



May 6, 2010

**VIA OVERNIGHT MAIL**

Claudine Dutil-Berry, Secretary of the Board  
National Energy Board  
444 Seventh Avenue SW  
Calgary, Alberta  
T2P 0X8

Re: *North American Electric Reliability Corporation*

Dear Ms. Dutil-Berry:

The North American Electric Reliability Corporation (“NERC”) hereby submits this petition seeking approval for interpretation of Requirement R2 in FERC-approved NERC Reliability Standard CIP-001-1 — Sabotage Reporting, Requirement R2, as set forth in **Exhibit A** to this petition. Upon approval, the standard that includes the interpretation will be referred to as CIP-001-1a.

The interpretation was approved by the NERC Board of Trustees on February 16, 2010. NERC requests this interpretation be made effective immediately upon approval.

NERC’s petition consists of the following:

- This transmittal letter;
- A table of contents for the filing;
- A narrative description explaining how the interpretation meets the reliability goal of the standard involved;
- Interpretation of CIP-001-1 — Sabotage Reporting, Requirement R2 submitted for approval (**Exhibit A**);
- Reliability Standard CIP-001-1a — Sabotage Reporting, that includes the appended interpretation (**Exhibit B**);
- The complete development record of the interpretation (**Exhibit C**); and

- A roster of the interpretation development team (**Exhibit D**).

Please contact the undersigned if you have any questions.

Respectfully submitted,

/s/ Holly A. Hawkins

Holly A. Hawkins

*Attorney for North American Electric  
Reliability Corporation*



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|      | Exhibit D — Roster of the Interpretation Development Team.   |   |

## **I. INTRODUCTION**

The North American Electric Reliability Corporation (“NERC”) hereby requests approval of an interpretation to a requirement of a NERC Reliability Standard:

- CIP-001-1 — Sabotage Reporting, Requirement R2

No modification to the language contained in this specific requirement is being proposed through the interpretation. The NERC Board of Trustees approved the interpretation to Reliability Standard CIP-001-1 — Sabotage Reporting, Requirement R2 on February 16, 2010. NERC requests approval of the proposed interpretation to Reliability Standard CIP-001-1, to be made effective immediately upon approval in accordance with FERC’s procedures. **Exhibit A** to this filing sets forth the proposed interpretation. **Exhibit B** contains the affected Reliability Standard that includes the appended interpretation. **Exhibit C** contains the complete development record of the proposed interpretation to CIP-001-1 — Sabotage Reporting, Requirement R2. **Exhibit D** contains a roster of the interpretation development team.

NERC filed this interpretation with the Federal Energy Regulatory Commission (“FERC”) on April 21, 2010, and is also filing this interpretation with the other applicable governmental authorities in Canada.

## **II. NOTICES AND COMMUNICATIONS**

Notices and communications with respect to this filing may be addressed to the following:

Gerald W. Cauley  
President and Chief Executive Officer  
David N. Cook  
Vice President and General Counsel  
North American Electric Reliability Corporation  
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[holly.hawkins@nerc.net](mailto:holly.hawkins@nerc.net)

## **III. BACKGROUND**

### **a. Basis for Approval of Proposed Interpretation**

While this interpretation does not represent a new or modified Reliability Standard requirement, it does provide instruction with regard to the intent and, in some cases, application of the requirement that will guide compliance to it. In this regard, NERC requests approval of this interpretation.

### **b. Reliability Standards Development Procedure and Interpretation**

All persons who are directly or materially affected by the reliability of the North American bulk power system are permitted to request an interpretation of a Reliability Standard, as discussed in NERC's *Reliability Standards Development Procedure*, which is incorporated into the Rules of Procedure as Appendix 3A. Upon request, NERC will assemble a team with the relevant expertise to address the interpretation request and, within 45 days, present the interpretation response for industry ballot. If approved by the

ballot pool and the NERC Board of Trustees, the interpretation is appended to the Reliability Standard and filed for approval by FERC and applicable governmental authorities in Canada to be made effective when approved. When the affected Reliability Standard is next substantively revised using the Reliability Standards Development Process, the interpretation will be incorporated into the Reliability Standard.

The interpretation set out in **Exhibit A** has been developed and approved by industry stakeholders using NERC's *Reliability Standards Development Procedure*.<sup>1</sup> It was approved by the NERC Board of Trustees on February 16, 2010.

#### **IV. Reliability Standard CIP-001-1 — Sabotage Reporting, Requirement R2**

NERC submitted CIP-001-1 on December 5, 2006. In Section IV (a), below, NERC discusses the proposed interpretation to the standard, included in this filing as **Exhibit A**, and explains the need for the development of an interpretation to Requirement R2 in Reliability Standard CIP-001-1 — Sabotage Reporting. In this discussion, NERC demonstrates that the interpretation is consistent with the stated reliability goals of the standard. Section IV (b) below, describes the stakeholder ballot results and an explanation of how stakeholder comments were considered and addressed by the team assembled to develop the interpretation.

The complete development record for the interpretation, set forth in **Exhibit C**, includes the request for the interpretation, the response to the request for the interpretation, the ballot pool and the final ballot results by registered ballot body members, stakeholder comments received during the balloting and an explanation of how

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<sup>1</sup> See NERC's *Reliability Standards Development Procedure Version 7*, approved by the NERC Board of Trustees on November 5, 2009, available at [http://www.nerc.com/files/Appendix\\_3A\\_ReliabilityStandardsDevelopmentProcedure\\_02052010.pdf](http://www.nerc.com/files/Appendix_3A_ReliabilityStandardsDevelopmentProcedure_02052010.pdf).

those comments were considered. **Exhibit D** contains a roster of the team members who worked on the interpretation.

**a. Justification for Approval of Interpretation**

On January 26, 2009, Covanta Energy submitted a request for formal interpretation of CIP-001-1 — Sabotage Reporting, Requirement R2. The purpose of CIP-001-1 is that “[d]isturbances or unusual occurrences, suspected or determined to be caused by sabotage, shall be reported to the appropriate systems, governmental agencies, and regulatory bodies.” Requirement R2 specifically states:

**R2.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.

Covanta Energy requested clarification on what is meant by the term “appropriate parties.” Additionally, Covanta asked “who within the Interconnection hierarchy deems parties to be appropriate?”

Members of the Cyber Security Order No. 706 Standard Authorization Request (“SAR”) Standard Drafting Team provided the following response to the interpretation request:

*The drafting team interprets the phrase “appropriate parties in the Interconnection” to refer collectively to entities with whom the reporting party has responsibilities and/or obligations for the communication of physical or cyber security event information. For example, reporting responsibilities result from NERC standards IRO-001 Reliability Coordination — Responsibilities and Authorities, COM-002-2 Communication and Coordination, and TOP-001 Reliability Responsibilities and Authorities, among others. Obligations to report could also result from agreements, processes, or procedures with other parties, such as may be found in operating agreements and interconnection agreements.*



*The drafting team asserts that those entities to which communicating sabotage events is appropriate would be identified by the reporting entity and documented within the procedure required in CIP-001-1 Requirement R2.*

*Regarding “who within the Interconnection hierarchy deems parties to be appropriate,” the drafting team knows of no interconnection authority that has such a role.*

The interpretation clarifies that the responsible entity identifies the appropriate parties to whom sabotage events will be reported in its procedure addressing Requirement R2. This approach is consistent with the objective of the requirement and that of the standard to report sabotage events to “appropriate systems, governmental agencies, and regulatory bodies.”

#### **b. Summary of the Reliability Standard Development Proceedings**

NERC presented the interpretation response for pre-ballot review on July 6, 2009. The initial ballot was conducted from August 6, 2009 through August 17, 2009 and achieved a quorum of 84.68 percent with a weighted affirmative approval of 68.92 percent. There were 58 negative ballots submitted for the initial ballot, and 42 of those ballots included a comment, which initiated the need for a recirculation ballot. The recirculation ballot was conducted from September 29, 2009 through October 9, 2009 and achieved a quorum of 89.92 percent with a weighted affirmative approval of 68.31 percent. There were 62 negative ballots submitted for the recirculation ballot, and 43 of those ballots included a comment. Some balloters listed more than one reason for their negative ballot. Overall the comments pertained to two main themes: (1) remove references to other standards in the interpretation; and (2) be more prescriptive as to who must be notified of sabotage events.

More specifically, the reasons cited for the negative ballots included the following:

- Twenty three ballots indicated concerns regarding the notification of parties for sabotage events:
  - Ten ballots indicated that the reference to obligations arising from "agreements, processes and procedures" may fail to include parties that perform reliability functions. Alternately, eight ballots indicated that the contractual or other obligations may not pertain to grid reliability and may therefore be overly inclusive. Six others indicated these references are too broad and still undefined.
  - Nine ballots indicated either Requirement R2 does not necessitate specific "appropriate entities" to be identified in the procedures or that it should be left to the responsible entity to define the appropriate parties. Most of those ballots stated the list should be determined by the incident and potential impact.
  - Four ballots indicated the interpretation still leaves open to debate between auditors and responsible entities the issue of whether the responsible entity identified appropriate interconnection parties.
  - Two ballots indicated the third paragraph conflicts with the second. The third paragraph states the drafting team knows of no Interconnection authority that deems the parties that are appropriate, but the second says the registered entity must identify the appropriate parties, meaning the registered entity has the authority.
  - Two ballots indicated phrases such as "appropriate parties" are ambiguous and would interfere with an auditor's objective audit and could require an auditor (and a registered entity's contracts department) to review every entity contract. This could potentially increase the need for resources for Regional Entities and registered entities with little or no benefit to the reliability of the bulk power system.
  - Two ballots indicated the list of entities should not be required as auditable evidence in a compliance audit.
  - Two ballots indicated Requirement R2 of CIP-001-1 is limited to requiring that the Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator and Load-Serving Entity have procedures in place for the communication of information concerning sabotage events.
  - Two ballots indicated the notification should be made to the appropriate Reliability Coordinator; one suggested the Reliability Coordinator could cascade the message to other Reliability Coordinators in North America.

- One balloter indicated the interpretation should simply state that the drafting team asserts that those entities to which communicating sabotage events is appropriate would be identified by the reporting entity and documented within the procedure required in CIP-001-1.
- One balloter indicated the interpretation is not specific enough in its definition of “appropriate parties.”
- One balloter indicated the background agreements from which the entities created their lists will not be reviewed during a compliance audit, which will result in an audit simply confirming that the entity has a list for a requirement (R2) that requires an entity have a procedure.
- One balloter indicated the first part of the interpretation is vague as it implies that the list of these entities should result from requirements of the other standards.
- One balloter indicated the interpretation needs to be more specific regarding the parties to be communicated with since significant doubt would remain as to whether or not the required communication processes have been established with all necessary parties; the balloter recommended Requirement R2 be revised to explicitly identify parties when CIP-001 is due for its next revision.
- One balloter indicated “appropriate entities” should be those organizations that need to know given the event and the circumstances. Within an Interconnection, the entities that should be made aware of the event are the registered entity's Reliability Coordinator and/or Transmission Service Provider(s).
- One balloter indicated the response references reporting to entities requiring physical or cyber security event information, but this standard is focused on sabotage.
- Twelve balloters indicated concerns with the references to other standards:
  - Six balloters indicated the references to IRO-001-1, COM-002-2, and TOP-001-1 only add confusion and believe the interpretation process should just answer the question asked and not elaborate with further discussion.
  - Five balloters indicated IRO-001-1 and TOP-001-1 have nothing to do with sabotage reporting, with four of those balloters claiming that citing those standards in this way is an indirect interpretation of those two standards and therefore falls outside the ANSI-accredited process. Those four balloters indicated COM-002-2 is only marginally relevant.
  - One balloter indicated that using COM-002-2 as an example does not provide clarity because COM-002-2 also uses "appropriate" to describe the entities to which communication should be provided.
  - One balloter indicated the example standards do not address the CIP-001-1 criteria, leaving the entity to make a professional judgment as to whom

reports should or should not be made. The balloter indicated the reporting process should be clearly defined by the drafting team.

- Eight balloters indicated general clarification is needed, saying either the interpretation is too vague or does not help with compliance for vague requirements.
- Two balloters indicated the phrase “...those entities to which communicating sabotage events is appropriate would be identified by the reporting entity and documented within the procedure required in CIP-001-1 Requirement R2” seems to mean that as long as the reporting entity does what its procedure states then it is in compliance. The balloters claim the purpose of the standard should not only ensure that reporting entities do what they state they will do but that they will perform in accordance with the requirement to maintain an acceptable level of reliability.

The standard drafting team responded that the references to other Reliability Standards were provided only as examples for information purposes. Further, the drafting team responded to the suggestions for more prescription, opining that doing so would create more, not less, confusion. Based on its conclusion that the specification of who ought to receive reports of sabotage events may not be applicable in all cases at all times, the drafting team maintained that the responsible entity shall make the determination as required in the standard. The team did not revise the proposed interpretation in response to the comments.

## V. CONCLUSION

NERC respectfully requests approval of the interpretation to the Requirement R2 in Reliability Standard CIP-001-1 — Sabotage Reporting, as set out in **Exhibit A**. NERC requests that this interpretation be made effective immediately upon approval.

Respectfully submitted,

Gerald W. Cauley  
President and Chief Executive Officer  
David N. Cook  
Vice President and General Counsel  
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/s/ Holly A. Hawkins  
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**Exhibit A**

**Interpretation of Standard CIP-001-1 — Sabotage Reporting, Requirement R2,  
Proposed for Approval**

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

| Request for an Interpretation of a Reliability Standard  |                            |
|--|----------------------------|
| <b>Date submitted:</b>   | 01/26/2009                 |
| <b>Contact information for person requesting the interpretation:</b>   |                            |
| <b>Name:</b>   | Samuel Cabassa             |
| <b>Organization:</b>   | Covanta Energy             |
| <b>Telephone:</b>  | 973-882-7284               |
| <b>E-mail:</b>   | scabassa@covantaenergy.com |
| <b>Identify the standard that needs clarification:</b>   |                            |
| <b>Standard Number:</b>  | CIP-001-1                  |
| <b>Standard Title:</b>   | Sabotage Reporting         |
| <b>Identify specifically what needs clarification</b> (If a category is not applicable, please leave it blank):  |                            |
| <b>Requirement Number and Text of Requirement:</b>   |                            |
| <p><b>R2.</b> Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.</p> |                            |
| <b>Clarification needed:</b>   |                            |
| <p>Please clarify what is meant by the term, "appropriate parties." Moreover, who within the Interconnection hierarchy deems parties to be appropriate?</p>  |                            |
| <b>Identify the material impact associated with this interpretation:</b>   |                            |
| <b>Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.</b>  |                            |
| <p>Failure to list and notify appropriate parties could potentially affect other entities within the Interconnection and expose our facilities to potential penalties.</p>   |                            |

**Exhibit B**

**Reliability Standard CIP-001-1a — Sabotage Reporting, Requirement R2 that  
includes the Appended Interpretation  
(Clean and Redline)**



**A. Introduction**

- 1. Title:** **Sabotage Reporting**
- 2. Number:** CIP-001-1a
- 3. Purpose:** Disturbances or unusual occurrences, suspected or determined to be caused by sabotage, shall be reported to the appropriate systems, governmental agencies, and regulatory bodies.
- 4. Applicability**
  - 4.1.** Reliability Coordinators.
  - 4.2.** Balancing Authorities.
  - 4.3.** Transmission Operators.
  - 4.4.** Generator Operators.
  - 4.5.** Load Serving Entities.
- 5. Effective Date:** Immediately after approval of applicable regulatory authorities.

**B. Requirements**

- R1.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi-site sabotage affecting larger portions of the Interconnection.
- R2.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.
- R3.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall provide its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events.
- R4.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials and develop reporting procedures as appropriate to their circumstances.

**C. Measures**

- M1.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have and provide upon request a procedure (either electronic or hard copy) as defined in Requirement 1
- M2.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have and provide upon request the procedures or guidelines that will be used to confirm that it meets Requirements 2 and 3.
- M3.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have and provide upon request evidence that could include, but is not limited to procedures, policies, a letter of understanding, communication records, or other equivalent evidence that will be used to confirm that it has established communications contacts with the applicable, local FBI or RCMP officials to communicate sabotage events (Requirement 4).

## D. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Monitoring Responsibility

Regional Reliability Organizations shall be responsible for compliance monitoring.

#### 1.2. Compliance Monitoring and Reset Time Frame

One or more of the following methods will be used to verify compliance:

- Self-certification (Conducted annually with submission according to schedule.)
- Spot Check Audits (Conducted anytime with up to 30 days notice given to prepare.)
- Periodic Audit (Conducted once every three years according to schedule.)
- Triggered Investigations (Notification of an investigation must be made within 60 days of an event or complaint of noncompliance. The entity will have up to 30 days to prepare for the investigation. An entity may request an extension of the preparation period and the extension will be considered by the Compliance Monitor on a case-by-case basis.)

The Performance-Reset Period shall be 12 months from the last finding of non-compliance.

#### 1.3. Data Retention

Each Reliability Coordinator, Transmission Operator, Generator Operator, Distribution Provider, and Load Serving Entity shall have current, in-force documents available as evidence of compliance as specified in each of the Measures.

