

August 31, 2012

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

**Re: NERC Full Notice of Penalty regarding Unidentified Registered Entity,
FERC Docket No. NP12-_-000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this Notice of Penalty¹ regarding Unidentified Registered Entity (URE), NERC Registry ID# NCRXXXXX, 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)).²

URE self-reported a violation³ of CIP-004-3 Requirement (R) 4⁴ for failing to update its list of personnel with authorized access to Critical Cyber Assets (CCAs) within seven calendar days of any change of personnel, or any change in the access rights of such personnel. In addition, URE failed to revoke access to such CCAs within seven calendar days for personnel who no longer required such access to the CCAs.

¹ *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).

² See 18 C.F.R § 39.7(c)(2).

³ 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.

⁴ The Settlement Agreement only references CIP-004-3; however, this violation spans from CIP-004-2 through CIP-004-3. For ease of reference, CIP-004-3 will be used throughout the document.

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URE self-certified a violation of PRC-005-1 R2.1 for failing to maintain and test Protection System⁵ devices within defined intervals.

This Notice of Penalty is being filed with the Commission because the 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-004-3 R4 and PRC-005-1 R2.1. According to the Settlement Agreement, URE agrees and stipulates to the facts of the violations and has agreed to the assessed penalty of seventy thousand dollars (\$70,000), 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 Identification Numbers WECC201102832 and WECC201102431 are being filed in accordance with the NERC Rules of Procedure and the CMEP.

Statement of Findings Underlying the Violations

This Notice of Penalty incorporates the findings and justifications set forth in the Settlement Agreement executed on November 7, 2011, by and between WECC and URE, which is included as Attachment a. The details of the findings and basis for the penalty are set forth in the Settlement Agreement and herein. This Notice of Penalty 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 (2011), NERC provides the following summary table identifying each violation of a Reliability Standard resolved by the Settlement Agreement, as discussed in greater detail below.

Region	Registered Entity	NOC ID	NERC Violation ID	Reliability Std.	Req. (R)	VRF	Total Penalty
Western Electricity Coordinating Council	Unidentified Registered Entity	NOC-1073	WECC201102832	CIP-004-3	4	Lower	\$70,000
			WECC201102431	PRC-005-1	2/2.1	High ⁶	

⁵ The NERC Glossary of Terms Used in Reliability Standards defines Protection System as "Protective relays, associated communication systems, voltage and current sensing devices, station batteries and DC control circuitry."

⁶ PRC-005-1 R2 has a "Lower" VRF; PRC-005-1 R2.1 and R2.2 each have a "High" VRF. In the context of this case, WECC determined the violation applied to PRC-005-1 R2.1, and a "High" VRF is appropriate.

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WECC201102832 CIP-004-3 R4

The purpose statement of Reliability Standard CIP-004-3 provides:

Standard CIP-004-3 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-004-3 should be read as part of a group of standards numbered Standards CIP-002-3 through CIP-009-3.

CIP-004-3 R4 provides:

R4. Access – The Responsible Entity^[7] shall maintain list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets.

R.4.1. 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.

R.4.2. 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.

CIP-004-3 R4 has a “Lower” Violation Risk Factor (VRF) and a “Moderate” Violation Severity Level (VSL).

URE self-reported a violation of CIP-004-3 R4. According to the Self-Report, URE failed to update its list of personnel with authorized access to CCAs within seven calendar days of any change of personnel, or any change in the access rights of such personnel. In addition, URE failed to revoke access to such CCAs within seven calendar days for personnel who no longer required such access to the CCAs.

⁷ Within the text of Standard CIP-002, “Responsible Entity” shall mean Reliability Coordinator, Balancing Authority, Interchange Authority, Transmission Service Provider, TO, Transmission Operator, Generator Owner, Generator Operator, LSE, NERC, and Regional Reliability Organizations.

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Six weeks later, a WECC subject matter expert (SME) discussed the violation with URE. During the discussion, URE stated that in two separate instances, access to CCAs was not revoked for three employees. The first instance occurred after a project was completed and the employee no longer needed access to the CCAs. The employee's supervisor informed URE's service desk of the change in status and requested an access revocation ticket to be initiated. The second instance involved two employees. Similar to the first instance, the employees' supervisor filed a request with the service desk to revoke CCA access due to project completion.

The service desk personnel failed to process the access revocation tickets and forward the access revocation tickets to the appropriate access custodians to end physical access to the CCAs. As a result, physical access to CCAs was not removed within seven calendar days for three employees who no longer needed access. For these reasons, the SME determined that URE had a possible violation of CIP-004-3 R4. The SME forwarded the findings to the WECC Enforcement Department (WECC Enforcement) for its review and consideration.

