the text of Standard CIP-002, “Responsible Entity” shall mean Reliability Coordinator, Balancing Authority, Interchange Authority, Transmission Service Provider, Transmission Owner, Transmission Operator, Generator Owner, Generator Operator, Load Serving Entity, NERC, and Regional Reliability Organizations.

**PRIVILEGED AND CONFIDENTIAL INFORMATION  
HAS BEEN REMOVED FROM THIS PUBLIC VERSION**

Attachment b.2

**R1.2.1. Control centers and backup control centers performing the functions of the entities listed in the Applicability section of this standard.**

**R1.2.2. Transmission substations that support the reliable operation of the Bulk Electric System.**

**R1.2.3. Generation resources that support the reliable operation of the Bulk Electric System.**

**R1.2.4. Systems and facilities critical to system restoration, including blackstart generators and substations in the electrical path of transmission lines used for initial system restoration.**

**R1.2.5. Systems and facilities critical to automatic load shedding under a common control system capable of shedding 300 MW or more.**

**R1.2.6. Special Protection Systems that support the reliable operation of the Bulk Electric System.**

**R1.2.7. Any additional assets that support the reliable operation of the Bulk Electric System that the Responsible Entity deems appropriate to include in its assessment.**

(Footnote added).

**VIOLATION DESCRIPTION**

**WECC conducted a CIP Spot-Check on URE. URE provided its 2008 and 2009 Risk Based Assessment Methodology (RBAM) as supporting evidence and documentation of its compliance with this Standard. URE did not include an RBAM for blackstart generators or Special Protection Systems (SPSs), but instead included declaratory statements assessing their degree of criticality.**

**URE believed that the Reliability Standard only required it to consider whether such assets were Critical Assets in developing its RBAM, rather than requiring that it separately identify the methodology used to reach that conclusion in its RBAM. URE did document in its RBAM a conclusion that blackstart units were not critical to maintaining the reliability of the bulk power system (BPS) within the Balancing Authority Area. URE reached this conclusion because of the availability of other diverse sources and redundant paths.**

**PRIVILEGED AND CONFIDENTIAL INFORMATION  
HAS BEEN REMOVED FROM THIS PUBLIC VERSION**

Attachment b.2

**URE did consider whether SPSs were critical, but did not offer any additional evidence of a risk-based assessment methodology that included evaluation criteria for SPSs. It also did not provide sufficient demonstration of an appropriate application of its assessment of the SPSs under its RBAM. URE attested to its engineering analysis of the criticality of these SPSs on the BPS by analyzing the consequence of misoperation or failure of these schemes. WECC could not duplicate the analysis for the exclusion of equipment in the absence of any specific rationale or methodology, and therefore sustained a violation.**

**RELIABILITY IMPACT STATEMENT- POTENTIAL AND ACTUAL**

**The violation did not pose a serious or substantial risk to the reliability of the BPS because URE did consider these Asset types and did include accurate declaratory statements as to their degree of criticality. The violation posed a moderate<sup>4</sup> potential risk to the reliability of the BPS because the absence of evaluation criteria for blackstart generation units and SPS in its RBAM could cause such assets to be overlooked for the protection afforded to Critical Cyber Assets.**

**II. DISCOVERY INFORMATION**

**METHOD OF DISCOVERY**

- SELF-REPORT
- SELF-CERTIFICATION
- COMPLIANCE AUDIT
- COMPLIANCE VIOLATION INVESTIGATION
- SPOT CHECK
- COMPLAINT
- PERIODIC DATA SUBMITTAL
- EXCEPTION REPORTING

**DURATION DATE(S) 7/1/08 (when URE was required to be compliant with the Standard as a "Table 1 entity") through 1/15/10 (Mitigation Plan completion)**

**DATE DISCOVERED BY OR REPORTED TO REGIONAL ENTITY Spot Check**

**IS THE VIOLATION STILL OCCURRING YES  NO**   
**IF YES, EXPLAIN**

**REMEDIAL ACTION DIRECTIVE ISSUED YES  NO**   
**PRE TO POST JUNE 18, 2007 VIOLATION YES  NO**

<sup>4</sup> The Regional Determination documents states that the violation posed a severe risk to the BPS; however, after WECC conducted a more thorough investigation and received additional documents from URE, WECC determined that the violation posed a moderate risk to the BPS.