If an entity is found non-compliant the entity shall keep information related to the non-compliance until found compliant or for two years plus the current year, whichever is longer.

Evidence used as part of a triggered investigation shall be retained by the entity being investigated for one year from the date that the investigation is closed, as determined by the Compliance Monitor,

The Compliance Monitor shall keep the last periodic audit report and all requested and submitted subsequent compliance records.

#### 1.4. Additional Compliance Information

None.

### 2. Levels of Non-Compliance:

**2.1. Level 1:** There shall be a separate Level 1 non-compliance, for every one of the following requirements that is in violation:

**2.1.1** Does not have procedures for the recognition of and for making its operating personnel aware of sabotage events (R1).

**2.1.2** Does not have procedures or guidelines for the communication of information concerning sabotage events to appropriate parties in the Interconnection (R2).

**2.1.3** Has not established communications contacts, as specified in R4.

**2.2. Level 2:** Not applicable.

**2.3. Level 3:** Has not provided its operating personnel with sabotage response procedures or guidelines (R3).

**2.4. Level 4:** Not applicable.

**E. Regional Differences**

None.

**Version History**

| <b>Version</b> | <b>Date</b>       | <b>Action</b>  | <b>Change Tracking</b> |
|----------------|-------------------|--|------------------------|
| 0              | April 1, 2005     | Effective Date   | New                    |
| 0              | August 8, 2005    | Removed “Proposed” from Effective Date   | Errata                 |
| 1              | November 1, 2006  | Adopted by Board of Trustees   | Amended                |
| 1              | April 4, 2007     | Regulatory Approval — Effective Date   | New                    |
| 1a             | February 16, 2010 | Added Appendix 1 — Interpretation of R2 approved by the NERC Board of Trustees | Addition               |

Appendix 1

| <b>Requirement Number and Text of Requirement</b>   |
|---|
| <p><b>CIP-001-1:</b></p> <p><b>R2.</b> Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.</p>   |
| <b>Question</b>   |
| <p>Please clarify what is meant by the term, “appropriate parties.” Moreover, who within the Interconnection hierarchy deems parties to be appropriate?</p>   |
| <b>Response</b>   |
| <p>The drafting team interprets the phrase “appropriate parties in the Interconnection” to refer collectively to entities with whom the reporting party has responsibilities and/or obligations for the communication of physical or cyber security event information. For example, reporting responsibilities result from NERC standards IRO-001 Reliability Coordination — Responsibilities and Authorities, COM-002-2 Communication and Coordination, and TOP-001 Reliability Responsibilities and Authorities, among others. Obligations to report could also result from agreements, processes, or procedures with other parties, such as may be found in operating agreements and interconnection agreements.</p> <p>The drafting team asserts that those entities to which communicating sabotage events is appropriate would be identified by the reporting entity and documented within the procedure required in CIP-001-1 Requirement R2.</p> <p>Regarding “who within the Interconnection hierarchy deems parties to be appropriate,” the drafting team knows of no interconnection authority that has such a role.</p> |

#### A. Introduction

1. **Title:** **Sabotage Reporting**
2. **Number:** CIP-001-1a
3. **Purpose:** Disturbances or unusual occurrences, suspected or determined to be caused by sabotage, shall be reported to the appropriate systems, governmental agencies, and regulatory bodies.
4. **Applicability**
  - 4.1. Reliability Coordinators.
  - 4.2. Balancing Authorities.
  - 4.3. Transmission Operators.
  - 4.4. Generator Operators.
  - 4.5. Load Serving Entities.
5. **Effective Date:** ~~June 4, 2007~~—Immediately after approval of applicable regulatory authorities.

#### B. Requirements

- R1. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi-site sabotage affecting larger portions of the Interconnection.
- R2. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.
- R3. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall provide its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events.
- R4. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials and develop reporting procedures as appropriate to their circumstances.

#### C. Measures

- M1. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have and provide upon request a procedure (either electronic or hard copy) as defined in Requirement 1
- M2. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have and provide upon request the procedures or guidelines that will be used to confirm that it meets Requirements 2 and 3.
- M3. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have and provide upon request evidence that could include, but is not limited to procedures, policies, a letter of understanding, communication records, or other equivalent evidence that will be used to confirm that it has established communications contacts with the applicable, local FBI or RCMP officials to communicate sabotage events (Requirement 4).

**D. Compliance**

**1. Compliance Monitoring Process**

**1.1. Compliance Monitoring Responsibility**

Regional Reliability Organizations shall be responsible for compliance monitoring.

**1.2. Compliance Monitoring and Reset Time Frame**

One or more of the following methods will be used to verify compliance:

- Self-certification (Conducted annually with submission according to schedule.)
- Spot Check Audits (Conducted anytime with up to 30 days notice given to prepare.)
- Periodic Audit (Conducted once every three years according to schedule.)
- Triggered Investigations (Notification of an investigation must be made within 60 days of an event or complaint of noncompliance. The entity will have up to 30 days to prepare for the investigation. An entity may request an extension of the preparation period and the extension will be considered by the Compliance Monitor on a case-by-case basis.)

The Performance-Reset Period shall be 12 months from the last finding of non-compliance.

**1.3. Data Retention**

Each Reliability Coordinator, Transmission Operator, Generator Operator, Distribution Provider, and Load Serving Entity shall have current, in-force documents available as evidence of compliance as specified in each of the Measures.

If an entity is found non-compliant the entity shall keep information related to the non-compliance until found compliant or for two years plus the current year, whichever is longer.

Evidence used as part of a triggered investigation shall be retained by the entity being investigated for one year from the date that the investigation is closed, as determined by the Compliance Monitor,

The Compliance Monitor shall keep the last periodic audit report and all requested and submitted subsequent compliance records.

**1.4. Additional Compliance Information**

None.

**2. Levels of Non-Compliance:**

**2.1. Level 1:** There shall be a separate Level 1 non-compliance, for every one of the following requirements that is in violation:

- 2.1.1** Does not have procedures for the recognition of and for making its operating personnel aware of sabotage events (R1).
- 2.1.2** Does not have procedures or guidelines for the communication of information concerning sabotage events to appropriate parties in the Interconnection (R2).
- 2.1.3** Has not established communications contacts, as specified in R4.

**2.2. Level 2:** Not applicable.

**2.3. Level 3:** Has not provided its operating personnel with sabotage response procedures or guidelines (R3).

**2.4. Level 4:** Not applicable.

**E. Regional Differences**

None.

**Version History**

| Version   | Date                     | Action  | Change Tracking |
|-----------|--------------------------|---|-----------------|
| 0         | April 1, 2005            | Effective Date  | New             |
| 0         | August 8, 2005           | Removed “Proposed” from Effective Date  | Errata          |
| 1         | November 1, 2006         | Adopted by Board of Trustees  | Amended         |
| 1         | April 4, 2007            | Regulatory Approval — Effective Date  | New             |
| <u>1a</u> | <u>February 16, 2010</u> | <u>Added Appendix 1 — Interpretation of R2 approved by the NERC Board of Trustees</u> | <u>Addition</u> |

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Appendix 1

Requirement Number and Text of Requirement

CIP-001-1:

R2. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.

Question

Please clarify what is meant by the term, “appropriate parties.” Moreover, who within the Interconnection hierarchy deems parties to be appropriate?

Response

The drafting team interprets the phrase “appropriate parties in the Interconnection” to refer collectively to entities with whom the reporting party has responsibilities and/or obligations for the communication of physical or cyber security event information. For example, reporting responsibilities result from NERC standards IRO-001 Reliability Coordination — Responsibilities and Authorities, COM-002-2 Communication and Coordination, and TOP-001 Reliability Responsibilities and Authorities, among others. Obligations to report could also result from agreements, processes, or procedures with other parties, such as may be found in operating agreements and interconnection agreements.

The drafting team asserts that those entities to which communicating sabotage events is appropriate would be identified by the reporting entity and documented within the procedure required in CIP-001-1 Requirement R2.

Regarding “who within the Interconnection hierarchy deems parties to be appropriate,” the drafting team knows of no interconnection authority that has such a role.



**Exhibit C**

**Complete Record of Development of the Interpretation for Reliability Standard  
CIP-001-1a — Sabotage Reporting, Requirement R2**

**Project 2009-09**  
**Interpretation of CIP-001-1 – Cyber Security – Sabotage Reporting for Covanta Energy**

**Status:**

The interpretation was approved by the NERC Board of Trustees on February 16, 2010.

**Summary:**

Covanta Energy requested clarification regarding what is meant by the term "appropriate parties" and asked if there is an entity within the interconnection hierarchy that deems parties to be appropriate.

**Interpretation Process:**

In accordance with the Reliability Standards Development Procedure, the interpretation must be posted for a 30-day pre-ballot review, and then balloted. There is no public comment period for an interpretation. Balloting will be conducted following the same method used for balloting standards. If the interpretation is approved by its ballot pool, then the interpretation will be appended to the standard and will become effective when adopted by the NERC Board of Trustees and approved by the applicable regulatory authorities. The interpretation will remain appended to the standard until the standard is revised through the normal standards development process. When the standard is revised, the clarifications provided by the interpretation will be incorporated into the revised standard.

| Draft  | Action  | Dates                           | Results   | Consideration of Comments                             |
|--|---|---------------------------------|---|---|
| Interpretation of CIP-001-1 – Cyber Security – Sabotage Reporting for Covanta Energy<br><br><a href="#">Interpretation (2)</a><br><br><a href="#">Request for Interpretation (1)</a> | Recirculation Ballot<br><a href="#">Info&gt;&gt; (8)</a>   <a href="#">Vote&gt;&gt;</a> | 09/29/09 - 10/09/09<br>(closed) | <a href="#">Summary&gt;&gt; (9)</a><br><a href="#">Full Record&gt;&gt; (10)</a> |   |
|  | Initial Ballot<br><a href="#">Info&gt;&gt; (4)</a>   <a href="#">Vote&gt;&gt;</a>       | 08/06/09 - 08/17/09<br>(closed) | <a href="#">Summary&gt;&gt; (5)</a><br><a href="#">Full Record&gt;&gt; (6)</a>  | <a href="#">Consideration of Comments&gt;&gt; (7)</a> |
|  | Pre-ballot Review<br><a href="#">Info&gt;&gt; (3)</a>   <a href="#">Join&gt;&gt;</a>    | 07/06/09 - 08/06/09<br>(closed) |   |   |

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

| Request for an Interpretation of a Reliability Standard  |                            |
|--|----------------------------|
| <b>Date submitted:</b>   | 01/26/2009                 |
| <b>Contact information for person requesting the interpretation:</b>   |                            |
| <b>Name:</b>   | Samuel Cabassa             |
| <b>Organization:</b>   | Covanta Energy             |
| <b>Telephone:</b>  | 973-882-7284               |
| <b>E-mail:</b>   | scabassa@covantaenergy.com |
| <b>Identify the standard that needs clarification:</b>   |                            |
| <b>Standard Number:</b>  | CIP-001-1                  |
| <b>Standard Title:</b>   | Sabotage Reporting         |
| <b>Identify specifically what needs clarification (If a category is not applicable, please leave it blank):</b>  |                            |
| <b>Requirement Number and Text of Requirement:</b>   |                            |
| <p><b>R2.</b> Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.</p> |                            |
| <b>Clarification needed:</b>   |                            |
| <p>Please clarify what is meant by the term, "appropriate parties." Moreover, who within the Interconnection hierarchy deems parties to be appropriate?</p>  |                            |
| <b>Identify the material impact associated with this interpretation:</b>   |                            |
| <b>Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.</b>  |                            |
| <p>Failure to list and notify appropriate parties could potentially affect other entities within the Interconnection and expose our facilities to potential penalties.</p>   |                            |

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

| Request for an Interpretation of a Reliability Standard  |  |
|--|--|
| <b>Date submitted:</b> <a href="#">January 26, 2009</a>  |  |
| <b>Contact information for person requesting the interpretation:</b>   |  |
| <b>Name:</b>   | <a href="#">Samuel Cabassa</a>   |
| <b>Organization:</b>   | <a href="#">Covanta Energy</a>   |
| <b>Telephone:</b>  | <a href="#">973-882-7284</a>   |
| <b>E-mail:</b>   | <a href="mailto:scabassa@covantaenergy.com">scabassa@covantaenergy.com</a> |
| <b>Identify the standard that needs clarification:</b>   |  |
| <b>Standard Number:</b>  | <a href="#">CIP-001-1</a>  |
| <b>Standard Title:</b>   | <a href="#">Sabotage Reporting</a>   |
| <b>Identify specifically what needs clarification</b> (If a category is not applicable, please leave it blank):  |  |
| <b>Requirement Number and Text of Requirement:</b>   |  |
| <a href="#">R2. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.</a> |  |
| <b>Clarification needed:</b>   |  |
| <a href="#">Please clarify what is meant by the term, "appropriate parties." Moreover, who within the Interconnection hierarchy deems parties to be appropriate?</a>   |  |
| <b>Identify the material impact associated with this interpretation:</b>   |  |
| <b>Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.</b>  |  |
| <a href="#">Failure to list and notify appropriate parties could potentially affect other entities within the Interconnection and expose our facilities to potential penalties.</a>  |  |

**Project 2009-09: Response to Request for an Interpretation of CIP-001-1 Requirement R2 for Covanta Energy.**

The following interpretation of CIP-001-1 — Sabotage Reporting Requirement R2 was developed by the Cyber Security Order 706 SAR drafting team.

**Requirement Number and Text of Requirement**

**CIP-001-1:**

**R2.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.

**Question**

Please clarify what is meant by the term, “appropriate parties.” Moreover, who within the Interconnection hierarchy deems parties to be appropriate?

**Response**

The drafting team interprets the phrase “appropriate parties in the Interconnection” to refer collectively to entities with whom the reporting party has responsibilities and/or obligations for the communication of physical or cyber security event information. For example, reporting responsibilities result from NERC standards IRO-001 Reliability Coordination — Responsibilities and Authorities, COM-002-2 Communication and Coordination, and TOP-001 Reliability Responsibilities and Authorities, among others. Obligations to report could also result from agreements, processes, or procedures with other parties, such as may be found in operating agreements and interconnection agreements.

The drafting team asserts that those entities to which communicating sabotage events is appropriate would be identified by the reporting entity and documented within the procedure required in CIP-001-1 Requirement R2.

Regarding “who within the Interconnection hierarchy deems parties to be appropriate,” the drafting team knows of no interconnection authority that has such a role.



NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Standards Announcement

### Ballot Pool and Pre-ballot Window

July 6–August 6, 2009

Now available at: <https://standards.nerc.net/BallotPool.aspx>

#### **Interpretation of CIP-001-1 for Covanta Energy (Project 2009-09)**

An interpretation of standard CIP-001-1 — Sabotage Reporting Requirement R2 for Covanta Energy is posted for a 30-day pre-ballot review. Registered Ballot Body members may join the ballot pool to be eligible to vote on this interpretation **until 8 a.m. EDT on August 6, 2009**.

During the pre-ballot window, members of the ballot pool may communicate with one another by using their “ballot pool list server.” (Once the balloting begins, ballot pool members are prohibited from using the ballot pool list servers.) The list server for this ballot pool is: [bp-2009-09\\_RFI\\_Covanta\\_in](#).

#### **Next Steps**

Voting will begin shortly after the pre-ballot review closes.

#### **Project Background**

Covanta Energy requested an interpretation of the term “appropriate parties” and asked if there is an entity within the interconnection hierarchy that deems parties to be appropriate.

The request and interpretation can be found on the project page:

[http://www.nerc.com/filez/standards/Project2009-09\\_Interpretation\\_CIP-001-1\\_Covanta.html](http://www.nerc.com/filez/standards/Project2009-09_Interpretation_CIP-001-1_Covanta.html)

#### **Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate

*For more information or assistance,  
please contact Shaun Streeter at [shaun.streeter@nerc.net](mailto:shaun.streeter@nerc.net) or at 609.452.8060.*



NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Standards Announcement Initial Ballot Window Open August 6–17, 2009

Now available at: <https://standards.nerc.net/CurrentBallots.aspx>

### **Project 2009-09: Interpretation of CIP-001-1 for Covanta Energy**

An initial ballot window for an interpretation of standard CIP-001-1 — Sabotage Reporting Requirement R2 for Covanta Energy is now open **until 8 p.m. EDT on August 17, 2009**.

#### **Instructions:**

Members of the ballot pool associated with this project may log in and submit their votes from the following page: <https://standards.nerc.net/CurrentBallots.aspx>

#### **Next Steps:**

Voting results will be posted and announced after the ballot window closes.

#### **Project Background:**

Covanta Energy requested an interpretation of the term “appropriate parties” and asked if there is an entity within the interconnection hierarchy that deems parties to be appropriate.

The request and interpretation are posted on the project page:

[http://www.nerc.com/filez/standards/Project2009-09\\_ Interpretation\\_CIP-001-1\\_Covanta.html](http://www.nerc.com/filez/standards/Project2009-09_ Interpretation_CIP-001-1_Covanta.html)

#### **Standards Development Process**

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*For more information or assistance,  
please contact Shaun Streeter at [shaun.streeter@nerc.net](mailto:shaun.streeter@nerc.net) or at 609.452.8060.*



NORTH AMERICAN ELECTRIC  
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## Standards Announcement Initial Ballot Results

Now available at: <https://standards.nerc.net/Ballots.aspx>

### **Project 2009-09: Interpretation of CIP-001-1 for Covanta Energy**

The initial ballot for an interpretation of standard CIP-001-1 — Sabotage Reporting Requirement R2 for Covanta Energy ended on August 17, 2009.

