

# NSRS Summary of Topics –October 9, 2009

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“V”	Vote
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## NERC Project 2006-02 Assess Transmission & Future Needs

C 10/16/09

A fourth comment period has opened for the **NERC project 2006-02 (“Assess Transmission Future Needs”)**; The applicable entities are **PC & TP**.

TPL-001-1 merges the requirements of four existing standards: TPL-001-0, TPL-002-0, TPL-003-0, TPL-004-0, TPL-005-0, and TPL-006-0. This posting includes numerous revisions to the actual standard based on industry comments; plus, it also includes the standard draft team’s response to industry comments.

## TIER Report

C 10/23/09

FERC posted a [notice](#) of a public meeting (10:00 AM – 12:00 NOON EDT)([webcast](#)) for September 22, 2009, (*RM06-16-000-Mandatory Reliability Standards for the Bulk-Power System*) to present research conducted by the University of Wisconsin-Madison on Topological and Impedance Element Rank (TIER) of the Bulk-Power System. **According to FERC, the project may lead to a methodology that could be used in future proceedings to aid in refining the scope of what constitutes the Bulk-Power System, subject to section 215 of FPA.**

FERC’s Office of Electric Reliability initiated the project. (The notice does not state when the project was initiated and a search through the docket for the past year revealed nothing.) Essentially, the point of the project is to develop a methodology to aid in ranking the elements of the Bulk-Power System.

Specifically, OER is seeking to (1) develop a process to distinguish facilities that should and should not be considered part of the Bulk-Power System; (2) identify the elements needed to operate each of the electric interconnections; and (3) rank the importance of those elements. The OER and University of Wisconsin has developed and tested a mathematically based model to reflect the physics of the Bulk-Power System.

FERC has posted the [TIER report](#) and comments will be accepted, by FERC, on this report by the end of the business day on October 13, 2009 (FERC).

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## NERC Project 2007-07 Vegetation Management

C 10/24/09

A comment period has opened for NERC project [2007-07](#) (“Transmission Vegetation Management”); **TO & PC are applicable.**

The SDT has incorporated several issues into the draft 2 standard (FAC-003-2):

- FERC Order 693 items.
- Procedural items such as assigning Time Horizons, Violation Severity Levels, Violation Risk Factors, etc.
- Stake holder comments such as:
  - Development of a “white paper” to aid in understanding the technical basis for the standard.
  - Review reporting criteria for Category 3 outages in the proposed technical reference material and may remove the reporting requirement of Category 3 outages in R.3 and R.4.
  - Consider deleting requirement R.4.

Review the reporting exemptions to include all category outages under major disasters in Requirement R3.2.

## Project 2007-06 System Protection Coordination

C 10/26/09

A comment period has opened for the first draft of the NERC Standard PRC-001-2 (“System Protection Coordination”). **This standard is applicable to TO, GO, & select DPs.**

The Standard Drafting Team (NERC Project [2007-06](#)) took the NERC Standard PRC-001-1 (“System Protection Coordination”) and incorporated the following issues:

- Assure that Protection System application and performance issues are coordinated among all related entities.
- Correct the applicable entities within the standard to reflect the actual functional responsibilities, as described in the NERC Functional Model.
- Incorporate other general improvements described in the standards development work plan and from other sources.

Address directives received from ERO regulatory authorities.

## Functional Model Version 5

C 10/26/09

A comment period has opened for the [NERC Functional Model and the Functional Model Technical Document](#). **All entities are applicable.**

The Functional Model Working Group reviewed comments, from the initial comment period, and incorporated changes to the following topics:

- Consideration of comments from Planning Committee regarding Demand Resources function and associated responsible entities
- Review of all planning functions and respective responsible entities
- Review of Interchange function and Interchange Authority as the responsible entity
- Review of Load Serving Entity and Distribution Provider
- Review of terminology and definitions for consistency with other NERC documents

