

Unofficial Comment Form for Project 2009-01 — SAR for Disturbance and Sabotage Reporting

Please **DO NOT** use this comment form. Please use the [electronic comment form](#) located at the link below to submit comments on the proposed SAR for revisions to the existing Disturbance and Sabotage Reporting standards. Comments must be submitted by **May 21, 2009**. If you have questions please contact Stephen Crutchfield at Stephen.crutchfield@nerc.net or by telephone at 609-651-9455.

http://www.nerc.com/filez/standards/Project2009-01_Disturbance_Sabotage_Reporting.html

Background Information

This project will entail revision to the following existing standards:

- CIP-001-1 — Sabotage Reporting
- EOP-004-1 — Disturbance Reporting

Stakeholders have indicated that identifying potential acts of “sabotage” is difficult to identify in real-time, and additional clarity is needed to identify thresholds for reporting potential acts of sabotage in CIP-001-1. Stakeholders have also reported that EOP-004-1 has some requirements that reference out-of-date Department of Energy forms, making the requirements ambiguous. EOP-004 also has some ‘fill-in-the-blank’ components to eliminate.

The project will include addressing previously identified stakeholder concerns and FERC directives, will bring the standards into conformance with the latest approved version of the ERO Rules of Procedure, and may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

Unofficial Comment Form — Project 2009-01 — SAR for Disturbance and Sabotage Reporting

***Please use the electronic comment form to submit your final responses to NERC.**

1. Do you agree that there is a reliability-related reason to support modifying CIP-001-1 and EOP-004-1? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the scope of the proposed SAR? If not, please explain what should be added or deleted to the proposed scope.

Yes

No

Comments: The MRO NSRS would like to keep the references to the DOE reporting form.

3. Are you aware of any associated business practices that we should consider with this SAR? If yes, please explain in the comment area.

Yes

No

Comments:

If the SDT defines what Sabotage is, then it may impact what is currently written. For example, attachment TOP-005-0, section 2.9 speaks of "Multi-site sabotage" with no definition. Please give consideration to all places where defining Sabotage could make an impact of any kind.

4. CIP-001-1 applies to the Reliability Coordinator, Transmission Operator, Balancing Authority, Generator Operator, and the Load-serving Entity. EOP-004-1 applies to the same entities, plus the Regional Reliability Organization. Do you agree with the applicability of the existing CIP-001-1 and the existing EOP-004-1? If no, please identify what you believe should be modified.

Yes

No

Comments: As FERC has directed, the RRO should be removed since they are not owners or operators of the BES.

5. If you have any other comments on the SAR or proposed modifications to CIP-001-1 and EOP-004-1 that you haven't provided in response to the previous questions, please provide them here.

Comments:

A. The SAR states that there may be impact on a related standard, COM-003-1 (page SAR-5). Is the SDT referring to Project 2007-02, Operating Personnel Communication Protocols? If so, this is a SAR too and should not be used as a reference.

Unofficial Comment Form — Project 2009-01 — SAR for Disturbance and Sabotage Reporting

B. CIP-001-1 and EOP-004-1 should be combined into one EOP Standard.

C. Within EOP-004-1 there is industry confusion on what form to submit in the event of an event. There should only be one form for the new combination Standard eliminating the need for reporting form attachments. It should be the DOE Form, OE-417. Although it is beyond the scope of this SAR, it would greatly benefit industry if there was a central location on the NERC website containing ALL reporting forms, including FERC, NERC, DOE, and ESIAC. This would enable the System Operators to efficiently locate the most current version of the appropriate form in order to report events.

D. The word Disturbance is primarily used in other Standards as in, Disturbance Control Standard or system separation due to a disturbance. Should the NERC definition be updated? Should the word "Sabotage" be defined by NERC? Additionally, we recommend that one definition of "Sabotage" be utilized industry-wide, instead of varying definitions by multiple groups like the DOE, ESIAC, etc.