### **Ballot Results**

Voting statistics are listed below, and the [Ballot Results](#) Web page provides a link to the detailed results:

Quorum: 84.68%

Approval: 68.92%

Since at least one negative ballot included a comment, these results are not final. A second (or recirculation) ballot must be conducted. Ballot criteria details are listed at the end of the announcement.

### **Next Steps**

As part of the recirculation ballot process, the drafting team must draft and post responses to voter comments. The drafting team will also determine whether or not to make revisions to the balloted item(s). Should the team decide to make revisions, the revised item(s) will return to the initial ballot phase.

### **Project Background**

Covanta Energy requested an interpretation of the term “appropriate parties” and asked if there is an entity within the interconnection hierarchy that deems parties to be appropriate.

The request and interpretation are posted on the project page:

[http://www.nerc.com/filez/standards/Project2009-09 Interpretation CIP-001-1 Covanta.html](http://www.nerc.com/filez/standards/Project2009-09%20Interpretation%20CIP-001-1%20Covanta.html)

### **Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

### **Ballot Criteria**

Approval requires both a (1) quorum, which is established by at least 75% of the members of the ballot pool for submitting either an affirmative vote, a negative vote, or an abstention, and (2) A two-thirds majority of the weighted segment votes cast must be affirmative; the number of votes cast is the sum of affirmative and negative votes, excluding abstentions and nonresponses. If there are no negative votes with reasons from the first ballot, the results of the first ballot shall stand. If, however, one or more members submit negative votes with reasons, a second ballot shall be conducted.

*For more information or assistance,  
please contact Shaun Streeter at [shaun.streeter@nerc.net](mailto:shaun.streeter@nerc.net) or at 609.452.8060.*



User Name

Password

Log in

Register

- Ballot Pools
- Current Ballots
- Ballot Results
- Registered Ballot Body
- Proxy Voters

[Home Page](#)

| Ballot Results                |  |
|-------------------------------|--|
| <b>Ballot Name:</b>           | Project 2009-09 - Interpretation - Covanta Energy - CIP-001-1_in |
| <b>Ballot Period:</b>         | 8/6/2009 - 8/17/2009   |
| <b>Ballot Type:</b>           | Initial  |
| <b>Total # Votes:</b>         | 210  |
| <b>Total Ballot Pool:</b>     | 248  |
| <b>Quorum:</b>                | <b>84.68 % The Quorum has been reached</b>                       |
| <b>Weighted Segment Vote:</b> | 68.92 %  |
| <b>Ballot Results:</b>        | <b>The standard will proceed to recirculation ballot.</b>        |

| Summary of Ballot Results |             |                |             |              |           |              |                 |           |
|---------------------------|-------------|----------------|-------------|--------------|-----------|--------------|-----------------|-----------|
| Segment                   | Ballot Pool | Segment Weight | Affirmative |              | Negative  |              | Abstain # Votes | No Vote   |
|                           |             |                | # Votes     | Fraction     | # Votes   | Fraction     |                 |           |
| 1 - Segment 1.            | 67          | 1              | 35          | 0.7          | 15        | 0.3          | 5               | 12        |
| 2 - Segment 2.            | 11          | 0.8            | 4           | 0.4          | 4         | 0.4          | 0               | 3         |
| 3 - Segment 3.            | 51          | 1              | 34          | 0.773        | 10        | 0.227        | 1               | 6         |
| 4 - Segment 4.            | 14          | 1              | 9           | 0.818        | 2         | 0.182        | 2               | 1         |
| 5 - Segment 5.            | 52          | 1              | 32          | 0.711        | 13        | 0.289        | 2               | 5         |
| 6 - Segment 6.            | 30          | 1              | 16          | 0.667        | 8         | 0.333        | 0               | 6         |
| 7 - Segment 7.            | 0           | 0              | 0           | 0            | 0         | 0            | 0               | 0         |
| 8 - Segment 8.            | 9           | 0.9            | 6           | 0.6          | 3         | 0.3          | 0               | 0         |
| 9 - Segment 9.            | 5           | 0.2            | 2           | 0.2          | 0         | 0            | 1               | 2         |
| 10 - Segment 10.          | 9           | 0.6            | 3           | 0.3          | 3         | 0.3          | 0               | 3         |
| <b>Totals</b>             | <b>248</b>  | <b>7.5</b>     | <b>141</b>  | <b>5.169</b> | <b>58</b> | <b>2.331</b> | <b>11</b>       | <b>38</b> |

| Individual Ballot Pool Results |   |                   |             |                      |
|--------------------------------|---|-------------------|-------------|----------------------|
| Segment                        | Organization                            | Member            | Ballot      | Comments             |
| 1                              | Ameren Services                         | Kirit S. Shah     | Negative    | <a href="#">View</a> |
| 1                              | American Electric Power                 | Paul B. Johnson   | Affirmative |                      |
| 1                              | American Transmission Company, LLC      | Jason Shaver      | Affirmative |                      |
| 1                              | Associated Electric Cooperative, Inc.   | John Bussman      |             |                      |
| 1                              | Avista Corp.                            | Scott Kinney      | Abstain     |                      |
| 1                              | BC Transmission Corporation             | Gordon Rawlings   | Affirmative |                      |
| 1                              | Bonneville Power Administration         | Donald S. Watkins | Affirmative |                      |
| 1                              | Brazos Electric Power Cooperative, Inc. | Tony Kroskey      | Affirmative |                      |

|   |  |                              |             |                      |
|---|--|------------------------------|-------------|----------------------|
| 1 | CenterPoint Energy   | Paul Rocha                   | Affirmative |                      |
| 1 | Central Maine Power Company  | Brian Conroy                 | Negative    |                      |
| 1 | City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power | Alan L Cooke                 | Abstain     |                      |
| 1 | City Utilities of Springfield, Missouri  | Jeff Knottek                 | Affirmative |                      |
| 1 | Consolidated Edison Co. of New York  | Christopher L de Graffenried | Affirmative |                      |
| 1 | Dominion Virginia Power  | William L. Thompson          | Negative    | <a href="#">View</a> |
| 1 | Duke Energy Carolina   | Douglas E. Hils              | Affirmative |                      |
| 1 | E.ON U.S. LLC  | Larry Monday                 | Negative    | <a href="#">View</a> |
| 1 | East Kentucky Power Coop.  | George S. Carruba            |             |                      |
| 1 | Entergy Corporation  | George R. Bartlett           | Affirmative |                      |
| 1 | Exelon Energy  | John J. Blazekovich          | Negative    | <a href="#">View</a> |
| 1 | Farmington Electric Utility System   | Alan Glazner                 |             |                      |
| 1 | FirstEnergy Energy Delivery  | Robert Martinko              | Affirmative | <a href="#">View</a> |
| 1 | Florida Keys Electric Cooperative Assoc.   | Dennis Minton                |             |                      |
| 1 | Great River Energy   | Gordon Pietsch               | Affirmative |                      |
| 1 | Hoosier Energy Rural Electric Cooperative, Inc.                                  | Damon Holladay               | Affirmative |                      |
| 1 | Hydro One Networks, Inc.   | Ajay Garg                    | Negative    | <a href="#">View</a> |
| 1 | Idaho Power Company  | Ronald D. Schellberg         | Affirmative |                      |
| 1 | ITC Transmission   | Elizabeth Howell             |             |                      |
| 1 | JEA  | Ted E. Hobson                | Negative    | <a href="#">View</a> |
| 1 | Kansas City Power & Light Co.  | Michael Gammon               | Affirmative |                      |
| 1 | Kissimmee Utility Authority  | Joe B Watson                 | Affirmative |                      |
| 1 | Lakeland Electric  | Larry E Watt                 |             |                      |
| 1 | Lee County Electric Cooperative  | Rodney Hawkins               |             |                      |
| 1 | Lincoln Electric System  | Doug Bantam                  |             |                      |
| 1 | Long Island Power Authority  | Jonathan Appelbaum           | Negative    | <a href="#">View</a> |
| 1 | Manitoba Hydro   | Michelle Rheault             | Affirmative |                      |
| 1 | MEAG Power   | Danny Dees                   | Negative    |                      |
| 1 | MidAmerican Energy Co.   | Terry Harbour                | Affirmative | <a href="#">View</a> |
| 1 | New York Power Authority   | Ralph Ruffano                | Negative    |                      |
| 1 | New York State Electric & Gas Corp.  | Henry G. Masti               |             |                      |
| 1 | Northeast Utilities  | David H. Boguslawski         | Negative    | <a href="#">View</a> |
| 1 | Northern Indiana Public Service Co.  | Kevin M Largura              | Affirmative |                      |
| 1 | Ohio Valley Electric Corp.   | Robert Matthey               | Affirmative |                      |
| 1 | Oklahoma Gas and Electric Co.  | Marvin E VanBebber           | Abstain     |                      |
| 1 | Omaha Public Power District  | Lorees Tadros                |             |                      |
| 1 | Oncor Electric Delivery  | Charles W. Jenkins           | Affirmative |                      |
| 1 | Otter Tail Power Company   | Lawrence R. Larson           | Affirmative |                      |
| 1 | Pacific Gas and Electric Company   | Chifong L. Thomas            |             |                      |
| 1 | PacifiCorp   | Mark Sampson                 | Affirmative |                      |
| 1 | Platte River Power Authority   | John C. Collins              | Affirmative |                      |
| 1 | Potomac Electric Power Co.   | Richard J. Kafka             | Affirmative |                      |
| 1 | PowerSouth Energy Cooperative  | Larry D. Avery               | Negative    |                      |
| 1 | PP&L, Inc.   | Ray Mammarella               | Negative    | <a href="#">View</a> |
| 1 | Progress Energy Carolinas  | Sammy Roberts                | Affirmative | <a href="#">View</a> |
| 1 | Public Service Electric and Gas Co.  | Kenneth D. Brown             | Affirmative |                      |
| 1 | Puget Sound Energy, Inc.   | Catherine Koch               | Negative    | <a href="#">View</a> |
| 1 | Salt River Project   | Robert Kondziolka            | Affirmative |                      |
| 1 | Santee Cooper  | Terry L. Blackwell           | Affirmative |                      |
| 1 | SaskPower  | Wayne Guttormson             | Abstain     |                      |
| 1 | Seattle City Light   | Pawel Krupa                  | Affirmative |                      |
| 1 | South Texas Electric Cooperative   | Richard McLeon               | Abstain     |                      |
| 1 | Southern California Edison Co.   | Dana Cabbell                 | Affirmative |                      |
| 1 | Southern Company Services, Inc.  | Horace Stephen Williamson    | Affirmative |                      |
| 1 | Southwest Transmission Cooperative, Inc.   | James L. Jones               | Affirmative |                      |
| 1 | Tri-State G & T Association Inc.   | Keith V. Carman              |             |                      |
| 1 | Westar Energy  | Allen Klassen                | Negative    |                      |
| 1 | Western Area Power Administration  | Brandy A Dunn                | Affirmative |                      |
| 1 | Xcel Energy, Inc.  | Gregory L. Pieper            | Affirmative |                      |
| 2 | Alberta Electric System Operator   | Anita Lee                    | Negative    | <a href="#">View</a> |
| 2 | BC Transmission Corporation  | Faramarz Amjadi              | Affirmative |                      |
| 2 | California ISO   | Greg Tillitson               | Negative    | <a href="#">View</a> |
| 2 | Electric Reliability Council of Texas, Inc.                                      | Chuck B Manning              | Affirmative |                      |
| 2 | Independent Electricity System Operator  | Kim Warren                   | Negative    | <a href="#">View</a> |
| 2 | ISO New England, Inc.  | Kathleen Goodman             | Negative    | <a href="#">View</a> |

|   |   |                         |             |                      |
|---|---|-------------------------|-------------|----------------------|
| 2 | Midwest ISO, Inc.                             | Terry Bilke             |             |                      |
| 2 | New Brunswick System Operator                 | Alden Briggs            |             |                      |
| 2 | New York Independent System Operator          | Gregory Campoli         |             |                      |
| 2 | PJM Interconnection, L.L.C.                   | Tom Bowe                | Affirmative |                      |
| 2 | Southwest Power Pool                          | Charles H Yeung         | Affirmative |                      |
| 3 | Alabama Power Company                         | Bobby Kerley            | Affirmative |                      |
| 3 | Ameren Services                               | Mark Peters             | Negative    |                      |
| 3 | American Electric Power                       | Raj Rana                | Affirmative |                      |
| 3 | Arizona Public Service Co.                    | Thomas R. Glock         | Affirmative |                      |
| 3 | Atlantic City Electric Company                | James V. Petrella       | Affirmative |                      |
| 3 | BC Hydro and Power Authority                  | Pat G. Harrington       | Abstain     |                      |
| 3 | Bonneville Power Administration               | Rebecca Berdahl         |             |                      |
| 3 | Central Lincoln PUD                           | Steve Alexanderson      | Negative    | <a href="#">View</a> |
| 3 | City Public Service of San Antonio            | Edwin Les Barrow        | Negative    | <a href="#">View</a> |
| 3 | Commonwealth Edison Co.                       | Stephen Lesniak         | Affirmative |                      |
| 3 | Consolidated Edison Co. of New York           | Peter T Yost            | Affirmative |                      |
| 3 | Consumers Energy                              | David A. Lapinski       | Affirmative |                      |
| 3 | Cowlitz County PUD                            | Russell A Noble         | Affirmative |                      |
| 3 | Delmarva Power & Light Co.                    | Michael R. Mayer        | Affirmative |                      |
| 3 | Detroit Edison Company                        | Kent Kujala             | Affirmative |                      |
| 3 | Dominion Resources, Inc.                      | Jalal (John) Babik      | Negative    | <a href="#">View</a> |
| 3 | Duke Energy Carolina                          | Henry Ernst-Jr          | Affirmative |                      |
| 3 | Entergy Services, Inc.                        | Matt Wolf               |             |                      |
| 3 | FirstEnergy Solutions                         | Joanne Kathleen Borrell | Affirmative | <a href="#">View</a> |
| 3 | Florida Power Corporation                     | Lee Schuster            | Affirmative | <a href="#">View</a> |
| 3 | Georgia Power Company                         | Leslie Sibert           | Affirmative |                      |
| 3 | Georgia System Operations Corporation         | Edward W Pourciau       | Affirmative |                      |
| 3 | Grays Harbor PUD                              | Wesley W Gray           | Affirmative |                      |
| 3 | Great River Energy                            | Sam Kokkinen            | Affirmative |                      |
| 3 | Gulf Power Company                            | Gwen S Frazier          | Affirmative |                      |
| 3 | Hydro One Networks, Inc.                      | Michael D. Penstone     | Negative    | <a href="#">View</a> |
| 3 | JEA   | Garry Baker             | Negative    | <a href="#">View</a> |
| 3 | Kansas City Power & Light Co.                 | Charles Locke           | Affirmative |                      |
| 3 | Kissimmee Utility Authority                   | Gregory David Woessner  |             |                      |
| 3 | Lakeland Electric                             | Mace Hunter             | Affirmative |                      |
| 3 | Lincoln Electric System                       | Bruce Merrill           | Negative    | <a href="#">View</a> |
| 3 | Louisville Gas and Electric Co.               | Charles A. Freibert     | Negative    | <a href="#">View</a> |
| 3 | Manitoba Hydro                                | Greg C Parent           | Affirmative |                      |
| 3 | Mississippi Power                             | Don Horsley             | Affirmative |                      |
| 3 | New York Power Authority                      | Michael Lupo            | Negative    |                      |
| 3 | Niagara Mohawk (National Grid Company)        | Michael Schiavone       |             |                      |
| 3 | Northern Indiana Public Service Co.           | William SeDoris         | Negative    |                      |
| 3 | PacifiCorp                                    | John Apperson           | Affirmative |                      |
| 3 | Platte River Power Authority                  | Terry L Baker           | Affirmative |                      |
| 3 | Potomac Electric Power Co.                    | Robert Reuter           | Affirmative |                      |
| 3 | Progress Energy Carolinas                     | Sam Waters              | Affirmative | <a href="#">View</a> |
| 3 | Public Service Electric and Gas Co.           | Jeffrey Mueller         | Affirmative |                      |
| 3 | Public Utility District No. 2 of Grant County | Greg Lange              |             |                      |
| 3 | Sacramento Municipal Utility District         | Mark Alberter           | Affirmative |                      |
| 3 | Salt River Project                            | John T. Underhill       | Affirmative |                      |
| 3 | Santee Cooper                                 | Zack Dusenbury          | Affirmative |                      |
| 3 | Seattle City Light                            | Dana Wheelock           | Affirmative |                      |
| 3 | Southern California Edison Co.                | David Schiada           | Affirmative |                      |
| 3 | Tampa Electric Co.                            | Ronald L. Donahey       |             |                      |
| 3 | Wisconsin Electric Power Marketing            | James R. Keller         | Affirmative |                      |
| 3 | Xcel Energy, Inc.                             | Michael Ibold           | Affirmative |                      |
| 4 | Alliant Energy Corp. Services, Inc.           | Kenneth Goldsmith       | Affirmative | <a href="#">View</a> |
| 4 | American Municipal Power - Ohio               | Kevin L Holt            | Affirmative |                      |
| 4 | Consumers Energy                              | David Frank Ronk        | Affirmative |                      |
| 4 | Detroit Edison Company                        | Daniel Herring          | Affirmative |                      |
| 4 | Georgia System Operations Corporation         | Guy Andrews             | Abstain     |                      |
| 4 | Illinois Municipal Electric Agency            | Bob C. Thomas           | Negative    | <a href="#">View</a> |
| 4 | Madison Gas and Electric Co.                  | Joseph G. DePoorter     | Affirmative |                      |
| 4 | Northern California Power Agency              | Fred E. Young           | Affirmative |                      |
| 4 | Ohio Edison Company                           | Douglas Hohlbaugh       | Affirmative | <a href="#">View</a> |
| 4 | Old Dominion Electric Coop.                   | Mark Ringhausen         | Abstain     |                      |
| 4 | Public Utility District No. 1 of Snohomish    | John D. Martinsen       | Negative    | <a href="#">View</a> |