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<b>Project 2007-02</b> <b>Operating Personnel Communication Protocols</b>	<b>C 11/16/09</b>
<p>A comment period has opened for the new standard <a href="#">COM-003-1</a>. <b>Applicable entities are: RC, BA, TO, TOP, GOP, DP, TSP, and LSE.</b></p> <p>The communication portion of Blackout Recommendation #26 is addressed in this project (but this project excludes any hardware recommendations) and the establishment of clear definitions of normal, alert, emergency operational system conditions, various roles and responsibilities of entities as eluted to in the Blackout Recommendation #20 (The Reliability Coordinator Working Group’s Alert Level Guide document elaborates on what would be clear and efficient communication and they have added this guide as an attachment to this standard.) is addressed in this project. This project addresses issues proposed in FERC final order 693. Also, COM-001-1 R4, COM-002-2 R2, and TOP-002-2 R18 will be moved into this new standard. This project also proposes new terms to the NERC Glossary of Terms: Communications Protocol, Three-part Communication, Interoperability Communication, and Directive. For example, a Directive would be an order or instruction initiated by system operating personnel where the recipient is required to perform an action to change the state or the status of a Bulk Electric System Element or Facility.</p>	
<b>PRC-002-NPCC-1</b> <b>(“Disturbance Monitoring”)</b>	<b>C 11/16/09</b>
<p>This regional standard (<a href="#">PRC-002-NPCC-1</a>) will ensure that adequate disturbance data is available to facilitate NPCC’s Bulk Electric System event analyses. Applicable entities are NPCC’s TO, GO, and RC.</p> <p>Although this standard will apply to NPCC, NERC plans to insert the terms used in this regional standard into the NERC Glossary of Terms plus if this standard is approved by FERC it will be a benchmark for comparison to develop like regional standards from other regions.</p>	
<b>Project 2009-09</b> <b>(“Interpretation of CIP-001-1 R2 By Covanta Energy”)</b>	<b>V 10/07/09</b>
<p>This is a recirculation ballot for which <i>Covanta Energy</i> is requested an interpretation of <i>CIP-001-1 R2</i> (<a href="#">Project 2009-09</a>) on two points (All entities are applicable):</p> <p><b>Question:</b> Please clarify what is meant by the term, “appropriate parties.” Moreover, who within the Interconnection hierarchy deems parties to be appropriate?</p> <p><b>Interpretation:</b> CIP-001-1 R2 refers collectively to entities with whom the reporting party has responsibilities and/or obligations for the communication of physical or cyber security event information. Those entities to which communicating sabotage events are appropriate would be identified by the reporting entity and documented within the procedure required in CIP-001-1 R2.</p> <p>Regarding “who within the Interconnection hierarchy deems parties to be appropriate,” the drafting team knew of no interconnection authority that has such a role.</p>	
<b>Project 2008-10</b> <b>(“Interpretation of CIP-006-1 R1.1 By Progress Energy”)</b>	<b>V 10/09/09</b>
<p>The Cyber Security Order 706 SAR drafting team in response to industry comments received</p>	

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from the initial ballot has [revised](#) the previously posted interpretation to read: (All entities are applicable.)

**Interpretation of CIP-006-1 Requirement R1.1:** *“...to ensure and document that all Cyber Assets within an Electronic Security Perimeter (ESP) also reside within an identified Physical Security Perimeter. Progress Energy requests an interpretation as to the applicability of CIP-006-1 R1 to the aspects of the wiring that comprises the ESP.*

**Revised Response:**

The definition of Cyber Asset in the *NERC Glossary of Terms Used in Reliability Standards* includes communication networks. Physical media (wiring) is a component of a communication network within an Electronic Security Perimeter, but the wiring itself is not a separate Cyber Asset.

The specific situation described by Progress Energy involves physically separate Critical Cyber Assets connected by wiring inside the Electronic Security Perimeter. Since the connective wiring is inside the Electronic Security Perimeter, Requirement R1.1 of CIP-006-1 applies.

CIP-006-1 R1.1 also provides: “Where a completely enclosed (“six-wall”) border cannot be established, the Responsible Entity shall deploy and document alternative measures to control physical access to the Critical Cyber Assets.” For wiring within the Electronic Security Perimeter that is external to a Physical Security Perimeter, the alternative measures may be physical or logical, on the condition that they provide effective security, i.e., equivalent to or better than a completely enclosed (“six-wall”) border: alternative physical control measures may include, but are not limited to, multiple physical access control layers within a non-public, controlled space; alternative logical control measures may include, but are not limited to data encryption, and/or circuit monitoring to detect unauthorized access or physical tampering.