WECC Enforcement determined that URE had updated its access lists within seven calendar days of changes to personnel access rights to CCAs, but had failed to implement revocation of physical access for the change in access rights. Specifically, URE revoked physical access to CCAs for two employees two months after the second instance and the remaining employee eight months after the first instance. Although the Notice of Alleged Violation had alleged URE to be in violation of CIP-004 R4.1, WECC Enforcement determined the access lists were sufficient in documenting the change in access to CCAs within seven calendar days from when the access rights were changed. As a result, WECC did not find a violation of CIP-004-3 R4.1, but determined URE to be in violation of CIP-004-3 R4.2.

WECC determined that URE had a violation of CIP-004-3 R4 for failing to update its list of personnel with authorized access to CCAs, as well as revoke access to CCAs, as required by the Standard.

WECC determined the duration of the violation to be from when URE first failed to revoke and update access to CCAs within seven calendar days as required by the Standard, through when URE revoked access for the last identified employee.

WECC determined that this violation posed a minimal, not serious or substantial, risk to the reliability of the bulk power system (BPS) because the employees in scope had only physical access to CCAs and had current personnel risk assessments and training. In addition, URE's dual authentication feature at URE's plant requires operators to verify and allow access into the Physical Security Perimeter. Further, although the access rights were not updated timely, the affected personnel did not try to access the CCAs at any time after the authorized access expired.

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WECC201102431 PRC-005-1 R2.1

The purpose statement of Reliability Standard PRC-005-1 provides: “To ensure all transmission and generation Protection Systems affecting the reliability of the Bulk Electric System (BES) are maintained and tested.”

PRC-005-1 R2 provides in pertinent part:

R2. Each Transmission Owner and any Distribution Provider that owns a transmission Protection System and each Generator Owner that owns a generation Protection System shall provide documentation of its Protection System maintenance and testing program and the implementation of that program to its Regional Reliability Organization on request (within 30 calendar days). The documentation of the program implementation shall include:

R2.1. Evidence Protection System devices were maintained and tested within the defined intervals.

PRC-005-1 R2.1 has a “High” VRF and a “High” VSL.

WECC notified URE that WECC was initiating the Self-Certification process. Three weeks before the Self-Certification submittal was due, URE submitted a Self-Report addressing a possible violation of PRC-005-1 R2.1. Nine days later, URE submitted its Self-Certification. Although URE self-reported this violation, because URE self-reported during the Self-Certification submission period, the discovery method for this violation is classified as Self-Certification.

The following month, a WECC SME reviewed the Self-Certification and requested additional maintenance and testing data from URE's compliance staff. On two dates, URE responded to WECC's data request. The response included a complete listing of the date last tested and previous dates of all transmission and generation protective devices applicable to PRC-005-1. Of these devices, URE reported its noncompliance for 71% of its relay Protection System devices and 68% of its voltage and current sensing devices.

Based on the response, the SME determined URE's noncompliance related to URE's relays and voltage and current sensing devices, but not URE's batteries, DC circuitry, or associated communication systems. Additionally, URE provided its maintenance and testing procedures, which outlined the maintenance and testing steps for URE's Protection System devices. Specifically, the WECC SME determined URE failed to verify voltage and current sensing devices inputs and failed to conduct

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overall operational testing that includes tripping associated power circuit breakers for its digital, electronic and electromechanical relays, and voltage and current sensing devices. The SME reviewed URE's records and determined that URE failed to maintain and test 71% of its relays and 68% of its voltage and current sensing devices in accordance with URE's maintenance and testing program (specifically, URE could not demonstrate it conducted two of its nine maintenance and testing tasks, as described above, within the intervals defined in URE's maintenance and testing program). For these reasons, the SME determined that URE had a violation of PRC-005-1 R2.1. The SME forwarded the findings to WECC Enforcement for review. WECC Enforcement confirmed these findings.

WECC determined that URE had a violation of PRC-005-1 R2.1 for failing to maintain and test its Protection System devices within the intervals defined by its Protection System maintenance and testing program.

WECC determined the duration of the violation to be from the first day following Certification of Mitigation Plan Completion for URE's prior pre-June 18, 2007 PRC-005-1 R2 violation, through when URE completed its Mitigation Plan.