|   | County   |                       |             |                      |
|---|--|-----------------------|-------------|----------------------|
| 4 | Seattle City Light                                 | Hao Li                | Affirmative |                      |
| 4 | Seminole Electric Cooperative, Inc.                | Steven R. Wallace     |             |                      |
| 4 | Wisconsin Energy Corp.                             | Anthony Jankowski     | Affirmative |                      |
| 5 | AEP Service Corp.                                  | Brock Ondayko         | Affirmative |                      |
| 5 | Amerenue   | Sam Dwyer             | Negative    |                      |
| 5 | Avista Corp.                                       | Edward F. Groce       | Abstain     |                      |
| 5 | Bonneville Power Administration                    | Francis J. Halpin     | Affirmative |                      |
| 5 | Buckeye Power, Inc.                                | Kevin Koloini         |             |                      |
| 5 | Calpine Corporation                                | John Brent Hebert     | Affirmative |                      |
| 5 | City of Tallahassee                                | Alan Gale             | Affirmative |                      |
| 5 | Cogentrix Energy, Inc.                             | Tony Halcomb          | Affirmative |                      |
| 5 | Colmac Clarion/Piney Creek LP                      | Harvie D. Beavers     | Affirmative | <a href="#">View</a> |
| 5 | Constellation Power Source Generation, Inc.        | Scott A Etnoyer       | Negative    | <a href="#">View</a> |
| 5 | Consumers Energy                                   | James B Lewis         | Affirmative |                      |
| 5 | Covanta Energy                                     | Samuel Cabassa        | Negative    | <a href="#">View</a> |
| 5 | Detroit Edison Company                             | Ronald W. Bauer       | Affirmative |                      |
| 5 | Dominion Resources, Inc.                           | Mike Garton           | Negative    | <a href="#">View</a> |
| 5 | Dynegy   | Greg Mason            | Negative    |                      |
| 5 | Entergy Corporation                                | Stanley M Jaskot      |             |                      |
| 5 | Exelon Nuclear                                     | Michael Korchynsky    | Negative    |                      |
| 5 | FirstEnergy Solutions                              | Kenneth Dresner       | Affirmative | <a href="#">View</a> |
| 5 | FPL Energy   | Benjamin Church       | Affirmative |                      |
| 5 | Great River Energy                                 | Cynthia E Sulzer      | Affirmative |                      |
| 5 | JEA  | Donald Gilbert        | Negative    | <a href="#">View</a> |
| 5 | Kansas City Power & Light Co.                      | Scott Heidtbrink      | Affirmative |                      |
| 5 | Liberty Electric Power LLC                         | Daniel Duff           | Affirmative |                      |
| 5 | Lincoln Electric System                            | Dennis Florom         | Negative    | <a href="#">View</a> |
| 5 | Louisville Gas and Electric Co.                    | Charlie Martin        | Negative    | <a href="#">View</a> |
| 5 | Lower Colorado River Authority                     | Tom Foreman           | Negative    | <a href="#">View</a> |
| 5 | Luminant Generation Company LLC                    | Mike Laney            | Affirmative |                      |
| 5 | Manitoba Hydro                                     | Mark Aikens           | Affirmative |                      |
| 5 | MidAmerican Energy Co.                             | Christopher Schneider | Abstain     |                      |
| 5 | Northern Indiana Public Service Co.                | Michael K Wilkerson   | Affirmative |                      |
| 5 | Northern States Power Co.                          | Liam Noailles         | Affirmative |                      |
| 5 | Oklahoma Gas and Electric Co.                      | Kim Morphis           | Affirmative |                      |
| 5 | Orlando Utilities Commission                       | Richard Kinan         | Affirmative |                      |
| 5 | Pacific Gas and Electric Company                   | Richard J. Padilla    | Affirmative |                      |
| 5 | PacifiCorp Energy                                  | David Godfrey         | Affirmative |                      |
| 5 | Portland General Electric Co.                      | Gary L Tingley        | Affirmative |                      |
| 5 | PowerSouth Energy Cooperative                      | Tim Hattaway          | Negative    |                      |
| 5 | PPL Generation LLC                                 | Mark A. Heimbach      | Negative    | <a href="#">View</a> |
| 5 | Progress Energy Carolinas                          | Wayne Lewis           | Affirmative |                      |
| 5 | PSEG Power LLC                                     | Thomas Piascik        | Affirmative |                      |
| 5 | Reedy Creek Energy Services                        | Bernie Budnik         |             |                      |
| 5 | RRI Energy   | Thomas J. Bradish     | Negative    | <a href="#">View</a> |
| 5 | Sacramento Municipal Utility District              | Damon Smith           | Affirmative |                      |
| 5 | Salt River Project                                 | Glen Reeves           | Affirmative |                      |
| 5 | Seattle City Light                                 | Michael J. Haynes     | Affirmative |                      |
| 5 | Seminole Electric Cooperative, Inc.                | Brenda K. Atkins      |             |                      |
| 5 | South California Edison Company                    | Ahmad Sanati          | Affirmative |                      |
| 5 | Tenaska, Inc.                                      | Scott M. Helyer       | Affirmative |                      |
| 5 | Tri-State G & T Association Inc.                   | Barry Ingold          | Affirmative |                      |
| 5 | U.S. Army Corps of Engineers Northwestern Division | Karl Bryan            | Affirmative |                      |
| 5 | U.S. Bureau of Reclamation                         | Martin Bauer          |             |                      |
| 5 | Wisconsin Electric Power Co.                       | Linda Horn            | Affirmative |                      |
| 6 | AEP Marketing                                      | Edward P. Cox         | Affirmative |                      |
| 6 | Ameren Energy Marketing Co.                        | Jennifer Richardson   |             |                      |
| 6 | Bonneville Power Administration                    | Brenda S. Anderson    | Affirmative |                      |
| 6 | Consolidated Edison Co. of New York                | Nickesha P Carrol     | Affirmative |                      |
| 6 | Constellation Energy Commodities Group             | Chris Lyons           | Negative    |                      |
| 6 | Dominion Resources, Inc.                           | Louis S Slade         | Negative    | <a href="#">View</a> |
| 6 | Duke Energy Carolina                               | Walter Yeager         | Affirmative |                      |
| 6 | Entergy Services, Inc.                             | Terri F Benoit        |             |                      |
| 6 | Exelon Power Team                                  | Pulin Shah            | Negative    |                      |
| 6 | FirstEnergy Solutions                              | Mark S Travaglianti   | Affirmative | <a href="#">View</a> |

|    |  |                      |             |                      |
|----|--|----------------------|-------------|----------------------|
| 6  | Florida Power & Light Co.                                    | Silvia P Mitchell    |             |                      |
| 6  | Great River Energy   | Donna Stephenson     | Affirmative |                      |
| 6  | Kansas City Power & Light Co.                                | Thomas Saitta        |             |                      |
| 6  | Lincoln Electric System                                      | Eric Ruskamp         | Negative    | <a href="#">View</a> |
| 6  | Louisville Gas and Electric Co.                              | Daryn Barker         | Negative    | <a href="#">View</a> |
| 6  | Luminant Energy  | Thomas Burke         |             |                      |
| 6  | Manitoba Hydro   | Daniel Prowse        | Affirmative |                      |
| 6  | New York Power Authority                                     | Thomas Papadopoulos  | Negative    |                      |
| 6  | Northern Indiana Public Service Co.                          | Joseph O'Brien       | Negative    | <a href="#">View</a> |
| 6  | PacifiCorp   | Gregory D Maxfield   | Affirmative |                      |
| 6  | Progress Energy  | James Eckelkamp      | Affirmative |                      |
| 6  | PSEG Energy Resources & Trade LLC                            | James D. Hebson      | Affirmative |                      |
| 6  | Public Utility District No. 1 of Chelan County               | Hugh A. Owen         | Affirmative |                      |
| 6  | RRI Energy   | Trent Carlson        | Negative    | <a href="#">View</a> |
| 6  | Salt River Project   | Mike Hummel          | Affirmative |                      |
| 6  | Santee Cooper  | Suzanne Ritter       | Affirmative |                      |
| 6  | Seminole Electric Cooperative, Inc.                          | Trudy S. Novak       |             |                      |
| 6  | Southern California Edison Co.                               | Marcus V Lotto       | Affirmative |                      |
| 6  | Western Area Power Administration - UGP Marketing            | John Stonebarger     | Affirmative |                      |
| 6  | Xcel Energy, Inc.  | David F. Lemmons     | Affirmative |                      |
| 8  | Edward C Stein   | Edward C Stein       | Affirmative |                      |
| 8  | James A Maenner  | James A Maenner      | Affirmative |                      |
| 8  | JDRJC Associates   | Jim D. Cyrulewski    | Negative    | <a href="#">View</a> |
| 8  | Network & Security Technologies                              | Nicholas Lauriat     | Affirmative |                      |
| 8  | Power Energy Group LLC                                       | Peggy Abbadini       | Affirmative |                      |
| 8  | Roger C Zaklukiewicz   | Roger C Zaklukiewicz | Negative    | <a href="#">View</a> |
| 8  | Utility Services LLC   | Brian Evans-Mongeon  | Negative    | <a href="#">View</a> |
| 8  | Volkman Consulting, Inc.                                     | Terry Volkman        | Affirmative |                      |
| 8  | Wally Magda  | Wally Magda          | Affirmative |                      |
| 9  | Commonwealth of Massachusetts Department of Public Utilities | Donald E. Nelson     | Affirmative |                      |
| 9  | Maine Public Utilities Commission                            | Jacob A McDermott    | Abstain     |                      |
| 9  | National Association of Regulatory Utility Commissioners     | Diane J. Barney      | Affirmative |                      |
| 9  | New York State Department of Public Service                  | Thomas G Dvorsky     |             |                      |
| 9  | Oregon Public Utility Commission                             | Jerome Murray        |             |                      |
| 10 | Electric Reliability Council of Texas, Inc.                  | Kent Saathoff        | Affirmative |                      |
| 10 | Florida Reliability Coordinating Council                     | Linda Campbell       | Negative    | <a href="#">View</a> |
| 10 | Midwest Reliability Organization                             | Dan R Schoenecker    |             |                      |
| 10 | New York State Reliability Council                           | Alan Adamson         | Negative    |                      |
| 10 | Northeast Power Coordinating Council, Inc.                   | Guy V. Zito          | Negative    | <a href="#">View</a> |
| 10 | ReliabilityFirst Corporation                                 | Jacque Smith         | Affirmative |                      |
| 10 | SERC Reliability Corporation                                 | Carter B Edge        |             |                      |
| 10 | Southwest Power Pool Regional Entity                         | Stacy Dochoda        |             |                      |
| 10 | Western Electricity Coordinating Council                     | Louise McCarren      | Affirmative |                      |

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 Washington Office: 1120 G Street, N.W. : Suite 990 : Washington, DC 20005-3801

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## Consideration of Comments on Initial Ballot — Interpretation of CIP-001-1 for Covanta Energy (Project 2009-09)

### Summary Consideration:

Overall, the comments covered the following main ideas:

- Remove references to other standards in the interpretation
- Be more prescriptive as to who must be notified of sabotage events

The drafting team provided references to other standards as examples for information purposes only.

The drafting team resisted the suggestions for more prescription, indicating that doing so would create more confusion, not less. The specification of who ought to receive reports of sabotage events may not be applicable in all cases at all times. The drafting team maintains that the responsible entity shall make the determination as required in the standard.

If you feel that the drafting team overlooked your comments, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Gerry Adamski, at 609-452-8060 or at [gerry.adamski@nerc.net](mailto:gerry.adamski@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

| Voter   | Entity                      | Segment | Vote        | Comment   |
|---|-----------------------------|---------|-------------|---|
| Terry Harbour   | MidAmerican Energy Co.      | 1       | Affirmative | All references to other standards should be dropped. The responsible entity should determine and list the "appropriate parties"   |
| <p><b>Response:</b> Thank you for your comment. The drafting team acknowledges your concern about references to other standards. The interpretation clearly refers to other NERC standards as examples for information purposes only.</p> |                             |         |             |   |
| Robert Martinko   | FirstEnergy Energy Delivery | 1       | Affirmative | Although we have cast an Affirmative vote to this interpretation, we offer the following suggestions for improvement: 1. With regard to the question of whom the appropriate parties are in the Interconnection, you can point directly to the Purpose statement of CIP-001-1 which states "Disturbances or unusual occurrences, suspected or determined to be caused by sabotage, shall be reported to the appropriate systems, governmental agencies, and regulatory bodies." Therefore, one can conclude that the appropriate parties are "appropriate systems, governmental agencies, and regulatory bodies" which includes the impacted neighboring electric systems, law enforcement officials, and regulators such as FERC, NERC, RFC, etc. 2. With regard to the question of who in the Interconnection deems the parties to be |

<sup>1</sup> The appeals process is in the Reliability Standards Development Procedure: [http://www.nerc.com/files/RSDP\\_V6\\_1\\_12Mar07.pdf](http://www.nerc.com/files/RSDP_V6_1_12Mar07.pdf).

| Voter                                  | Entity                           | Segment  | Vote               | Comment  |
|--|----------------------------------|----------|--------------------|--|
|  |                                  |          |                    | <p>appropriate, we agree that there is no interconnection authority that has such a role. However, we feel that there is another potential answer to this question. We believe that as written the standard implies that the entities themselves have the responsibility of determining the appropriate parties while the compliance enforcement authority determines if the responsible entity has chosen the appropriate parties. 3. With regard to the phrase "physical or cyber event information" in the first sentence of the interpretation, we suggest changing this to "sabotage information". We feel our proposed wording is a more accurate description of the "information" to be communicated.</p>   |
| <p>Joanne<br/>Kathleen<br/>Borrell</p> | <p>FirstEnergy<br/>Solutions</p> | <p>3</p> | <p>Affirmative</p> | <p>Although we have cast an Affirmative vote to this interpretation, we offer the following suggestions for improvement: 1. With regard to the question of whom the appropriate parties are in the Interconnection, you can point directly to the Purpose statement of CIP-001-1 which states "Disturbances or unusual occurrences, suspected or determined to be caused by sabotage, shall be reported to the appropriate systems, governmental agencies, and regulatory bodies." Therefore, one can conclude that the appropriate parties are "appropriate systems, governmental agencies, and regulatory bodies" which includes the impacted neighboring electric systems, law enforcement officials, and regulators such as FERC, NERC, RFC, etc. 2. With regard to the question of who in the Interconnection deems the parties to be appropriate, we agree that there is no interconnection authority that has such a role. However, we feel that there is another potential answer to this question. We believe that as written the standard implies that the entities themselves have the responsibility of determining the appropriate parties while the compliance enforcement authority determines if the responsible entity has chosen the appropriate parties. 3. With regard to the phrase "physical or cyber event information" in the first sentence of the interpretation, we suggest changing this to "sabotage information". We feel our proposed wording is a more accurate description of the "information" to be communicated.</p> |

| Voter               | Entity                | Segment | Vote        | Comment  |
|---------------------|-----------------------|---------|-------------|--|
| Mark S Travaglianti | FirstEnergy Solutions | 6       | Affirmative | <p>Although we have cast an Affirmative vote to this interpretation, we offer the following suggestions for improvement: 1. With regard to the question of whom the appropriate parties are in the Interconnection, you can point directly to the Purpose statement of CIP-001-1 which states "Disturbances or unusual occurrences, suspected or determined to be caused by sabotage, shall be reported to the appropriate systems, governmental agencies, and regulatory bodies." Therefore, one can conclude that the appropriate parties are "appropriate systems, governmental agencies, and regulatory bodies" which includes the impacted neighboring electric systems, law enforcement officials, and regulators such as FERC, NERC, RFC, etc. 2. With regard to the question of who in the Interconnection deems the parties to be appropriate, we agree that there is no interconnection authority that has such a role. However, we feel that there is another potential answer to this question. We believe that as written the standard implies that the entities themselves have the responsibility of determining the appropriate parties while the compliance enforcement authority determines if the responsible entity has chosen the appropriate parties. 3. With regard to the phrase "physical or cyber event information" in the first sentence of the interpretation, we suggest changing this to "sabotage information". We feel our proposed wording is a more accurate description of the "information" to be communicated.</p> |
| Douglas Hohlbaugh   | Ohio Edison Company   | 4       | Affirmative | <p>Although we have cast an Affirmative vote to this interpretation, we offer the following suggestions for improvement: 1. With regard to the question of whom the appropriate parties are in the Interconnection, you can point directly to the Purpose statement of CIP-001-1 which states "Disturbances or unusual occurrences, suspected or determined to be caused by sabotage, shall be reported to the appropriate systems, governmental agencies, and regulatory bodies." Therefore, one can conclude that the appropriate parties are "appropriate systems, governmental agencies, and regulatory bodies" which includes the impacted neighboring electric systems, law enforcement officials, and regulators such as FERC, NERC, RFC, etc. 2. With regard to the question of who in the Interconnection deems the parties to be appropriate, we agree that there is no interconnection authority that has such a role. However, we feel that there is another potential answer to this question. We believe that as written the standard implies that the entities themselves have the responsibility of determining the appropriate parties while the compliance enforcement authority determines if the responsible entity has chosen the</p>   |



