

Comment Form for the first draft of EOP-004-2 - Impact Event and Disturbance Assessment, Analysis, and Reporting [Project 2009-01]

Please **DO NOT** use this form to submit comments on the proposed reliability standard, EOP-004-2 - Impact Event and Disturbance Assessment, Analysis, and Reporting. Comments must be submitted by **October 15, 2010**. If you have questions please contact Stephen Crutchfield by email at Stephen.crutchfield@nerc.net or by telephone at 609-651-9455.

Background Information:

NERC established a SAR Team in 2009 to investigate revisions to the CIP-001 and EOP-004 Reliability Standards.

1. CIP-001 may be merged with EOP-004 to eliminate redundancies.
2. Acts of sabotage have to be reported to the DOE as part of EOP-004.
3. Specific references to the DOE form need to be eliminated.
4. EOP-004 has some 'fill-in-the-blank' components to eliminate.

The development 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 (see tables for each standard at the end of this SAR for more detailed information).

The SAR for Project 2009-01, Disturbance and Sabotage Reporting was moved forward for standard drafting by the NERC SC in August of 2009. The Disturbance and Sabotage Reporting Standard Drafting Team (DSR SDT) was formed in late 2009. A "concepts paper" was designed to solicit stakeholder input regarding the proposed reporting concepts that the DSR SDT has developed.

The concept paper sought comments from stakeholders on the "road map" that will be used by the SDR SDT in updating or revising CIP-001 and EOP-004. The concept paper provided stakeholders the background information and thought process of the SDR SDT.

The DSR SDT has reviewed the existing standards, the SAR, issues from the NERC database and FERC Order 693 Directives in order to determine a prudent course of action with respect to these standards.

The DSR SDT has proposed the following concept for *impact event*:

An impact event is any event that has either impacted or has the potential to impact the reliability of the Bulk Electric System. Such events may be caused by equipment failure or mis-operation, environmental conditions, or human action.

To support this concept, the DSR SDT has provided specific event for reporting including types of impact events and timing thresholds pertaining to the different types of impact events and who's responsibility for reporting under the different impact events. This information is outlined in Attachment 1 to the proposed standard.

The DSR SDT wishes to make clear that the proposed changes do not include any real-time operating notifications for the types of events covered by CIP-001, EOP-004. This is achieved through the RCIS and is covered in other standards (e.g. TOP). The proposed standard deals exclusively with after-the-fact reporting.

The DSR SDT is proposing to consolidate disturbance and impact event reporting under a single standard. These two components and other key concepts are discussed in the following sections.

Summary of Concepts

- A single form to report disturbances and impact events that threaten the reliability of the bulk electric system
- Other opportunities for efficiency, such as development of an electronic form and possible inclusion of regional reporting requirements
- Clear criteria for reporting
- Consistent reporting timelines
- Clarity around of who will receive the information and how it will be used

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the purpose statement of the proposed standard? Please explain in the comment box below.

Yes
 No

Comments: Thank you for the clarification of "known causes", this will allow entities to report what they currently know when submitting an impact report.

2. Do you agree with the applicable entities in the Applicability Section as well as assignment of applicable entities noted in Attachment 1? Please explain in the comment box below.

Yes
 No

Comments: The NSRS believes it is important for the ERO to provide valuable Lessons learned to our electrical industry, thus enhancing the reliability of the BES.

3. Do you agree with the requirement R1 and measure M1? Please explain in the comment box below.

Yes
 No

Comments:

4. Do you agree with the requirement R2 and measure M2? Please explain in the comment box below.

Yes
 No

Comments:

A. As detailed in R2, the Operating Plan shall contain provisions for "identifying, assessing, and reporting impact events". R2.8, and R2.9 do not have a correlation to R2's Operating Plan. Where, R2.7 states to update the Operating Plan when there is a component change. The NSRS believes the components of this Operating Plan are only 1) indentifying impact events, 2) assessing impact events, and 3) reporting impact events. R2.8 and R2.9 are based on Lessons Learned (from internal and external sources) and do not fit in the components of an entity's Operating Plan. R2.7 requires the Operating Plan to be updated. As written, every memo, simulations, blog, etc that contain the words "lessons learned" would be required to

be in your Operating Plan. It is solely up to an entity to implement a "Lesson Learned" and not the place for this SDT to require an Operating Plan to contain Lessons Learned. Recommend that R2.8 and R2.9 be deleted for this requirement. If R2.8 and R2.9 are not removed, R5.3 will be in a constant state of change.