WECC Enforcement determined that this violation posed a moderate, not serious or substantial, risk to the reliability of the BPS because of several mitigating reasons. Although URE failed to maintain and test 71% of its relays and 68% of its voltage and current sensing devices in accordance with its program, URE did maintain and test 100% of its devices in accordance with industry practices. Specifically, URE verified existing (as-found) relay settings against the defined relay settings and the operation of all relay inputs and outputs that are used in the scheme deployed, thus ensuring the Protection System is set to trip as designed.

Pursuant to NERC's *Protection System Maintenance, A Technical Reference* (September 13, 2007), URE did follow general utility practices when implementing its maintenance and testing program for its Protection System, including URE's relays and voltage and current sensing devices. In this case, URE did not implement two of its nine maintenance and testing tasks. Specifically, URE failed to (1) verify current transformer (CT) and voltage transformer (VT) inputs and (2) failed to complete an overall operational test that includes tripping associated power circuit breakers (PCB). Regarding the CT and VT inputs, per common industry practice, URE did verify that voltage and current sensing device signals are received at the relay; however, URE's program included an additional method to maintain and test its voltage and current sensing devices which is not a common industry practice (URE's program included a provision to verify the accuracy of the voltage and current signal).

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Regarding the overall operation tests, it is not a common industry practice to trip the PCB when maintaining and testing Protection System devices; however, URE did conduct maintenance and testing to verify the devices operate in a manner that ensures the reliable operation of the Protection System. Additionally, URE had alarms for loss of integrity of Protection System circuits (including voltage sensing devices and relay circuitry). These alarms would notify URE staff if the Protection System devices may not be in an operable condition. Therefore, WECC determined URE minimized the likelihood of Protection System failure as a result of the maintenance performed and the installed alarms as described above.

Regional Entity's Basis for Penalty

According to the Settlement Agreement, WECC has assessed a penalty of seventy thousand dollars (\$70,000) for the referenced violations. In reaching this determination, WECC considered the following factors: (1) URE was cooperative throughout the compliance enforcement process; (2) URE self-reported the CIP-004-3 R4 violation; (3) certain aspects of URE's internal compliance program;⁸ (4) there was no failure by URE to comply with applicable compliance directives; (5) there was no evidence of an intentional violation or an attempt by URE to conceal a violation; (6) WECC determined that the violations did not pose a serious or substantial risk to the reliability of the BPS; and (7) WECC considered as an aggravating factor URE's prior violation history.

After consideration of the above factors, WECC determined that, in this instance, the penalty amount of seventy thousand dollars (\$70,000) is appropriate and bears a reasonable relation to the seriousness and duration of the violations.

Status of Mitigation Plan⁹

WECC201102832 CIP-004-3 R4

URE's Mitigation Plan to address its violation of CIP-004-3 R4 was submitted to WECC on August 29, 2011 with a proposed completion date of January 31, 2012. The Mitigation Plan was accepted by WECC on September 21, 2011 and approved by NERC on October 19, 2011. The Mitigation Plan for this violation is designated as WECCMIT005896 and was submitted as non-public information to FERC on October 20, 2011 in accordance with FERC orders.

⁸ WECC considered that URE had an internal compliance program (ICP) and determined the ICP to be a mitigating factor in assessing the penalty.

⁹ See 18 C.F.R § 39.7(d)(7).

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URE's Mitigation Plan required URE to complete the following four phases:

1. Identify and mitigate additional risks to the BPS resulting from the violation and execution of this Mitigation Plan. Update the service desk's auto-reply emails with clearer guidance for requesting access removal. Implement daily reviews of service desk tickets and emails for access removal requests;
2. Conduct a detailed assessment of URE's access management processes with a focus on regulatory alignment, effectiveness, monitoring capabilities and process improvement opportunities. Verify and update business requirements for access management inclusive of NERC CIP Standards. Perform gap analysis of current processes to updated requirements. Identify process remediation and improvement opportunities based on gap analysis results. Validate proposed process changes with organizational stakeholders;
3. Modify existing access management processes based on phase II deliverables and develop implementation project plan. Process all engineering activities determined by phase II deliverables; and
4. Implement and execute implementation project plan activities determined by phase III deliverables.

URE certified that the above Mitigation Plan requirements were completed. As evidence of completion of its Mitigation Plan, URE submitted the following:

1. Screen shots showing that access was revoked for the employees in scope;
2. URE's Information Technology access remediation document; and
3. URE's access management process documents.

After WECC's review of URE's submitted evidence, WECC verified that URE's Mitigation Plan was completed.

WECC201102431 PRC-005-1 R2.1

URE's Mitigation Plan to address its violation of PRC-005-1 R2.1 was submitted to WECC on April 19, 2011 with a proposed completion date of September 30, 2011. The Mitigation Plan was accepted by WECC on May 4, 2011 and approved by NERC on June 29, 2011. The Mitigation Plan for this violation is designated as MIT-07-3757 and was submitted as non-public information to FERC on June 29, 2011 in accordance with FERC orders.