**PRIVILEGED AND CONFIDENTIAL INFORMATION  
HAS BEEN REMOVED FROM THIS PUBLIC VERSION**

Attachment b.2

**III. MITIGATION INFORMATION**

FOR FINAL ACCEPTED MITIGATION PLAN:

MITIGATION PLAN NO.	<b>MIT-08-2483</b>
DATE SUBMITTED TO REGIONAL ENTITY	<b>1/19/10<sup>5</sup></b>
DATE ACCEPTED BY REGIONAL ENTITY	<b>1/19/10</b>
DATE APPROVED BY NERC	<b>5/6/10</b>
DATE PROVIDED TO FERC	<b>5/6/10</b>

IDENTIFY AND EXPLAIN ALL PRIOR VERSIONS THAT WERE ACCEPTED OR REJECTED, IF APPLICABLE

**URE submitted a Mitigation Plan for this violation on October 26, 2009 and on November 4, 2009 URE certified that the Mitigation Plan was completed. However, URE updated its RBAM and therefore provided a revised Mitigation Plan.**

MITIGATION PLAN COMPLETED      YES       NO

EXPECTED COMPLETION DATE **Submitted as complete**  
EXTENSIONS GRANTED  
ACTUAL COMPLETION DATE    **1/15/10**

DATE OF CERTIFICATION LETTER	<b>1/15/10<sup>6</sup></b>
CERTIFIED COMPLETE BY REGISTERED ENTITY AS OF	<b>1/15/10</b>

DATE OF VERIFICATION LETTER	<b>4/20/10</b>
VERIFIED COMPLETE BY REGIONAL ENTITY AS OF	<b>1/15/10</b>

ACTIONS TAKEN TO MITIGATE THE ISSUE AND PREVENT RECURRENCE

**URE has modified its RBAM to include specific language describing evaluation criteria for the two subject asset types.**

LIST OF EVIDENCE REVIEWED BY REGIONAL ENTITY TO EVALUATE COMPLETION OF MITIGATION PLAN OR MILESTONES (FOR CASES IN WHICH MITIGATION IS NOT YET COMPLETED, LIST EVIDENCE REVIEWED FOR COMPLETED MILESTONES)

- **URE's Risk-Based Assessment Methodology**

<sup>5</sup> URE's Mitigation Plan is dated January 15, 2010 but was not submitted until January 19, 2010.

<sup>6</sup> URE's Certification of Mitigation Plan Completion is dated January 15, 2010 but was not submitted until January 19, 2010.

EXHIBITS:

SOURCE DOCUMENT

**WECC's Regional Determination of Alleged Violation Summary for CIP-002-1 R1**

MITIGATION PLAN

**URE's Revised Mitigation Plan MIT-08-2483 for CIP-002-1 R1**

CERTIFICATION BY REGISTERED ENTITY

**URE's Certification of Mitigation Plan Completion for CIP-002-1 R1**

VERIFICATION BY REGIONAL ENTITY

**WECC's Notice of Mitigation Plan and Completed Mitigation Plan Acceptance**

## **Disposition Document for CIP-003-1 R1**



**DISPOSITION OF VIOLATION**

**Dated May 9, 2011**

NERC TRACKING NO. **WECC200901672** REGIONAL ENTITY TRACKING NO. **URE\_WECC20091845**

**I. VIOLATION INFORMATION**

RELIABILITY STANDARD	REQUIREMENT(S)	SUB-REQUIREMENT(S)	VRF(S)	VSL(S)
<b>CIP-003-1</b>	<b>1</b>	<b>1.1</b>	<b>Lower<sup>1</sup></b>	<b>N/A<sup>2</sup></b>

PURPOSE OF THE RELIABILITY STANDARD AND TEXT OF RELIABILITY STANDARD AND REQUIREMENT(S)/SUB-REQUIREMENT(S)

**The purpose statement of CIP-003-1 provides in pertinent part: “Standard CIP-003 requires that Responsible Entities have minimum security management controls in place to protect Critical Cyber Assets. Standard CIP-003 should be read as part of a group of standards numbered Standards CIP-002 through CIP-009....”**

**CIP-003-1 R1 provides:**

**R1. C yber S ecurity Policy — The R esponsible E ntity<sup>3</sup> shall document a nd i mplement a c yber security policy t hat rep resents management’s c ommitment a nd a bility to secure i ts C ritical C yber Assets. The R esponsible E ntity s hall, a t m inimum, e nsure t he following:**

**R1.1. The c yber s ecurity policy a ddresses the requirements in Standards C IP-002 t hrough C IP-009, i ncluding p rovision for emergency situations.**

<sup>1</sup> CIP-003-1 R1 has a “Medium” Violation Risk Factor (VRF); R1.1, R1.2 and R1.3 each have a “Lower” VRF. When NERC filed VRFs it originally assigned CIP-003-1 R1 a “Lower” VRF. The Commission approved the VRF as filed; however, it directed NERC to submit modifications. NERC submitted the modified “Medium” VRF and on January 27, 2009, the Commission approved the modified “Medium” VRF. Therefore, the “Lower” VRF for CIP-003-1 R1 was in effect from June 18, 2007 until January 27, 2009, when the “Medium” VRF became effective.