| Voter  | Entity                        | Segment | Vote        | Comment  |
|--|-------------------------------|---------|-------------|--|
|  |                               |         |             | appropriate parties. 3. With regard to the phrase "physical or cyber event information" in the first sentence of the interpretation, we suggest changing this to "sabotage information". We feel our proposed wording is a more accurate description of the "information" to be communicated.  |
| Kenneth Dresner  | FirstEnergy Solutions         | 5       | Affirmative | Comments Although we have cast an Affirmative vote to this interpretation, we offer the following suggestions for improvement: 1. With regard to the question of whom the appropriate parties are in the Interconnection, you can point directly to the Purpose statement of CIP-001-1 which states "Disturbances or unusual occurrences, suspected or determined to be caused by sabotage, shall be reported to the appropriate systems, governmental agencies, and regulatory bodies." Therefore, one can conclude that the appropriate parties are "appropriate systems, governmental agencies, and regulatory bodies" which includes the impacted neighboring electric systems, law enforcement officials, and regulators such as FERC, NERC, RFC, etc. 2. With regard to the question of who in the Interconnection deems the parties to be appropriate, we agree that there is no interconnection authority that has such a role. However, we feel that there is another potential answer to this question. We believe that as written the standard implies that the entities themselves have the responsibility of determining the appropriate parties while the compliance enforcement authority determines if the responsible entity has chosen the appropriate parties. 3. With regard to the phrase "physical or cyber event information" in the first sentence of the interpretation, we suggest changing this to "sabotage information". We feel our proposed wording is a more accurate description of the "information" to be communicated. |
| <p><b>Response:</b> Thank you for your comments. The drafting team acknowledges your point about the purpose statement. As the statement is clear, there is not a need to repeat in the requirement. In regard to your second comment, the drafting team interprets the standard to require responsible entities to make the determination of appropriate parties. Lastly, the drafting team asserts that the scope of the information includes physical and cyber events. The cause or nature of any event is sometimes not immediately apparent, and therefore the phrase "sabotage information" is presumptive and may be inaccurate.</p> |                               |         |             |  |
| Harvie D. Beavers  | Colmac Clarion/Piney Creek LP | 5       | Affirmative | Minimum reporting responsibility is known and identical to other elements of reporting and could be clearly defined in this answer. Statement concerning 'other' obligations cannot, and should not be specific, just as written in this response.   |

| Voter   | Entity                    | Segment | Vote        | Comment  |
|---|---------------------------|---------|-------------|--|
| <p><b>Response:</b> Thank you for your comment. The drafting team interprets the standard to require responsible entities to make the determination of appropriate parties; therefore, "minimum reporting responsibility" or "other obligations" is for the responsible entity to identify.</p> |                           |         |             |  |
| Lee Schuster  | Florida Power Corporation | 3       | Affirmative | Progress Energy agrees with the proposed NERC interpretation, and is voting Affirmative. However, Progress Energy believes the interpretation can be improved by deleting the sentence "For example, reporting responsibilities result from NERC standards IRO-001 Reliability Coordination " Responsibilities and Authorities, COM-002-2 Communication and Coordination, and TOP-001 Reliability Responsibilities and Authorities, among others." The preceding sentence, if included, could cause confusion that there is some direct linkage to or additional requirements for IRO-001, COM-002, or TOP-001 as it relates to this CIP-001-1 interpretation. |
| Sammy Roberts   | Progress Energy Carolinas | 1       | Affirmative | Progress Energy agrees with the proposed NERC interpretation, and is voting Affirmative. However, Progress Energy believes the interpretation can be improved by deleting the sentence "For example, reporting responsibilities result from NERC standards IRO-001 Reliability Coordination " Responsibilities and Authorities, COM-002-2 Communication and Coordination, and TOP-001 Reliability Responsibilities and Authorities, among others." The preceding sentence, if included, could cause confusion that there is some direct linkage to or additional requirements for IRO-001, COM-002, or TOP-001 as it relates to this CIP-001-1 interpretation. |
| Sam Waters  | Progress Energy Carolinas | 3       | Affirmative | Progress Energy agrees with the proposed NERC interpretation, and is voting Affirmative. However, Progress Energy believes the interpretation can be improved by deleting the sentence "For example, reporting responsibilities result from NERC standards IRO-001 Reliability Coordination " Responsibilities and Authorities, COM-002-2 Communication and Coordination, and TOP-001 Reliability Responsibilities and Authorities, among others." The preceding sentence, if included, could cause confusion that there is some direct linkage to or additional requirements for IRO-001, COM-002, or TOP-001 as it relates to this CIP-001-1 interpretation. |
| <p><b>Response:</b> Thank you for your comment. The drafting team acknowledges your concern about references to other standards. The interpretation clearly refers to other NERC standards as examples for information purposes only.</p>   |                           |         |             |  |

| Voter  | Entity                              | Segment | Vote        | Comment  |
|--|-------------------------------------|---------|-------------|--|
| Kenneth Goldsmith  | Alliant Energy Corp. Services, Inc. | 4       | Affirmative | While I am voting affirmative on this ballot, I believe the interpretation process should just answer the question and not elaborate with further discussion since the additional discussion may introduce additional questions.   |
| <b>Response:</b> Thank you for your comment. The drafting team acknowledges your concern about "further discussion." The team offered supporting explanation for information purposes in order to minimize additional questions.   |                                     |         |             |  |
| Bob C. Thomas  | Illinois Municipal Electric Agency  | 4       | Negative    | Additional clarification needed.   |
| Charles A. Freibert  | Louisville Gas and Electric Co.     | 3       | Negative    | As currently worded, the interpretation sheds no more light on what it is registered entities need to do than does the requirement itself. There is no reason why NERC cannot provide more clarity to registered entities endeavoring to comply with vague requirements. |
| Charlie Martin   | Louisville Gas and Electric Co.     | 5       | Negative    | As currently worded, the interpretation sheds no more light on what it is registered entities need to do than does the requirement itself. There is no reason why NERC cannot provide more clarity to registered entities endeavoring to comply with vague requirements. |
| Daryn Barker   | Louisville Gas and Electric Co.     | 6       | Negative    | As currently worded, the interpretation sheds no more light on what it is registered entities need to do than does the requirement itself. There is no reason why NERC cannot provide more clarity to registered entities endeavoring to comply with vague requirements. |
| <b>Response:</b> Thank you for your comment. The drafting team may only interpret what a standard requires and not create new requirements. As such, the drafting team views this standard to require the responsible entities to determine which appropriate parties ought to receive sabotage information. |                                     |         |             |  |

| Voter   | Entity                   | Segment | Vote     | Comment   |
|---|--------------------------|---------|----------|---|
| Steve Alexanderson  | Central Lincoln PUD      | 3       | Negative | Central Lincoln votes no. The drafting team suggests guidance can be sought from other specified and unspecified standards, but the example standards say nothing regarding the reporting of physical or cyber security events. We are unaware of any other standard other than CIP-001 that deals with the communication of these events. In addition, the third paragraph conflicts with the second. The third says the drafting team knows of no interconnection authority who deems which parties may be appropriate. The second says it is the registered entity that must identify the appropriate parties (and therefore has the authority to make the determination.) |
| <p><b>Response:</b> Thank you for your comment. The drafting team acknowledges your concern about references to other standards. The interpretation clearly refers to other NERC standards as examples for information purposes only.</p> <p>The drafting team interprets this standard to require the responsible entities to determine which appropriate parties ought to receive sabotage information. As such, there is no interconnection authority other than the responsible entity itself that must make the determination.</p> |                          |         |          |   |
| Larry Monday  | E.ON U.S. LLC            | 1       | Negative | E ON U.S. believes NERC CIPC should more appropriately be providing the subject interpretation rather than the more narrowly focused CS 706 Standards Drafting Team. As currently worded, the interpretation sheds no more light on what it is registered entities need to do than does the requirement itself. There is no reason why NERC cannot provide more clarity to registered entities endeavoring to comply with vague requirements.   |
| <p><b>Response:</b> Thank you for your comment. The drafting team may only interpret what a standard requires and not create new requirements. As such, the drafting team views this standard to require the responsible entities to determine which appropriate parties ought to receive sabotage information.</p>   |                          |         |          |   |
| Ajay Garg   | Hydro One Networks, Inc. | 1       | Negative | Hydro One casts a negative vote in the interpretation of the standard CIP-001-1 requested by Covanta Energy with the following comments. 1. Requirement R2 of CIP-001-1 is limited to require that the RC, BA, TOP, GOP and LSE have procedures in place for the communication of information concerning sabotage events. 2. Requirement R2 does not necessitate that specific "appropriate entities" be identified in the procedures. The "appropriate entities" will be determined by the incident and potential impact. 3. The list of entities should not be considered to be required as auditable evidence in a compliance audit.                                       |

| Voter  | Entity                                   | Segment | Vote     | Comment   |
|--|--|---------|----------|---|
| Michael D. Penstone  | Hydro One Networks, Inc.                 | 3       | Negative | Hydro One casts a negative vote in the interpretation of the standard CIP-001-1 requested by Covanta Energy with the following comments. 1. Requirement R2 of CIP-001-1 is limited to require that the RC, BA, TOP, GOP and LSE have procedures in place for the communication of information concerning sabotage events. 2. Requirement R2 does not necessitate that specific "appropriate entities" be identified in the procedures. The "appropriate entities" will be determined by the incident and potential impact. 3. The list of entities should not be considered to be required as auditable evidence in a compliance audit. |
| <p><b>Response:</b> Thank you for your comment. The drafting team may only interpret what a standard requires and not create new requirements. As such the drafting team views this standard to require the responsible entities to determine which appropriate parties ought to receive sabotage information. In order to comply with the Requirement R2, a procedure must be in place for communication of these events. The omission of a list of recipients makes no logical sense because timely communication would be impaired without one.</p> |  |         |          |   |
| Donald Gilbert   | JEA                                      | 5       | Negative | I am concerned that the proposed clarification does not sufficiently define the parties to whom notification should be provided. The reference to obligations arising from "agreements, processes and procedures" may be over reaching beyond the benefits of NERC's reliability goals, since it may encompass contractual or other obligations that are not related to grid reliability. However, it may be under reaching by excluding certain NERC registered entities performing reliability functions who have a responsibility for responding to the information, and are in the appropriate hierarchy for reporting purposes.    |
| <p><b>Response:</b> Thank you for your comment. The drafting team may only interpret what a standard requires and not create new requirements. As such, the drafting team views this standard to require the responsible entities to determine which appropriate parties ought to receive sabotage information.</p>  |  |         |          |   |
| Linda Campbell   | Florida Reliability Coordinating Council | 10      | Negative | I do not agree with the interpretation as written. The reference to COM-002 as an example does not help as it uses "appropriate" to describe the RC's, BA's and TOP's that need to be communicated to so it has the same problem. The reference back to R2 in CIP-001 does not help either as that is the requirement that is the subject of the interpretation. I would have rather seen something like - appropriate means their RC and adjacent BA's and TOP. I do not think the interpretation helps at all so it does nothing to append it to the standard.  |

| Voter  | Entity                | Segment | Vote     | Comment   |
|--|-----------------------|---------|----------|---|
| <p><b>Response:</b> Thank you for your comment. The drafting team acknowledges your concern about references to other standards. The interpretation clearly refers to other NERC standards as examples for information purposes in order to minimize confusion.</p> <p>While specifying only the "RC and adjacent BA's and TOP" is more definitive and clear, such a prescriptive interpretation may not fit all situations. The drafting team interprets this standard to require the responsible entities to determine which appropriate parties ought to receive sabotage information.</p>  |                       |         |          |   |
| Roger C Zaklukiewicz   | Roger C Zaklukiewicz  | 8       | Negative | Identification of the process for reporting events should be well documented but not the "appropriate entities" as reequired by CIP-001-1 Requirement R2; they will be determined by the incident and potential impact(s).  |
| <p><b>Response:</b> Thank you for your comment. The drafting team may only interpret what a standard requires and not create new requirements. As such, the drafting team views this standard to require the responsible entities to determine which appropriate parties ought to receive sabotage information. We agree that in order to comply with the Requirement R2, a procedure must be in place for reporting of these events. The omission of a list of recipients from the procedure makes no logical sense because timely communication would be impaired without one.</p>   |                       |         |          |   |
| Kathleen Goodman   | ISO New England, Inc. | 2       | Negative | ISO New England believe identifying the process for reporting events should be documented, as required in CIP-001-1 Requirement R2, but not the "appropriate entities." The "appropriate entities" will be determined by the incident and potential impact. Also, we also believe that, the correct response to "who within the Interconnection hierarchy deems parties to be appropriate" would be the reporting entity's Reliability Coordinator. |
| <p><b>Response:</b> Thank you for your comment. The drafting team may only interpret what a standard requires and not create new requirements. As such, the drafting team views this standard to require the responsible entities to determine which appropriate parties ought to receive sabotage information. We agree that in order to comply with the Requirement R2, a procedure must be in place for reporting of these events. The omission of a list of recipients from the procedure makes no logical sense because timely communication would be impaired without one.</p> <p>With regard to "who within the Interconnection hierarchy deems parties to be appropriate," your suggestion that it be the reporting entity's Reliability Coordinator may be appropriate in your region. The drafting team is not aware of an explicit authorization for the Reliability Coordinator to determine appropriate parties for reporting of physical and cyber events.</p> |                       |         |          |   |
| Garry Baker  | JEA                   | 3       | Negative | JEA feels the referenced obligations arising from "agreements, processes and procedures" should be removed. These may be overly inclusive, since they may include obligations that are not related to grid reliability and may fail to include parties that perform one or more reliability functions.  |

| Voter   | Entity                         | Segment | Vote     | Comment  |
|---|--------------------------------|---------|----------|--|
| <p><b>Response:</b> Thank you for your comment. The drafting team provided examples of the types of obligations that may require reporting. It is not intended to be limiting and was offered for explanatory purposes.</p>               |                                |         |          |  |
| Bruce Merrill   | Lincoln Electric System        | 3       | Negative | LES believes the interpretation process should just answer the question asked, and not elaborate with further discussion since this additional discussion may introduce additional questions. The references to the IRO-001, COM-002-2, and TOP-001 standards in this Interpretation only add confusion.   |
| Dennis Florom   | Lincoln Electric System        | 5       | Negative | LES believes the interpretation process should just answer the question asked, and not elaborate with further discussion since this additional discussion may introduce additional questions. The references to the IRO-001, COM-002-2, and TOP-001 standards in this Interpretation only add confusion.   |
| Eric Ruskamp  | Lincoln Electric System        | 6       | Negative | LES believes the interpretation process should just answer the question asked, and not elaborate with further discussion since this additional discussion may introduce additional questions. The references to the IRO-001, COM-002-2, and TOP-001 standards in this Interpretation only adds confusion.  |
| <p><b>Response:</b> Thank you for your comment. The drafting team acknowledges your concern about references to other standards. The interpretation clearly refers to other NERC standards as examples for information purposes only.</p> |                                |         |          |  |
| Tom Foreman   | Lower Colorado River Authority | 5       | Negative | LPPC members are concerned that the proposed clarification poorly defines the parties to whom notification should be provided. On the one hand, the reference to obligations arising from "agreements, processes and procedures" may be overly inclusive from the standpoint of NERC's reliability mission, since it may encompass contractual or other obligations that are not related to grid reliability. On the other hand, the interpretation may fail to include all NERC registered parties performing reliability functions who have a responsibility for responding to the information, and are in the appropriate hierarchy for reporting purposes. We also note that the list of such entities will vary by functional entity, and regionally. Given the wide range of potential parties to whom reporting of this type may be appropriate, LPPC recommends that the proposed clarification be rejected. While LPPC would not rule out the potential for some further definition, its members believe that the industry would be better served, at this time, by permitting responsible entities to devise their |