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URE's Mitigation Plan required URE to:

1. Conduct internal and external reviews of the Protection System maintenance and testing program and maintenance/testing activities. These reviews were designed to identify gaps and address specific areas that need improvement. The internal review involved both protection engineering staff and relay maintenance field personnel. The external review was conducted by a third-party contractor;
2. Revise steps of maintenance procedures to be practical and effective for relay systems without need of functional test;
3. Revise steps of procedures to clearly specify activities required, create work instructions for each procedure that describe how work is accomplished, and train field crews on procedure steps and work instructions;
4. Create and use logging sheets to track all procedure steps or readings;
5. Develop inventory and maintenance tracking lists that provide visibility for Protection System elements including DC protection and control circuits and instrument transformers; and
6. Re-test, per the revised maintenance procedures, 71% of the relays and 68% of the instrument transformers with missed steps under the old procedures.

URE certified that the above Mitigation Plan requirements were completed. As evidence of completion of its Mitigation Plan, URE submitted a Mitigation Plan completion narrative, as well as 29 attachments. These attachments included a PRC-005 internal investigation summary, a copy of Protection System devices, all Protection System device summaries, maintenance/testing procedures, relay work practices, training materials and Protection System device tests for all 5 Protection System devices.

After WECC's review of URE's submitted evidence, WECC verified that URE's Mitigation Plan was completed.

Statement Describing the Assessed Penalty, Sanction or Enforcement Action Imposed¹⁰

Basis for Determination

Taking into consideration the Commission's direction in Order No. 693, the NERC Sanction Guidelines and the Commission's July 3, 2008, October 26, 2009 and August 27, 2010 Guidance Orders,¹¹ the

¹⁰ See 18 C.F.R. § 39.7(d)(4).

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NERC BOTCC reviewed the Settlement Agreement and supporting documentation on August 14, 2012. The NERC BOTCC approved the Settlement Agreement, including WECC's assessment of a seventy thousand dollar (\$70,000) 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. One violation constituted URE's second occurrence of violation of the subject NERC Reliability Standard;
2. URE self-reported the CIP-004-3 R4 violation;
3. WECC reported that URE was cooperative throughout the compliance enforcement process;
4. URE had a compliance program which WECC considered a mitigating factor, as discussed above;
5. there was no evidence of any attempt to conceal a violation nor evidence of intent to do so;
6. WECC determined that the violations did not pose a serious or substantial risk to the reliability of the BPS, as discussed above; and
7. 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 seventy thousand dollars (\$70,000) 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 Notice of Penalty 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

¹¹ *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).

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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 part of this Notice of Penalty are the following documents:

- a) Settlement Agreement by and between WECC and URE executed on November 7, 2011, included as Attachment a;
- b) Record documents for CIP-004-3 R4, included as Attachment b:
 1. URE's Self-Report;
 2. URE's Mitigation Plan;
 3. URE's Certification of Mitigation Plan Completion; and
 4. WECC's Verification of Mitigation Plan Completion.
- c) Record documents for PRC-005-1 R2.1, included as Attachment c:
 1. URE's Self-Certification;
 2. URE's Mitigation Plan;
 3. URE's Certification of Mitigation Plan Completion; and
 4. WECC's Verification of Mitigation Plan Completion.

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A Form of Notice Suitable for Publication¹²

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

¹² See 18 C.F.R § 39.7(d)(6).

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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 North American Electric Reliability Corporation 3353 Peachtree Road NE Suite 600, North Tower Atlanta, GA 30326 (404) 446-2560</p>	<p>Rebecca J. Michael* Associate General Counsel for Corporate and Regulatory Matters Sonia C. Mendonça* Attorney North American Electric Reliability Corporation 1325 G Street N.W. Suite 600</p>
<p>Charles A. Berardesco* Senior Vice President, General Counsel, and Corporate Secretary North American Electric Reliability Corporation 1325 G Street N.W., Suite 600 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile charlie.berardesco@nerc.net</p>	<p>Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile rebecca.michael@nerc.net sonia.mendonca@nerc.net</p>
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*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.

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Conclusion

NERC respectfully requests that the Commission accept this Notice of Penalty as compliant with its rules, regulations and orders.

Respectfully submitted,

/s/ Rebecca J. Michael

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and Regulatory Matters
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cc: Unidentified Registered Entity
Western Electricity Coordinating Council

Attachments