<sup>2</sup> At the time of the violations, no VSLs were in effect for CIP-003-1. On June 30, 2009, NERC submitted VSLs for the CIP-002-1 through CIP-009-1 Reliability Standards. On March 18, 2010, the Commission approved the VSLs as filed, but directed NERC to submit modifications.

<sup>3</sup> Within the text of Standard CIP-003, “Responsible Entity” shall mean Reliability Coordinator, Balancing Authority, Interchange Authority, Transmission Service Provider, Transmission Owner, Transmission Operator, Generator Owner, Generator Operator, Load Serving Entity, NERC, and Regional Reliability Organizations.

**PRIVILEGED AND CONFIDENTIAL INFORMATION  
HAS BEEN REMOVED FROM THIS PUBLIC VERSION**

Attachment b.3

**R1.2. The cyber security policy is readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets.**

**R1.3. Annual review and approval of the cyber security policy by the senior manager assigned pursuant to R2.**

(Footnote added).

**VIOLATION DESCRIPTION**

**WECC conducted a CIP Spot-Check on URE. WECC reviewed the URE Cyber Security Policies in use during the audit period (Version 2.0, 2.01, 3.0), as well as documentation provided by URE relating to compliance with CIP Standards CIP-002-1 through CIP-009-1. The documents generally refer to CIP-002 through CIP-009, but no single version or versions of the policy documentation provided by URE individually addressed all of the requirements of CIP-002 through CIP-009, thereby violating CIP-003-1.**

**RELIABILITY IMPACT STATEMENT- POTENTIAL AND ACTUAL**

**The violation posed a minimal risk to the reliability of the bulk power system (BPS) because although URE’s cyber security policies did not specifically address each CIP-002 through CIP-009 requirement in its policy document, it did generally address the cyber security components covered in CIP-002 through CIP-009, there was no evidence that URE failed to comply with any of these requirements, and there was no evidence that URE’s commitment to compliance with such requirements was otherwise hindered. In addition, the URE Cyber Security Policy included within its policy statement that it is “committed to the continuous compliance with all Requirements of the NERC CIP Standards (CIP-002 through CIP-009).**

**II. DISCOVERY INFORMATION**

**METHOD OF DISCOVERY**

- SELF-REPORT
- SELF-CERTIFICATION
- COMPLIANCE AUDIT
- COMPLIANCE VIOLATION INVESTIGATION
- SPOT CHECK
- COMPLAINT
- PERIODIC DATA SUBMITTAL
- EXCEPTION REPORTING

**PRIVILEGED AND CONFIDENTIAL INFORMATION  
HAS BEEN REMOVED FROM THIS PUBLIC VERSION**

Attachment b.3

**DURATION DATE(S) 7/1/08 (when URE was required to be compliant with the Standard as a “Table 1 entity”) through 10/14/09 (Mitigation Plan completion)**

**DATE DISCOVERED BY OR REPORTED TO REGIONAL ENTITY Spot Check**

IS THE VIOLATION STILL OCCURRING      YES       NO   
IF YES, EXPLAIN

REMEDIAL ACTION DIRECTIVE ISSUED      YES       NO   
PRE TO POST JUNE 18, 2007 VIOLATION      YES       NO

**III. MITIGATION INFORMATION**

FOR FINAL ACCEPTED MITIGATION PLAN:

MITIGATION PLAN NO.      **MIT-08-2606**  
DATE SUBMITTED TO REGIONAL ENTITY      **10/26/09**  
DATE ACCEPTED BY REGIONAL ENTITY      **6/16/10**  
DATE APPROVED BY NERC      **7/6/10**  
DATE PROVIDED TO FERC      **7/6/10**

IDENTIFY AND EXPLAIN ALL PRIOR VERSIONS THAT WERE ACCEPTED OR REJECTED, IF APPLICABLE

MITIGATION PLAN COMPLETED      YES       NO

EXPECTED COMPLETION DATE **Submitted as complete**  
EXTENSIONS GRANTED  
ACTUAL COMPLETION DATE      **10/14/09**

DATE OF CERTIFICATION LETTER      **10/26/09<sup>4</sup>**  
CERTIFIED COMPLETE BY REGISTERED ENTITY AS OF      **10/14/09**

DATE OF VERIFICATION LETTER      **6/23/10**  
VERIFIED COMPLETE BY REGIONAL ENTITY AS OF      **10/14/09**

ACTIONS TAKEN TO MITIGATE THE ISSUE AND PREVENT RECURRENCE

**URE revised its Cyber Security Policy and issued revision 4. The new revision alters the Policy Statement section and specifically lists each of the**

<sup>4</sup> URE’s Certification of Mitigation Plan Completion is dated October 26, 2009 but was not submitted until November 4, 2009.