| Voter   | Entity             | Segment | Vote     | Comment  |
|---|--------------------|---------|----------|--|
|   |                    |         |          | own list of appropriate parties to whom reports should be made.  |
| <p><b>Response:</b> Thank you for your comment. The drafting team provided examples of the types of obligations that may require reporting. It is not intended to be limiting and was offered for explanatory purposes. The drafting team agrees with your comment that this standard requires the responsible entity to determine which appropriate parties ought to receive sabotage information and to devise their own lists.</p> |                    |         |          |  |
| Ray Mammarella  | PP&L, Inc.         | 1       | Negative | NERC and/or its representatives should provide clear direction to registered entities when responding to interpretations. The response to this interpretation is too general and therefore, of little value to the registered entities. A vague response may result in a gap in reliability that otherwise could be identified and cared for; such a response also makes it unnecessarily difficult to ascertain if an entity is compliant or not. |
| Mark A. Heimbach  | PPL Generation LLC | 5       | Negative | NERC and/or its representatives should provide clear direction to registered entities when responding to interpretations. The response to this interpretation is of little value to the registered entities.   |
| <p><b>Response:</b> Thank you for your comment. The drafting team may only interpret what a standard requires and not create new requirements. As such, the drafting team views this standard to require the responsible entities to determine which appropriate parties ought to receive sabotage information.</p>   |                    |         |          |  |



| Voter             | Entity     | Segment | Vote     | Comment   |
|-------------------|------------|---------|----------|---|
| Thomas J. Bradish | RRI Energy | 5       | Negative | RRI voted negative given the ambiguous phrases such as "appropriate parties." Such ambiguity would only serve to harm an auditor's otherwise objective audit. These ambiguous phrases may have been acceptable when the Reliability Standards were voluntary. Now that the Standards are mandatory and enforceable the Requirements must be clear and unambiguous. The Interpretation states that "[T]he drafting team asserts that those entities to which communication sabotage events is appropriate would be identified by the reporting entity and documented within the procedure required in CIP-001-1 Requirement R2." We interpret this to mean that as long as the reporting entity does what its procedure states then it is in compliance. The purpose of the Standards should not only be to make sure that reporting entities do what they state they will do but that they will perform in accordance with the Requirement to maintain an Acceptable Level of Reliability ("ALR"). In our opinion, it makes more sense for the Standard to require the notification of sabotage to the local police, Department of Homeland Security and the Reliability Coordinator? Taken at face-value the Interpretation allows reporting entities to establish CIP-001 procedures that report the sabotage event to upper management as the appropriate party. Such a result will serve the purpose of "papering" the Requirement with a procedure so as to be auditably compliant but may not serve the purpose of maintaining ALR. |
| Trent Carlson     | RRI Energy | 6       | Negative | RRI voted negative given the ambiguous phrases such as "appropriate parties." Such ambiguity would only serve to harm an auditor's otherwise objective audit. In addition, such ambiguous concepts could require an auditor (and a Registered Entity's contracts department) to review every contract ever entered by that Entity. Such a potential application of this vague provision significantly increases the full time employee count of both Regional Entity audit teams and Registered Entity contract compliance departments, with little or no benefit to the reliability of the Bulk Electric System. These ambiguous phrases may have been acceptable when the Reliability Standards were voluntary. Now that the Standards are mandatory and enforceable the Requirements must be clear and unambiguous. The Interpretation states that "[T]he drafting team asserts that those entities to which communication sabotage events is appropriate would be identified by the reporting entity and documented within the procedure required in CIP-001-1 Requirement R2." We interpret this to mean that as long as the reporting entity does what its procedure states then it is in compliance. The purpose of the Standards should not only be to make sure that reporting entities do what they state they will do but that they will perform in  |

| Voter  | Entity  | Segment | Vote     | Comment   |
|--|---|---------|----------|---|
|  |   |         |          | <p>accordance with the Requirement to maintain an Acceptable Level of Reliability ("ALR"). In our opinion, it makes more sense for the Standard to require the notification of sabotage to the local police, Department of Homeland Security and the Reliability Coordinator? Taken at face-value the Interpretation allows reporting entities to establish CIP-001 procedures that report the sabotage event to upper management as the appropriate party. Such a result will serve the purpose of "papering" the Requirement with a procedure so as to be auditably compliant but may not serve the purpose of maintaining ALR.</p>   |
| <p><b>Response:</b> Thank you for your comment. The drafting team agrees that ambiguity is undesirable. However, the drafting team interprets this standard to unambiguously require the responsible entity to determine which parties ought to receive reports of sabotage events. Furthermore, the responsible entity shall have a procedure in place (written by the responsible entity). Such a procedure ought to include the parties that the responsible entity deems appropriate for the receipt of sabotage event reports.</p> <p>With respect to your closing comment, the drafting team asserts that the purpose of any standard, including this one, is for ensuring an adequate level of reliability.</p> |   |         |          |   |
| Jim D. Cyrulewski  | JDRJC Associates                                  | 8       | Negative | Should be left to the responsible entity to define in their Business Practice who are the appropriate parties.  |
| <p><b>Response:</b> Thank you for your comment. The drafting team agrees that this standard requires the responsible entity to determine which parties ought to receive reports of physical and cyber events.</p>  |   |         |          |   |
| John D. Martinsen  | Public Utility District No. 1 of Snohomish County | 4       | Negative | <p>The District is concerned that the proposed clarification poorly defines the parties to whom notification should be provided. The reference to obligations arising from "agreements, processes, and procedures" may be overly inclusive from the standpoint of NERC's reliability mission, since it may encompass contractual or other obligations that are not related to grid reliability. Given the wide range of potential parties to whom reporting of this type may be appropriate, the District supports that the proposed clarification be rejected. The District would not rule out the potential for some further definition, we believe that the industry would be better served at this time, by permitting responsible entities to devise their own list of appropriate parties to whom reports should be made.</p> |

| Voter  | Entity                              | Segment | Vote     | Comment  |
|--|-------------------------------------|---------|----------|--|
| <p><b>Response:</b> Thank you for your comment. The drafting team provided examples of the types of obligations that may require reporting. It is not intended to be limiting and was offered for explanatory purposes. The drafting team agrees with your comment that this standard requires the responsible entity to determine which appropriate parties ought to receive sabotage information and to devise their own lists.</p>  |                                     |         |          |  |
| David H. Boguslawski   | Northeast Utilities                 | 1       | Negative | The drafting team asserts that those entities to which communicating sabotage events is appropriate would be identified by the reporting entity and documented within the procedure required in CIP-001-1 Requirement R2. NU believes that identifying the process for reporting events should be documented, as required in CIP-001-1 Requirement R2, but not the "appropriate entities". NU asserts that the "appropriate entities" will be determined by the incident and potential impact which thereby makes the development of a "procedural list of appropriate parties" for all possible situations impractical. |
| <p><b>Response:</b> Thank you for your comment. The drafting team views this standard to require the responsible entities to determine which appropriate parties ought to receive sabotage information. We agree that in order to comply with the Requirement R2, a procedure must be in place for reporting of these events. The omission of a list of recipients from the procedure makes no logical sense because timely communication would be impaired without one.</p> |                                     |         |          |  |
| Joseph O'Brien   | Northern Indiana Public Service Co. | 6       | Negative | The final sentence of the interpretation appears to be a disclaimer. Variance in Regional Entity definitions of the BES should be eliminated by NERC especially since there are entities that span multiple regions.   |
| <p><b>Response:</b> Thank you for your comment. The drafting team was merely answering the question it was asked. The drafting team is not aware of an explicit authorization for any entity "within the Interconnection hierarchy" to determine appropriate parties for reporting of physical and cyber events.</p>   |                                     |         |          |  |
| Greg Tillitson   | California ISO                      | 2       | Negative | The interpretation as worded does not answer the question. In other words, the interpretation needs interpretation, which is not acceptable.   |
| <p><b>Response:</b> Thank you for your comment. The drafting team may only interpret what a standard requires and not create new requirements. As such, the drafting team views this standard to require the responsible entities to determine which appropriate parties ought to receive sabotage information.</p>  |                                     |         |          |  |
| Samuel   | Covanta                             | 5       | Negative | The interpretation failed to answer the key question.  |

| Voter  | Entity                   | Segment | Vote     | Comment  |
|--|--------------------------|---------|----------|--|
| Cabassa  | Energy                   |         |          |  |
| <p><b>Response:</b> Thank you for your comment. The drafting team may only interpret what a standard requires and not create new requirements. As such, the drafting team views this standard to require the responsible entities to determine which appropriate parties ought to receive sabotage information. The key question in the drafting team's view is "who is responsible for determining" the appropriate parties to whom to report physical and cyber events; the drafting team believes it is the responsible entity.</p> |                          |         |          |  |
| Jalal (John) Babik   | Dominion Resources, Inc. | 3       | Negative | The interpretation to the standard CIP-001-1 R3 "appropriate parties in the Interconnection" to whom sabotage events must be communicated by RCs, TOPs, BAs, GOPs, and LSEs is not clearly defined. The standard drafting team cites three existing standards from which reporting requirements can be derived. Two of them, IRO-001 and TOP-001, have nothing to do with sabotage reporting, and to cite them in this way is an indirect interpretation of those two standards that is outside the ANSI accredited stakeholder process. The third standard cited, COM-002, is marginally relevant, to ensure communications by operating personnel are effective. |
| Mike Garton  | Dominion Resources, Inc. | 5       | Negative | The interpretation to the standard CIP-001-1 R3 "appropriate parties in the Interconnection" to whom sabotage events must be communicated by RCs, TOPs, BAs, GOPs, and LSEs is not clearly defined. The standard drafting team cites three existing standards from which reporting requirements can be derived. Two of them, IRO-001 and TOP-001, have nothing to do with sabotage reporting, and to cite them in this way is an indirect interpretation of those two standards that is outside the ANSI accredited stakeholder process. The third standard cited, COM-002, is marginally relevant, to ensure communications by operating personnel are effective. |
| Louis S Slade  | Dominion Resources, Inc. | 6       | Negative | The interpretation to the standard CIP-001-1 R3 "appropriate parties in the Interconnection" to whom sabotage events must be communicated by RCs, TOPs, BAs, GOPs, and LSEs is not clearly defined. The standard drafting team cites three existing standards from which reporting requirements can be derived. Two of them, IRO-001 and TOP-001, have nothing to do with sabotage reporting, and to cite them in this way is an indirect interpretation of those two standards that is outside the ANSI accredited stakeholder process. The third standard cited, COM-002, is marginally relevant, to ensure communications by operating personnel are effective. |

| Voter  | Entity                             | Segment | Vote     | Comment  |
|--|------------------------------------|---------|----------|--|
| William L. Thompson  | Dominion Virginia Power            | 1       | Negative | The interpretation to the standard CIP-001-1 R3 “appropriate parties in the Interconnection” to whom sabotage events must be communicated by RCs, TOPs, BAs, GOPs, and LSEs is not clearly defined. The standard drafting team cites three existing standards from which reporting requirements can be derived. Two of them, IRO-001 and TOP-001, have nothing to do with sabotage reporting, and to cite them in this way is an indirect interpretation of those two standards that is outside the ANSI accredited stakeholder process. The third standard cited, COM-002, is marginally relevant, to ensure communications by operating personnel are effective. |
| <b>Response:</b> Thank you for your comment. The drafting team acknowledges your concern about references to other standards. The interpretation clearly refers to other NERC standards as examples for information purposes only.   |                                    |         |          |  |
| Edwin Les Barrow   | City Public Service of San Antonio | 3       | Negative | The language about determination of the parties to whom a responsible entity should report be based on processes or procedures, or contracts with other parties is too broad and may create obligations to report that are not related to reliability. The interpretation should simply state that the drafting team asserts that those entities to which communicating sabotage events is appropriate would be identified by the reporting entity and documented within the procedure required in CIP-001-1.  |
| <b>Response:</b> Thank you for your comment. The drafting team provided examples of the types of obligations that may require reporting. It is not intended to be limiting and was offered for explanatory purposes. The drafting team agrees with your comment that this standard requires the responsible entity to determine which appropriate parties ought to receive sabotage information and to devise their own lists.           |                                    |         |          |  |
| Anita Lee  | Alberta Electric System Operator   | 2       | Negative | The NERC Response implies that a responsible entity must review every standard, guideline, process, procedure, and operating agreement that may affect the responsible entity to determine if there may be a related obligation or responsibility to report a sabotage event. Such an open ended requirement cannot be effectively measured by an auditor, since it requires proof of a negative assertion. That is, a responsible entity cannot provide any evidence to establish that no document exists that has not been reviewed for a possible reporting obligation. Therefore, this is cannot be implemented as a standard.                                 |
| <b>Response:</b> The drafting team provided examples of the types of obligations that may require reporting. It is not intended to be limiting and was offered for explanatory purposes. The drafting team agrees with your comment that this standard requires the responsible entity to determine which appropriate parties ought to receive sabotage information and believes the responsible entities should devise their own lists. |                                    |         |          |  |

| Voter  | Entity                      | Segment | Vote     | Comment   |
|--|-----------------------------|---------|----------|---|
| Ted E. Hobson  | JEA                         | 1       | Negative | The reference to obligations arising from "agreements, processes and procedures" is too broad. Otherwise, this interpretation is ok.  |
| <b>Response:</b> The drafting team provided examples of the types of obligations that may require reporting. These were offered for explanatory purposes.  |                             |         |          |   |
| Jonathan Appelbaum   | Long Island Power Authority | 1       | Negative | the reference to obligations arising from "agreements, processes and procedures" may be overly inclusive from the standpoint of NERC's reliability mission, since it may encompass contractual or other obligations that are not related to BES reliability. On the other hand, the interpretation may fail to include all NERC registered parties performing reliability functions who have a responsibility for responding to the information, and are in the appropriate hierarchy for reporting purposes. Also note that the list of such entities will vary by functional entity, and regionally. Responsible entities should devise their own list of appropriate parties to whom reports should be made, subject to oversight of the auditing teams.   |
| <b>Response:</b> Thank you for your comment. The drafting team provided examples of the types of obligations that may require reporting. It is not intended to be limiting and was offered for explanatory purposes. The drafting team agrees with your comment that this standard requires the responsible entity to determine which appropriate parties ought to receive sabotage information and to devise their own lists. |                             |         |          |   |
| Catherine Koch   | Puget Sound Energy, Inc.    | 1       | Negative | The response indicates the collective group of entities to which reporting must occur based on responsibilities and/or obligations is focused on "physical or cyber security event information". This could easily be interpreted to mean events relative to critical assets or critical cyber assets as defined by CIP-002 through CIP-009. While the drafting team did not write this, the terms are so close to that which is within those standards, PSE believes entities could become confused by this. In fact the reporting is focused on "sabotage" in general which could relate to assets and actions far outside of what's deemed critical by CIP-002. PSE finds the inclusion of the examples IRO-001, COM-002 and TOP-001 a little confusing as well. It seems that the drafting team is providing guidance on how an entity can determine its responsibilities/obligations. However the term "reporting responsibilities" may be easily misinterpreted to imply communication of more than sabotage information under this standard. It may be helpful to begin the response by stating it's the registered entity's responsibility to determine who "appropriate parties" are. From there the drafting team can provide guidance on how an entity determines this and |

| Voter   | Entity                                      | Segment | Vote     | Comment   |
|---|---|---------|----------|---|
|   |   |         |          | then documents this which was a good reminder. The NERC glossary defines the term Interconnection to be "When capitalized, any one of the three major electric system networks in North American: Eastern, Western, and ERCOT. It appears by determining appropriateness through agreements and procedures with specific parties, this doesn't get too overwhelming and keeps from requiring an entity to notify any other entity for which they have no connection with, but happen to be in the same major electric system network. Some clarity of that in this interpretation would be appreciated. |
| <p><b>Response:</b> The drafting team agrees with your comment that this standard requires the responsible entity to determine which appropriate parties ought to receive sabotage information and devise their own lists as part of their internal procedures.</p>   |   |         |          |   |
| Scott A Etnoyer   | Constellation Power Source Generation, Inc. | 5       | Negative | This interpretation does not provide adequate resolution to the identified problem in Covanta's request for interpretation. It still leaves open to interpretation between auditors and responsible entities the issue of whether the responsible entity identified appropriate interconnection parties.  |
| <p><b>Response:</b> Thank you for your comment. The drafting team may only interpret what a standard requires and not create new requirements. As such, the drafting team views this standard to require the responsible entities to determine which appropriate parties ought to receive sabotage information.</p> |   |         |          |   |
| Guy V. Zito   | Northeast Power Coordinating Council, Inc.  | 10      | Negative | This interpretation implies that the reporting entity can communicate to whomever they place on their "appropriate parties" list. The list can be developed through review of any agreements the reporting entity believes are applicable for sabotage reporting. The background agreements from which the entries to these lists will not be reviewed during a compliance audit. This results in an audit confirming that the entity has some list (which is an unfounded list) for a requirement- R2- that only stipulates an entity must have have a procedure.                                      |
| <p><b>Response:</b> Thank you for your comment. The drafting team views this standard to require the responsible entities to determine which appropriate parties ought to receive sabotage information. In order to comply with the Requirement R2, a procedure must be in place for</p>                            |   |         |          |   |

