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

Request for an Interpretation of a Reliability Standard

Date submitted: 2/24/11

Contact information for person requesting the interpretation:

Name: John Rhea

Organization: OGE Energy Corp.

Telephone: 405-553-3445

E-mail: rheajd@oge.com

Identify the standard that needs clarification:

Standard Number (include version number): CIP-002-3
 (example: PRC-001-1)

Standard Title: Cyber Security – Critical Cyber Asset Identification

Identify specifically what requirement needs clarification:

Requirement Number and Text of Requirement:

CIP-002-3 R1.2.5 - Systems and facilities critical to automatic load shedding under a common control system capable of shedding 300 MW or more.

Clarification needed: Based on the text above, an auditor could apply this standard to the Smart Grid Advanced Meter Infrastructure (AMI) remote connect/disconnect functionality. While the AMI system is not designed to perform automatic load shedding of 300 MW it could be repurposed to shed an aggregate load of 300 MW or more. However, it is important to note that the AMI remote disconnect function is not used for under-voltage load shedding or under-frequency load shedding as a part of the region's load shedding program.

The primary purpose of the AMI remote connect/disconnect function is to connect and disconnect individual retail electric customers from a central location rather than at the meter itself to enable substantial efficiency gains.

OGE would like NERC to clarify that a company's SmartGrid AMI functionality, which may be able to disconnect 300+ MW of load, is not considered a system or facility critical to automatic load shedding under a common control system capable of shedding 300 mw and therefore it should not be included in the Company's risk based methodology. OGE believes this clarification is appropriate because CIP-002-3 R1.2.5 was written to address under-voltage and under-frequency load shedding systems; SmartGrid AMI disconnect functionality pertains to neither.

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.

The AMI Remote Disconnect function has no impact on OGE's ability to participate in SPP's load shedding program. The cost of compliance for OGE alone is in the millions of dollars without any significant benefit to the reliability of the Bulk Electric System.