**forty-one Requirements of the subject Standards. URE posted the revised policy document and distributed it to all individuals having unescorted physical or electronic cyber access to Critical Cyber Assets of the company.**

LIST OF EVIDENCE REVIEWED BY REGIONAL ENTITY TO EVALUATE COMPLETION OF MITIGATION PLAN OR MILESTONES (FOR CASES IN WHICH MITIGATION IS NOT YET COMPLETED, LIST EVIDENCE REVIEWED FOR COMPLETED MILESTONES)

- **Cyber Security Policy Version 4**

EXHIBITS:

SOURCE DOCUMENT

**WECC's Regional Determination of Alleged Violation Summary for CIP-003-1 R1**

MITIGATION PLAN

**URE's Mitigation Plan MIT-08-2606 for CIP-003-1 R1**

CERTIFICATION BY REGISTERED ENTITY

**URE's Certification of Mitigation Plan Completion for CIP-003-1 R1**

VERIFICATION BY REGIONAL ENTITY

**WECC's Notice of Mitigation Plan and Completed Mitigation Plan Acceptance**

## **Disposition Document for CIP-004-1 R4**

**DISPOSITION OF VIOLATION**

**Dated May 9, 2011**

NERC TRACKING NO. **WECC20090167** REGIONAL ENTITY TRACKING NO. **URE\_WECC20091846**

**I. VIOLATION INFORMATION**

RELIABILITY STANDARD	REQUIREMENT(S)	SUB-REQUIREMENT(S)	VRF(S)	VSL(S)
<b>CIP-004-1<sup>1</sup></b>	<b>4</b>	<b>4.1</b>	<b>Lower<sup>2</sup></b>	<b>N/A<sup>3</sup></b>

PURPOSE OF THE RELIABILITY STANDARD AND TEXT OF RELIABILITY STANDARD AND REQUIREMENT(S)/SUB-REQUIREMENT(S)

**The purpose statement of CIP-004-1 provides in pertinent part: “Standard CIP-004 requires that personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including contractors and service vendors, have an appropriate level of personnel risk assessment, training, and security awareness. Standard CIP-004 should be read as part of a group of standards numbered Standards CIP-002 through CIP-009....”**

**CIP-004-1 R4 provides:**

**R4. Access — The Responsible Entity<sup>4</sup> shall maintain list(s) of personnel with a authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets.**

<sup>1</sup> The Settlement Agreement contains a typographical error on page one listing the violation as being of Standard CIP-004-0 instead of CIP-004-1.

<sup>2</sup> CIP-004-1 R4 and R4.1 each have a “Lower” VRF; R4.2 has a “Medium” VRF. When NERC filed VRFs, it originally assigned CIP-004-1 R4.2 a Lower VRF. The Commission approved the VRF as filed; however, it directed NERC to submit modifications. NERC submitted the modified Medium VRF and on January 27, 2009, the Commission approved the modified Medium VRF. Therefore, the Lower VRF for CIP-004-1 R4.2 was in effect from June 18, 2007 until January 27, 2009 when the Medium VRF became effective.

<sup>3</sup> At the time of the violations, no VSLs were in effect for CIP-004-1. On June 30, 2009, NERC submitted VSLs for the CIP-002-1 through CIP-009-1 Reliability Standards. On March 18, 2010, the Commission approved the VSLs as filed, but directed NERC to submit modifications.

<sup>4</sup> Within the text of Standard CIP-004, “Responsible Entity” shall mean Reliability Coordinator, Balancing Authority, Interchange Authority, Transmission Service Provider, Transmission Owner, Transmission Operator, Generator Owner, Generator Operator, Load Serving Entity, NERC, and Regional Reliability Organizations.

**PRIVILEGED AND CONFIDENTIAL INFORMATION  
HAS BEEN REMOVED FROM THIS PUBLIC VERSION**

Attachment b.4

**R4.1. The Responsible Entity shall review the list(s) of its personnel who have such access to Critical Cyber Assets quarterly, and update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, or any change in the access rights of such personnel. The Responsible Entity shall ensure access list(s) for contractors and service vendors are properly maintained.**

**R4.2. The Responsible Entity shall revoke such access to Critical Cyber Assets within 24 hours for personnel terminated for cause and within seven calendar days for personnel who no longer require such access to Critical Cyber Assets.**

(Footnote added).