| Voter  | Entity                                  | Segment | Vote     | Comment  |
|--|---|---------|----------|--|
| reporting of these events. The drafting team asserts that omission of a list of recipients from the procedure makes no logical sense because timely communication would be impaired without one.   |   |         |          |  |
| John J. Blazekovich  | Exelon Energy                           | 1       | Negative | This interpretation does not provide clarification, and in fact makes the requirement even more ambiguous. We believe that the notification should be made to the appropriate Reliability Coordinator so that the RC may cascade the message to other RC's in North America.   |
| <p><b>Response:</b> Thank you for your comment. The drafting team agrees that ambiguity is undesirable. However, the drafting team interprets this standard to unambiguously require the responsible entity to determine which parties ought to receive reports of sabotage events. With regard to your suggestion to notify the reporting entity's Reliability Coordinator may be appropriate in your region. As such, your list of appropriate parties will include the RC to whom you report physical and cyber events.</p>   |   |         |          |  |
| Kirit S. Shah  | Ameren Services                         | 1       | Negative | We agree with the second part of the interpretation that appropriate parties would be identified by the reporting entity. From our perspective, this would include a procedure to communicate internally and with its own and neighboring RC, BA, and TOP as appropriate. But we have some concerns with the first part of the interpretation because it is vague as it implies that the list of these entities should result from requirements of the other standards. Should the entity go through each requirement and prepare a list to meet and show compliance with the CIP-001, R2? |
| <p><b>Response:</b> Thank you for your comment. The drafting team acknowledges your concern about references to other standards. The interpretation clearly refers to other NERC standards as examples for information purposes only.</p> <p>The drafting team provided examples of the types of obligations that may require reporting. It is not intended to be all encompassing and was offered for explanatory purposes. The drafting team agrees with your comment that this standard requires the responsible entity to determine which appropriate parties ought to receive sabotage information and to devise their own lists.</p> |   |         |          |  |
| Kim Warren   | Independent Electricity System Operator | 2       | Negative | We are of the view that the interpretation needs to be more specific regarding the parties to be communicated with since significant doubt would remain as to whether or not the required communication processes have been established with all necessary parties. We further recommend that Requirement R2 be revised to explicitly identify such parties when CIP-001 next comes up for revision.   |



| Voter   | Entity               | Segment | Vote     | Comment  |
|---|----------------------|---------|----------|--|
| <p><b>Response:</b> Thank you for your comment. The drafting team believes that a prescriptive interpretation may not fit all situations. The suggestion to revise CIP-001 is outside the scope of the RFI process; however, Project 2009-01 Disturbance and Sabotage Reporting, which is in its early stages, involves revising CIP-001 and EOP-004.</p>   |                      |         |          |  |
| Brian Evans-Mongeon   | Utility Services LLC | 8       | Negative | <p>We feel the interpretation is too vague and fails to address the request overall. "Appropriate entities" should be those organizations that need to know given the event and the circumstances. Within an interconnection, the entities that should be made aware of the event are the Registered Entity's Reliability Coordinator and or Transmission Provider(s).</p> |
| <p><b>Response:</b> Thank you for your comment. The drafting team believes that specifying only the Reliability Coordinator and Transmission Provider may be more definitive and clear; however, such a prescriptive interpretation may not fit all situations. The drafting team interprets this standard to require the responsible entities to determine which appropriate parties ought to receive sabotage information and to incorporate the determination in a documented procedure.</p> |                      |         |          |  |



NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Standards Announcement Recirculation Ballot Window Open September 29–October 9, 2009

Now available at: <https://standards.nerc.net/CurrentBallots.aspx>

### **Project 2009-09: Interpretation of CIP-001-1 for Covanta Energy**

A recirculation ballot window for an interpretation of standard CIP-001-1 — Sabotage Reporting Requirement R2 for Covanta Energy is now open **until 8 p.m. EDT on October 9, 2009**.

### **Instructions**

Members of the ballot pool associated with this project may log in and submit their votes from the following page: <https://standards.nerc.net/CurrentBallots.aspx>

### **Recirculation Ballot Process**

The Standards Committee encourages all members of the ballot pool to review the consideration of comments submitted with the initial ballots. In the recirculation ballot, votes are counted by exception only — if a ballot pool member does not submit a revision to that member’s original vote, the vote remains the same as in the first ballot. Members of the ballot pool may:

- Reconsider and change their vote from the first ballot.
- Vote in the second ballot even if they did not vote on the first ballot.
- Take no action if they do not want to change their original vote.

### **Next Steps**

Voting results will be posted and announced after the ballot window closes.

### **Project Background**

Covanta Energy requested an interpretation of the term “appropriate parties” and asked if there is an entity within the interconnection hierarchy that deems parties to be appropriate.

The request and interpretation are posted on the project page:

[http://www.nerc.com/filez/standards/Project2009-09\\_Interpretation\\_CIP-001-1\\_Covanta.html](http://www.nerc.com/filez/standards/Project2009-09_Interpretation_CIP-001-1_Covanta.html)

### **Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance,  
please contact Shaun Streeter at [shaun.streeter@nerc.net](mailto:shaun.streeter@nerc.net) or at 609.452.8060.*

## Standards Announcement Final Ballot Results

Now available at: <https://standards.nerc.net/Ballots.aspx>

### **Project 2009-09: Interpretation of CIP-001-1 for Covanta Energy**

The recirculation ballot for an interpretation of standard CIP-001-1 — Sabotage Reporting Requirement R2 for Covanta Energy ended October 9, 2009.

### **Ballot Results**

Voting statistics are listed below, and the [Ballot Results](#) Web page provides a link to the detailed results:

Quorum: 89.92%

Approval: 68.31%

The ballot pool approved the interpretation. Ballot criteria details are listed at the end of the announcement.

### **Next Steps**

The interpretation will be submitted to the NERC Board of Trustees for approval.

### **Project Background**

Covanta Energy requested an interpretation of the term “appropriate parties” and asked if there is an entity within the interconnection hierarchy that deems parties to be appropriate.

The request and interpretation are posted on the project page:

[http://www.nerc.com/filez/standards/Project2009-09 Interpretation CIP-001-1 Covanta.html](http://www.nerc.com/filez/standards/Project2009-09%20Interpretation%20CIP-001-1%20Covanta.html)

### **Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

### **Ballot Criteria**

Approval requires both a (1) quorum, which is established by at least 75% of the members of the ballot pool for submitting either an affirmative vote, a negative vote, or an abstention, and (2) A two-thirds majority of the weighted segment votes cast must be affirmative; the number of votes cast is the sum of affirmative and negative votes, excluding abstentions and nonresponses. If there are no negative votes with reasons from the first ballot, the results of the first ballot shall stand. If, however, one or more members submit negative votes with reasons, a second ballot shall be conducted.

*For more information or assistance,  
please contact Shaun Streeter at [shaun.streeter@nerc.net](mailto:shaun.streeter@nerc.net) or at 609.452.8060.*

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| <b>Ballot Name:</b>           | Project 2009-09 - Interpretation - Covanta Energy - CIP-001-1_rc |
| <b>Ballot Period:</b>         | 9/29/2009 - 10/9/2009  |
| <b>Ballot Type:</b>           | recirculation  |
| <b>Total # Votes:</b>         | 223  |
| <b>Total Ballot Pool:</b>     | 248  |
| <b>Quorum:</b>                | <b>89.92 % The Quorum has been reached</b>                       |
| <b>Weighted Segment Vote:</b> | 68.31 %  |
| <b>Ballot Results:</b>        | <b>The Standard has Passed</b>                                   |

| Summary of Ballot Results |             |                |             |              |           |              |                 |           |  |
|---------------------------|-------------|----------------|-------------|--------------|-----------|--------------|-----------------|-----------|--|
| Segment                   | Ballot Pool | Segment Weight | Affirmative |              | Negative  |              | Abstain # Votes | No Vote   |  |
|                           |             |                | # Votes     | Fraction     | # Votes   | Fraction     |                 |           |  |
| 1 - Segment 1.            | 67          | 1              | 40          | 0.741        | 14        | 0.259        | 3               | 10        |  |
| 2 - Segment 2.            | 11          | 1              | 4           | 0.4          | 6         | 0.6          | 0               | 1         |  |
| 3 - Segment 3.            | 51          | 1              | 35          | 0.745        | 12        | 0.255        | 1               | 3         |  |
| 4 - Segment 4.            | 14          | 1              | 11          | 0.846        | 2         | 0.154        | 1               | 0         |  |
| 5 - Segment 5.            | 52          | 1              | 33          | 0.688        | 15        | 0.313        | 1               | 3         |  |
| 6 - Segment 6.            | 30          | 1              | 17          | 0.708        | 7         | 0.292        | 1               | 5         |  |
| 7 - Segment 7.            | 0           | 0              | 0           | 0            | 0         | 0            | 0               | 0         |  |
| 8 - Segment 8.            | 9           | 0.9            | 6           | 0.6          | 3         | 0.3          | 0               | 0         |  |
| 9 - Segment 9.            | 5           | 0.2            | 2           | 0.2          | 0         | 0            | 2               | 1         |  |
| 10 - Segment 10.          | 9           | 0.7            | 4           | 0.4          | 3         | 0.3          | 0               | 2         |  |
| <b>Totals</b>             | <b>248</b>  | <b>7.8</b>     | <b>152</b>  | <b>5.328</b> | <b>62</b> | <b>2.473</b> | <b>9</b>        | <b>25</b> |  |

| Individual Ballot Pool Results |   |                   |             |                      |
|--------------------------------|---|-------------------|-------------|----------------------|
| Segment                        | Organization                            | Member            | Ballot      | Comments             |
| 1                              | Ameren Services                         | Kirit S. Shah     | Negative    | <a href="#">View</a> |
| 1                              | American Electric Power                 | Paul B. Johnson   | Affirmative |                      |
| 1                              | American Transmission Company, LLC      | Jason Shaver      | Affirmative |                      |
| 1                              | Associated Electric Cooperative, Inc.   | John Bussman      |             |                      |
| 1                              | Avista Corp.                            | Scott Kinney      | Affirmative |                      |
| 1                              | BC Transmission Corporation             | Gordon Rawlings   | Affirmative |                      |
| 1                              | Bonneville Power Administration         | Donald S. Watkins | Affirmative |                      |
| 1                              | Brazos Electric Power Cooperative, Inc. | Tony Kroskey      | Affirmative |                      |

|   |  |                              |             |                      |
|---|--|------------------------------|-------------|----------------------|
| 1 | CenterPoint Energy   | Paul Rocha                   | Affirmative |                      |
| 1 | Central Maine Power Company  | Brian Conroy                 | Negative    |                      |
| 1 | City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power | Alan L Cooke                 | Abstain     |                      |
| 1 | City Utilities of Springfield, Missouri  | Jeff Knottek                 | Affirmative |                      |
| 1 | Consolidated Edison Co. of New York  | Christopher L de Graffenried | Affirmative |                      |
| 1 | Dominion Virginia Power  | William L. Thompson          | Negative    | <a href="#">View</a> |
| 1 | Duke Energy Carolina   | Douglas E. Hils              | Affirmative |                      |
| 1 | E.ON U.S. LLC  | Larry Monday                 | Negative    | <a href="#">View</a> |
| 1 | East Kentucky Power Coop.  | George S. Carruba            |             |                      |
| 1 | Entergy Corporation  | George R. Bartlett           | Affirmative |                      |
| 1 | Exelon Energy  | John J. Blazekovich          | Negative    | <a href="#">View</a> |
| 1 | Farmington Electric Utility System   | Alan Glazner                 |             |                      |
| 1 | FirstEnergy Energy Delivery  | Robert Martinko              | Affirmative | <a href="#">View</a> |
| 1 | Florida Keys Electric Cooperative Assoc.   | Dennis Minton                |             |                      |
| 1 | Great River Energy   | Gordon Pietsch               | Affirmative |                      |
| 1 | Hoosier Energy Rural Electric Cooperative, Inc.                                  | Damon Holladay               | Affirmative |                      |
| 1 | Hydro One Networks, Inc.   | Ajay Garg                    | Negative    | <a href="#">View</a> |
| 1 | Idaho Power Company  | Ronald D. Schellberg         | Affirmative |                      |
| 1 | ITC Transmission   | Elizabeth Howell             |             |                      |
| 1 | JEA  | Ted E Hobson                 | Negative    | <a href="#">View</a> |
| 1 | Kansas City Power & Light Co.  | Michael Gammon               | Affirmative |                      |
| 1 | Kissimmee Utility Authority  | Joe B Watson                 | Affirmative |                      |
| 1 | Lakeland Electric  | Larry E Watt                 | Negative    | <a href="#">View</a> |
| 1 | Lee County Electric Cooperative  | Rodney Hawkins               |             |                      |
| 1 | Lincoln Electric System  | Doug Bantam                  |             |                      |
| 1 | Long Island Power Authority  | Jonathan Appelbaum           | Affirmative |                      |
| 1 | Manitoba Hydro   | Michelle Rheault             | Affirmative |                      |
| 1 | MEAG Power   | Danny Dees                   | Negative    |                      |
| 1 | MidAmerican Energy Co.   | Terry Harbour                | Affirmative | <a href="#">View</a> |
| 1 | New York Power Authority   | Ralph Ruffano                | Negative    |                      |
| 1 | New York State Electric & Gas Corp.  | Henry G. Masti               |             |                      |
| 1 | Northeast Utilities  | David H. Boguslawski         | Negative    | <a href="#">View</a> |
| 1 | Northern Indiana Public Service Co.  | Kevin M Largura              | Affirmative |                      |
| 1 | Ohio Valley Electric Corp.   | Robert Matthey               | Affirmative |                      |
| 1 | Oklahoma Gas and Electric Co.  | Marvin E VanBebber           | Abstain     |                      |
| 1 | Omaha Public Power District  | Lorees Tadros                |             |                      |
| 1 | Oncor Electric Delivery  | Charles W. Jenkins           | Affirmative |                      |
| 1 | Otter Tail Power Company   | Lawrence R. Larson           | Affirmative |                      |
| 1 | Pacific Gas and Electric Company   | Chifong L. Thomas            |             |                      |
| 1 | PacifiCorp   | Mark Sampson                 | Affirmative |                      |
| 1 | Platte River Power Authority   | John C. Collins              | Affirmative |                      |
| 1 | Potomac Electric Power Co.   | Richard J. Kafka             | Affirmative |                      |
| 1 | PowerSouth Energy Cooperative  | Larry D. Avery               | Affirmative |                      |
| 1 | PP&L, Inc.   | Ray Mammarella               | Negative    | <a href="#">View</a> |
| 1 | Progress Energy Carolinas  | Sammy Roberts                | Affirmative | <a href="#">View</a> |
| 1 | Public Service Electric and Gas Co.  | Kenneth D. Brown             | Affirmative |                      |
| 1 | Puget Sound Energy, Inc.   | Catherine Koch               | Negative    | <a href="#">View</a> |
| 1 | Salt River Project   | Robert Kondziolka            | Affirmative |                      |
| 1 | Santee Cooper  | Terry L. Blackwell           | Affirmative |                      |
| 1 | SaskPower  | Wayne Guttormson             | Abstain     |                      |
| 1 | Seattle City Light   | Pawel Krupa                  | Affirmative |                      |
| 1 | South Texas Electric Cooperative   | Richard McLeon               | Affirmative |                      |
| 1 | Southern California Edison Co.   | Dana Cabbell                 | Affirmative |                      |
| 1 | Southern Company Services, Inc.  | Horace Stephen Williamson    | Affirmative |                      |
| 1 | Southwest Transmission Cooperative, Inc.   | James L. Jones               | Affirmative |                      |
| 1 | Tri-State G & T Association Inc.   | Keith V. Carman              | Affirmative |                      |
| 1 | Westar Energy  | Allen Klassen                | Negative    |                      |
| 1 | Western Area Power Administration  | Brandy A Dunn                | Affirmative |                      |
| 1 | Xcel Energy, Inc.  | Gregory L Pieper             | Affirmative |                      |
| 2 | Alberta Electric System Operator   | Anita Lee                    | Negative    | <a href="#">View</a> |
| 2 | BC Transmission Corporation  | Faramarz Amjadi              | Affirmative |                      |
| 2 | California ISO   | Greg Tillitson               | Negative    | <a href="#">View</a> |
| 2 | Electric Reliability Council of Texas, Inc.                                      | Chuck B Manning              | Affirmative |                      |
| 2 | Independent Electricity System Operator  | Kim Warren                   | Negative    | <a href="#">View</a> |
| 2 | ISO New England, Inc.  | Kathleen Goodman             | Negative    | <a href="#">View</a> |