B. In R2.8 & R2.9, It may be difficult to implement lessons learned within 30 days. The NSRS recommends to incorporate lessons learned within 12 calendar months if lesson learned are not deleted from the R2.8 & R2.9.

5. Do you agree with the requirement R3 and measure M3? Please explain in the comment box below.

Yes

No

Comments: The NSRS thanks the SDT for stating "initial probable cause" as this is in direct correlation to the Purpose which states "known causes".

6. Do you agree with the requirement R4 and measure M4? Please explain in the comment box below.

Yes

No

Comments: The NSRS agrees that to enhance reliability and situational awareness of the BES, the Operating Plan be exercised once per calendar year.

7. Do you agree with the requirement R5 and measure M5? Please explain in the comment box below.

Yes

No

Comments: R5.2. The NSRS agrees that to enhance reliability and situational awareness of the BES, the Operating Plan be trained once per calendar year.

R5.3 As detailed in R2, the Operating Plan shall contain provisions for "identifying, assessing, and reporting impact events". Where, R2.7 states to update the Operating Plan when there is a component change. The NSRS believes the components of this Operating Plan are 1) indentifying impact events, 2) assessing impact events, and 3) reporting impact events. These components relate to training when the Operating Plan is revised per, R5.3, only.

As written, every memo, simulations, blog, etc that contain the words "lessons learned" would be required to be in your Operating Plan and trained on every time one was issued or heard about internally or externally. Recommend that the Operating Plan be revised and training occurs when a change occurs to the entity's Operating Plan, consisting of 1) indentifying impact events, 2) assessing impact events, and 3) reporting impact events, only.

8. Do you agree with the requirement R6 and measure M6? Please explain in the comment box below.

Yes

No

Comments:

9. Do you agree with the requirements for the ERO (R7-R8) or is this adequately covered in the [Rules of Procedure \(section 802\)](#)? Please explain in the comment box below.

Yes

No

Comments: Should read "In accordance with Sections 401(2) and 405 of the Rules of Procedures, the ERO can be set as an applicable entity in a requirement or standard". As stated in the text box.

10. Do you agree with the impact event list in Attachment 1? Please explain in the comment box below and provide suggestions for additions to the list of impact events.

Yes

No

Comments: Please provide a phone number and provision within the Note of EOP-004 – Attachment 1: Impact Events table for an entity to contact NERC if unable to contact NERC within the time described.

Voltage Deviations – recommend adding the word "(continuous)" after sustained in Threshold column. This could be interpreted as an aggregate value over any length of time.

Frequency deviations - recommend adding the word "(continuous)" after 15 minutes' in Threshold column. This could be interpreted as an aggregate value over any length of time.

CIP-008 R1.3 states the entity is to report Cyber Security Incidents to the ES_ISAC. Does the EOP-004 Attachment 2 fulfill this requirement?

11. Do you agree with the use of the Preliminary Impact Event Report (Attachment 2)? Please explain in the comment box below.

Yes

No

Comments: Number 4 of the reporting form does not take into consideration of potential impact events. Recommend that "Did the impact event originate in your system?" to "Did the impact event originate or affect your system?". This will provide clarity to entities.

12. The DSR SDT has replaced the terms “disturbance” and “sabotage” with the term “impact events”. Do you agree that the term “impact events” adequately replaces the terms “disturbance” and “sabotage” and addresses the FERC directive to “further define sabotage” in an equally efficient and effective manner? Please explain in the comment box below.

Yes
 No

Comments: As an industry we have looked at sabotage as a sub component of a disturbance. Sabotage is hard to measure since it is based on a perpetrator’s intent and thus very hard to determine.

13. The DSR SDT has combined EOP-004 and CIP-001 into one standard (please review the mapping document that shows the translation of requirements from the already approved versions of CIP-001 and EOP-004 to the proposed EOP-004), EOP-004-3 and retiring CIP-001. Do you agree that there is no reliability gap between the existing standards and the proposed standard? **Please** explain in the comment box below.

Yes
 No

Comments: Within the above question, the SDT is asking about EOP-004-2 not -3.

14. Do you agree with the proposed effective dates? Please explain in the comment box below.

Yes
 No

Comments:

15. Do you have any other comments that you have not identified above?

Yes
 No

Comments: Please provide an e-mail address for the submittal of the report to NERC (and any other parties above a Regional Entity) within this Standard and a fax number as a backup to electronic submittal.

EOP-004 Attachment 2: Impact Event Reporting Form (note in the proposed standards it states EOP-002) seems to be written for Actual Impact Events only. Perhaps another section could be added for “Potential” Impact Events.