**VIOLATION DESCRIPTION**

**WECC conducted a CIP Spot-Check on URE. WECC reviewed four lists of personnel with access to Critical Cyber Assets provided by URE dated June 18, 2008, September 5, 2008, January 8, 2009, and May 18, 2009. WECC determined that URE did not review its list of personnel with access to Critical Cyber Assets in the fourth quarter of 2008, as required by the Reliability Standard.**

**RELIABILITY IMPACT STATEMENT- POTENTIAL AND ACTUAL**

**The violation posed a minimal risk to the reliability of the bulk power system (BPS) because URE did perform periodic reviews of the list, only not at the frequency required by the Standard. URE did conduct quarterly reviews prior to and following the period of noncompliance, missing the fourth Quarter 2008 review period by only eight days.**

**II. DISCOVERY INFORMATION**

**METHOD OF DISCOVERY**

- SELF-REPORT
- SELF-CERTIFICATION
- COMPLIANCE AUDIT
- COMPLIANCE VIOLATION INVESTIGATION
- SPOT CHECK
- COMPLAINT
- PERIODIC DATA SUBMITTAL
- EXCEPTION REPORTING

**PRIVILEGED AND CONFIDENTIAL INFORMATION  
HAS BEEN REMOVED FROM THIS PUBLIC VERSION**

Attachment b.4

DURATION DATE(S) **1/1/09 (when 4<sup>th</sup> Quarter of 2008 was over without URE reviewing its Access list) through 11/17/09 (Mitigation Plan completion)**

DATE DISCOVERED BY OR REPORTED TO REGIONAL ENTITY **Spot Check**

IS THE VIOLATION STILL OCCURRING      YES       NO   
IF YES, EXPLAIN

REMEDIAL ACTION DIRECTIVE ISSUED      YES       NO   
PRE TO POST JUNE 18, 2007 VIOLATION      YES       NO

**III. MITIGATION INFORMATION**

FOR FINAL ACCEPTED MITIGATION PLAN:

MITIGATION PLAN NO.      **MIT-08-2230**  
DATE SUBMITTED TO REGIONAL ENTITY      **11/24/09**  
DATE ACCEPTED BY REGIONAL ENTITY      **12/28/09**  
DATE APPROVED BY NERC      **1/5/10**  
DATE PROVIDED TO FERC      **1/5/10**

IDENTIFY AND EXPLAIN ALL PRIOR VERSIONS THAT WERE ACCEPTED OR REJECTED, IF APPLICABLE

MITIGATION PLAN COMPLETED      YES       NO

EXPECTED COMPLETION DATE **Submitted as complete**  
EXTENSIONS GRANTED  
ACTUAL COMPLETION DATE      **11/17/09**

DATE OF CERTIFICATION LETTER      **11/24/09**  
CERTIFIED COMPLETE BY REGISTERED ENTITY AS OF      **11/17/09**

DATE OF VERIFICATION LETTER      **12/31/09**  
VERIFIED COMPLETE BY REGIONAL ENTITY AS OF      **11/17/09**

ACTIONS TAKEN TO MITIGATE THE ISSUE AND PREVENT RECURRENCE

**URE made improvements to its database to better differentiate between classifications of employees and the precise type of access granted to an employee. URE also set up electronic reminders at quarterly intervals to ensure access list reviews are performed on a timely basis.**



**PRIVILEGED AND CONFIDENTIAL INFORMATION  
HAS BEEN REMOVED FROM THIS PUBLIC VERSION**

Attachment b.4

LIST OF EVIDENCE REVIEWED BY REGIONAL ENTITY TO EVALUATE COMPLETION OF MITIGATION PLAN OR MILESTONES (FOR CASES IN WHICH MITIGATION IS NOT YET COMPLETED, LIST EVIDENCE REVIEWED FOR COMPLETED MILESTONES)

- **Calendar task reminders placed on the responsible reviewer's calendar**
- **Table of access items**
- **Categories table for the CIP Electronic Security Perimeter (ESP) group access**

EXHIBITS:

SOURCE DOCUMENT

**WECC's Regional Determination of Alleged Violation Summary for CIP-004-1 R4 discovery**

MITIGATION PLAN

**URE's Mitigation Plan MIT-08-2230 for CIP-004-1 R4**

CERTIFICATION BY REGISTERED ENTITY

**URE's Certification of Mitigation Plan Completion for CIP-004-1 R4**

VERIFICATION BY REGIONAL ENTITY

**WECC's Notice of Mitigation Plan and Completed Mitigation Plan Acceptance**