|   |   |                         |             |                      |
|---|---|-------------------------|-------------|----------------------|
| 2 | Midwest ISO, Inc.                             | Terry Bilke             | Negative    | <a href="#">View</a> |
| 2 | New Brunswick System Operator                 | Alden Briggs            | Negative    | <a href="#">View</a> |
| 2 | New York Independent System Operator          | Gregory Campoli         |             |                      |
| 2 | PJM Interconnection, L.L.C.                   | Tom Bowe                | Affirmative |                      |
| 2 | Southwest Power Pool                          | Charles H Yeung         | Affirmative |                      |
| 3 | Alabama Power Company                         | Bobby Kerley            | Affirmative |                      |
| 3 | Ameren Services                               | Mark Peters             | Negative    |                      |
| 3 | American Electric Power                       | Raj Rana                | Affirmative |                      |
| 3 | Arizona Public Service Co.                    | Thomas R. Glock         | Affirmative |                      |
| 3 | Atlantic City Electric Company                | James V. Petrella       | Affirmative |                      |
| 3 | BC Hydro and Power Authority                  | Pat G. Harrington       | Abstain     |                      |
| 3 | Bonneville Power Administration               | Rebecca Berdahl         |             |                      |
| 3 | Central Lincoln PUD                           | Steve Alexanderson      | Negative    | <a href="#">View</a> |
| 3 | City Public Service of San Antonio            | Edwin Les Barrow        | Negative    | <a href="#">View</a> |
| 3 | Commonwealth Edison Co.                       | Stephen Lesniak         | Negative    |                      |
| 3 | Consolidated Edison Co. of New York           | Peter T Yost            | Affirmative |                      |
| 3 | Consumers Energy                              | David A. Lapinski       | Affirmative |                      |
| 3 | Cowlitz County PUD                            | Russell A Noble         | Affirmative |                      |
| 3 | Delmarva Power & Light Co.                    | Michael R. Mayer        | Affirmative |                      |
| 3 | Detroit Edison Company                        | Kent Kujala             | Affirmative |                      |
| 3 | Dominion Resources, Inc.                      | Jalal (John) Babik      | Negative    | <a href="#">View</a> |
| 3 | Duke Energy Carolina                          | Henry Ernst-Jr          | Affirmative |                      |
| 3 | Entergy Services, Inc.                        | Matt Wolf               | Affirmative |                      |
| 3 | FirstEnergy Solutions                         | Joanne Kathleen Borrell | Affirmative | <a href="#">View</a> |
| 3 | Florida Power Corporation                     | Lee Schuster            | Affirmative | <a href="#">View</a> |
| 3 | Georgia Power Company                         | Leslie Sibert           | Affirmative |                      |
| 3 | Georgia System Operations Corporation         | Edward W. Pourciau      | Negative    |                      |
| 3 | Grays Harbor PUD                              | Wesley W Gray           | Affirmative |                      |
| 3 | Great River Energy                            | Sam Kokkinen            | Affirmative |                      |
| 3 | Gulf Power Company                            | Gwen S Frazier          | Affirmative |                      |
| 3 | Hydro One Networks, Inc.                      | Michael D. Penstone     | Negative    | <a href="#">View</a> |
| 3 | JEA   | Garry Baker             | Negative    | <a href="#">View</a> |
| 3 | Kansas City Power & Light Co.                 | Charles Locke           | Affirmative |                      |
| 3 | Kissimmee Utility Authority                   | Gregory David Woessner  |             |                      |
| 3 | Lakeland Electric                             | Mace Hunter             | Affirmative |                      |
| 3 | Lincoln Electric System                       | Bruce Merrill           | Negative    | <a href="#">View</a> |
| 3 | Louisville Gas and Electric Co.               | Charles A. Freibert     | Negative    | <a href="#">View</a> |
| 3 | Manitoba Hydro                                | Greg C Parent           | Affirmative |                      |
| 3 | Mississippi Power                             | Don Horsley             | Affirmative |                      |
| 3 | New York Power Authority                      | Michael Lupo            | Negative    |                      |
| 3 | Niagara Mohawk (National Grid Company)        | Michael Schiavone       | Affirmative |                      |
| 3 | Northern Indiana Public Service Co.           | William SeDoris         | Negative    |                      |
| 3 | PacifiCorp                                    | John Apperson           | Affirmative |                      |
| 3 | Platte River Power Authority                  | Terry L Baker           | Affirmative |                      |
| 3 | Potomac Electric Power Co.                    | Robert Reuter           | Affirmative |                      |
| 3 | Progress Energy Carolinas                     | Sam Waters              | Affirmative | <a href="#">View</a> |
| 3 | Public Service Electric and Gas Co.           | Jeffrey Mueller         | Affirmative |                      |
| 3 | Public Utility District No. 2 of Grant County | Greg Lange              | Affirmative |                      |
| 3 | Sacramento Municipal Utility District         | Mark Alberter           | Affirmative |                      |
| 3 | Salt River Project                            | John T. Underhill       | Affirmative |                      |
| 3 | Santee Cooper                                 | Zack Dusenbury          | Affirmative |                      |
| 3 | Seattle City Light                            | Dana Wheelock           | Affirmative |                      |
| 3 | Southern California Edison Co.                | David Schiada           | Affirmative |                      |
| 3 | Tampa Electric Co.                            | Ronald L. Donahey       |             |                      |
| 3 | Wisconsin Electric Power Marketing            | James R. Keller         | Affirmative |                      |
| 3 | Xcel Energy, Inc.                             | Michael Ibold           | Affirmative |                      |
| 4 | Alliant Energy Corp. Services, Inc.           | Kenneth Goldsmith       | Affirmative | <a href="#">View</a> |
| 4 | American Municipal Power - Ohio               | Kevin L Holt            | Affirmative |                      |
| 4 | Consumers Energy                              | David Frank Ronk        | Affirmative |                      |
| 4 | Detroit Edison Company                        | Daniel Herring          | Affirmative |                      |
| 4 | Georgia System Operations Corporation         | Guy Andrews             | Negative    |                      |
| 4 | Illinois Municipal Electric Agency            | Bob C. Thomas           | Affirmative | <a href="#">View</a> |
| 4 | Madison Gas and Electric Co.                  | Joseph G. DePoorter     | Affirmative |                      |
| 4 | Northern California Power Agency              | Fred E. Young           | Affirmative |                      |
| 4 | Ohio Edison Company                           | Douglas Hohlbaugh       | Affirmative | <a href="#">View</a> |
| 4 | Old Dominion Electric Coop.                   | Mark Ringhausen         | Abstain     |                      |
| 4 | Public Utility District No. 1 of Snohomish    | John D. Martinsen       | Negative    | <a href="#">View</a> |

|   | County   |                       |             |                      |
|---|--|-----------------------|-------------|----------------------|
| 4 | Seattle City Light                                 | Hao Li                | Affirmative |                      |
| 4 | Seminole Electric Cooperative, Inc.                | Steven R. Wallace     | Affirmative |                      |
| 4 | Wisconsin Energy Corp.                             | Anthony Jankowski     | Affirmative |                      |
| 5 | AEP Service Corp.                                  | Brock Ondayko         | Affirmative |                      |
| 5 | Amerenue   | Sam Dwyer             | Negative    |                      |
| 5 | Avista Corp.                                       | Edward F. Groce       | Affirmative |                      |
| 5 | Bonneville Power Administration                    | Francis J. Halpin     | Affirmative |                      |
| 5 | Buckeye Power, Inc.                                | Kevin Koloini         |             |                      |
| 5 | Calpine Corporation                                | John Brent Hebert     | Affirmative |                      |
| 5 | City of Tallahassee                                | Alan Gale             | Affirmative |                      |
| 5 | Cogentrix Energy, Inc.                             | Tony Halcomb          | Affirmative |                      |
| 5 | Colmac Clarion/Piney Creek LP                      | Harvie D. Beavers     | Affirmative | <a href="#">View</a> |
| 5 | Constellation Power Source Generation, Inc.        | Scott A Etnoyer       | Negative    | <a href="#">View</a> |
| 5 | Consumers Energy                                   | James B Lewis         | Affirmative |                      |
| 5 | Covanta Energy                                     | Samuel Cabassa        | Negative    | <a href="#">View</a> |
| 5 | Detroit Edison Company                             | Ronald W. Bauer       | Affirmative |                      |
| 5 | Dominion Resources, Inc.                           | Mike Garton           | Negative    | <a href="#">View</a> |
| 5 | Dynegy   | Greg Mason            | Negative    |                      |
| 5 | Entergy Corporation                                | Stanley M Jaskot      |             |                      |
| 5 | Exelon Nuclear                                     | Michael Korchynsky    | Negative    |                      |
| 5 | FirstEnergy Solutions                              | Kenneth Dresner       | Affirmative | <a href="#">View</a> |
| 5 | FPL Energy   | Benjamin Church       | Affirmative |                      |
| 5 | Great River Energy                                 | Cynthia E Sulzer      | Affirmative |                      |
| 5 | JEA  | Donald Gilbert        | Negative    | <a href="#">View</a> |
| 5 | Kansas City Power & Light Co.                      | Scott Heidtbrink      | Affirmative |                      |
| 5 | Liberty Electric Power LLC                         | Daniel Duff           | Affirmative |                      |
| 5 | Lincoln Electric System                            | Dennis Florom         | Negative    | <a href="#">View</a> |
| 5 | Louisville Gas and Electric Co.                    | Charlie Martin        | Negative    | <a href="#">View</a> |
| 5 | Lower Colorado River Authority                     | Tom Foreman           | Negative    | <a href="#">View</a> |
| 5 | Luminant Generation Company LLC                    | Mike Laney            | Affirmative |                      |
| 5 | Manitoba Hydro                                     | Mark Aikens           | Affirmative |                      |
| 5 | MidAmerican Energy Co.                             | Christopher Schneider | Abstain     |                      |
| 5 | Northern Indiana Public Service Co.                | Michael K Wilkerson   | Negative    |                      |
| 5 | Northern States Power Co.                          | Liam Noailles         | Affirmative |                      |
| 5 | Oklahoma Gas and Electric Co.                      | Kim Morphis           | Affirmative |                      |
| 5 | Orlando Utilities Commission                       | Richard Kinan         | Affirmative |                      |
| 5 | Pacific Gas and Electric Company                   | Richard J. Padilla    | Affirmative |                      |
| 5 | PacifiCorp Energy                                  | David Godfrey         | Affirmative |                      |
| 5 | Portland General Electric Co.                      | Gary L Tingley        | Affirmative |                      |
| 5 | PowerSouth Energy Cooperative                      | Tim Hattaway          | Negative    |                      |
| 5 | PPL Generation LLC                                 | Mark A. Heimbach      | Negative    | <a href="#">View</a> |
| 5 | Progress Energy Carolinas                          | Wayne Lewis           | Affirmative |                      |
| 5 | PSEG Power LLC                                     | Thomas Piascik        | Affirmative |                      |
| 5 | Reedy Creek Energy Services                        | Bernie Budnik         |             |                      |
| 5 | RRI Energy   | Thomas J. Bradish     | Negative    | <a href="#">View</a> |
| 5 | Sacramento Municipal Utility District              | Damon Smith           | Affirmative |                      |
| 5 | Salt River Project                                 | Glen Reeves           | Affirmative |                      |
| 5 | Seattle City Light                                 | Michael J. Haynes     | Affirmative |                      |
| 5 | Seminole Electric Cooperative, Inc.                | Brenda K. Atkins      | Affirmative |                      |
| 5 | South California Edison Company                    | Ahmad Sanati          | Affirmative |                      |
| 5 | Tenaska, Inc.                                      | Scott M. Helyer       | Negative    |                      |
| 5 | Tri-State G & T Association Inc.                   | Barry Ingold          | Affirmative |                      |
| 5 | U.S. Army Corps of Engineers Northwestern Division | Karl Bryan            | Affirmative |                      |
| 5 | U.S. Bureau of Reclamation                         | Martin Bauer          | Affirmative | <a href="#">View</a> |
| 5 | Wisconsin Electric Power Co.                       | Linda Horn            | Affirmative |                      |
| 6 | AEP Marketing                                      | Edward P. Cox         | Affirmative |                      |
| 6 | Ameren Energy Marketing Co.                        | Jennifer Richardson   |             |                      |
| 6 | Bonneville Power Administration                    | Brenda S. Anderson    | Affirmative |                      |
| 6 | Consolidated Edison Co. of New York                | Nickesha P Carrol     | Affirmative |                      |
| 6 | Constellation Energy Commodities Group             | Chris Lyons           | Abstain     |                      |
| 6 | Dominion Resources, Inc.                           | Louis S Slade         | Negative    | <a href="#">View</a> |
| 6 | Duke Energy Carolina                               | Walter Yeager         | Affirmative |                      |
| 6 | Entergy Services, Inc.                             | Terri F Benoit        |             |                      |
| 6 | Exelon Power Team                                  | Pulin Shah            | Negative    |                      |
| 6 | FirstEnergy Solutions                              | Mark S Travaglianti   | Affirmative | <a href="#">View</a> |

|    |  |                      |             |                      |
|----|--|----------------------|-------------|----------------------|
| 6  | Florida Power & Light Co.                                    | Silvia P Mitchell    |             |                      |
| 6  | Great River Energy   | Donna Stephenson     | Affirmative |                      |
| 6  | Kansas City Power & Light Co.                                | Thomas Saitta        |             |                      |
| 6  | Lincoln Electric System                                      | Eric Ruskamp         | Negative    | <a href="#">View</a> |
| 6  | Louisville Gas and Electric Co.                              | Daryn Barker         | Negative    | <a href="#">View</a> |
| 6  | Luminant Energy  | Thomas Burke         |             |                      |
| 6  | Manitoba Hydro   | Daniel Prowse        | Affirmative |                      |
| 6  | New York Power Authority                                     | Thomas Papadopoulos  | Negative    |                      |
| 6  | Northern Indiana Public Service Co.                          | Joseph O'Brien       | Negative    | <a href="#">View</a> |
| 6  | PacifiCorp   | Gregory D Maxfield   | Affirmative |                      |
| 6  | Progress Energy  | James Eckelkamp      | Affirmative |                      |
| 6  | PSEG Energy Resources & Trade LLC                            | James D. Hebson      | Affirmative |                      |
| 6  | Public Utility District No. 1 of Chelan County               | Hugh A. Owen         | Affirmative |                      |
| 6  | RRI Energy   | Trent Carlson        | Negative    | <a href="#">View</a> |
| 6  | Salt River Project   | Mike Hummel          | Affirmative |                      |
| 6  | Santee Cooper  | Suzanne Ritter       | Affirmative |                      |
| 6  | Seminole Electric Cooperative, Inc.                          | Trudy S. Novak       | Affirmative |                      |
| 6  | Southern California Edison Co.                               | Marcus V Lotto       | Affirmative |                      |
| 6  | Western Area Power Administration - UGP Marketing            | John Stonebarger     | Affirmative |                      |
| 6  | Xcel Energy, Inc.  | David F. Lemmons     | Affirmative |                      |
| 8  | Edward C Stein   | Edward C Stein       | Affirmative |                      |
| 8  | James A Maenner  | James A Maenner      | Affirmative |                      |
| 8  | JDRJC Associates   | Jim D. Cyrulewski    | Negative    | <a href="#">View</a> |
| 8  | Network & Security Technologies                              | Nicholas Lauriat     | Affirmative |                      |
| 8  | Power Energy Group LLC                                       | Peggy Abbadini       | Affirmative |                      |
| 8  | Roger C Zaklukiewicz   | Roger C Zaklukiewicz | Negative    | <a href="#">View</a> |
| 8  | Utility Services LLC   | Brian Evans-Mongeon  | Negative    | <a href="#">View</a> |
| 8  | Volkman Consulting, Inc.                                     | Terry Volkman        | Affirmative |                      |
| 8  | Wally Magda  | Wally Magda          | Affirmative |                      |
| 9  | Commonwealth of Massachusetts Department of Public Utilities | Donald E. Nelson     | Affirmative |                      |
| 9  | Maine Public Utilities Commission                            | Jacob A McDermott    | Abstain     |                      |
| 9  | National Association of Regulatory Utility Commissioners     | Diane J. Barney      | Affirmative |                      |
| 9  | New York State Department of Public Service                  | Thomas G Dvorsky     |             |                      |
| 9  | Oregon Public Utility Commission                             | Jerome Murray        | Abstain     |                      |
| 10 | Electric Reliability Council of Texas, Inc.                  | Kent Saathoff        | Affirmative |                      |
| 10 | Florida Reliability Coordinating Council                     | Linda Campbell       | Negative    | <a href="#">View</a> |
| 10 | Midwest Reliability Organization                             | Dan R Schoenecker    | Affirmative |                      |
| 10 | New York State Reliability Council                           | Alan Adamson         | Negative    |                      |
| 10 | Northeast Power Coordinating Council, Inc.                   | Guy V. Zito          | Negative    | <a href="#">View</a> |
| 10 | ReliabilityFirst Corporation                                 | Jacque Smith         | Affirmative |                      |
| 10 | SERC Reliability Corporation                                 | Carter B Edge        |             |                      |
| 10 | Southwest Power Pool Regional Entity                         | Stacy Dochoda        |             |                      |
| 10 | Western Electricity Coordinating Council                     | Louise McCarren      | Affirmative |                      |

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**Exhibit D**

**Roster of the Interpretation Development Team Standard CIP-001-1 — Sabotage  
Reporting, Requirement R2**

**Request for Interpretation of CIP-001-01 by Covanta Energy  
Drafting Team**

**Project 2009-09**

|                   |   |   |
|-------------------|---|---|
|                   | David L. Norton (Chair)                       | Entergy   |
|                   | Jackie Collett                                | Manitoba Hydro                                  |
|                   | Jeri Domingo Brewer                           | U.S. Bureau of Reclamation                      |
|                   | Gerald Freese                                 | American Electric Power                         |
|                   | John Lim                                      | Con Edison                                      |
|                   | Robert Mathews                                | PG&E  |
|                   | Kevin B. Perry                                | SPP   |
| <b>NERC Staff</b> | Scott Mix — Manager Infrastructure Security   | North American Electric Reliability Corporation |
| <b>NERC Staff</b> | Harry Tom — Standards Development Coordinator | North American Electric Reliability Corporation |