

Project 2009-01 Disturbance and Sabotage Reporting Mapping Document

Translation of CIP-002-2a – Sabotage Reporting, EOP-004-1 – Disturbance Reporting and CIP-008-4 – Cyber Security – Incident Reporting and Response Planning (R 1.3), into EOP-004-2 – Impact Event and Disturbance Assessment, Analysis, and Reporting

Standard: CIP-001-2a – Sabotage Reporting		
Requirement in Approved Standard	Translation to New Standard or Other Action	Proposed Language in EOP-004-2 - Impact Event and Disturbance Assessment, Analysis, and Reporting
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.	Moved into EOP-004-2, R1	<p>R1. Each Responsible Entity shall have an Operating Plan that includes: <i>[Violation Risk Factor: Lower] [Time Horizon: Operations Planning]</i></p> <ol style="list-style-type: none"> 1.1. A process for identifying events listed in Attachment 1. 1.2. A process for gathering information for Attachment 2 regarding events listed in Attachment 1. 1.3. A process for communicating events listed in Attachment 1 to the Electric Reliability Organization, the Responsible Entity’s Reliability Coordinator and the following as appropriate: <ul style="list-style-type: none"> • Internal company personnel • The Responsible Entities’ Regional Entity

		<ul style="list-style-type: none"> • Law enforcement • Governmental or provincial agencies <p>1.4. Provision(s) for updating the Operating Plan within 90 calendar days of any change in assets, personnel, other circumstances that may no longer align with the plan or incorporating lessons learned pursuant to Requirement R3.</p> <p>1.5. Process for ensuring the responsible entity reviews the Operating Plan at least annually (once each calendar year) with no more than 15 months between reviews.</p>
<p>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.</p>	<p>Moved into EOP-004-2, R1</p>	<p>R1. Each Responsible Entity shall have an Operating Plan that includes: [Violation Risk: Factor: Lower] [Time Horizon: Operations Planning]</p> <ul style="list-style-type: none"> 1.1. A process for identifying events listed in Attachment 1. 1.2. A process for gathering information for Attachment 2 regarding events listed in Attachment 1. 1.3. A process for communicating events listed in Attachment 1 that includes the Electric Reliability Organization, the Responsible Entity’s Reliability Coordinator and the following as appropriate: <ul style="list-style-type: none"> • Internal company personnel

		<ul style="list-style-type: none"> • The Responsible Entities’ Regional Entity • Law enforcement • Governmental or provincial agencies <p>1.4. Provision(s) for updating the Operating Plan within 90 calendar days of any change in assets, personnel, other circumstances that may no longer align with the plan or incorporating lessons learned pursuant to R3.</p> <p>1.5. Process for ensuring the responsible entity reviews the Operating Plan at least annually (once each calendar year) with no more than 15 months between reviews.</p>
<p>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.</p>	<p>Moved into EOP-004-2, R1</p>	<p>R1. Each Responsible Entity shall have an Operating Plan that includes: [Violation Risk: Factor: Lower] [Time Horizon: Operations Planning]</p> <ul style="list-style-type: none"> 1.1. A process for identifying events listed in Attachment 1. 1.2. A process for gathering information for Attachment 2 regarding events listed in Attachment 1. 1.3. A process for communicating events listed in Attachment 1 that includes the Electric Reliability Organization, the Responsible Entity’s Reliability Coordinator and the following as appropriate: <ul style="list-style-type: none"> • Internal company personnel

		<ul style="list-style-type: none"> • Responsible Entities’ Regional Entity • Law enforcement • Governmental or provincial agencies <p>1.4. Provision(s) for updating the Operating Plan within 90 calendar days of any change in assets, personnel, other circumstances that may no longer align with the plan or incorporating lessons learned pursuant to R3.</p> <p>1.5. Process for ensuring the responsible entity reviews the Operating Plan at least annually (once each calendar year) with no more than 15 months between reviews.</p>
<p>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.</p>	<p>Moved into EOP-004-2, R1</p>	<p>R1. Each Responsible Entity shall have an Operating Plan that includes: [Violation Risk: Factor: Lower] [Time Horizon: Operations Planning]</p> <p>1.1. A process for identifying events listed in Attachment 1.</p> <p>1.2. A process for gathering information for Attachment 2 regarding events listed in Attachment 1.</p> <p>1.3. A process for communicating events listed in Attachment 1 that includes the Electric Reliability Organization, the Responsible Entity’s Reliability Coordinator and the following as appropriate:</p> <ul style="list-style-type: none"> • Internal company personnel

		<ul style="list-style-type: none"> • Responsible Entities’ Regional Entity • Law enforcement • Governmental or provincial agencies <p>1.4. Provision(s) for updating the Operating Plan within 90 calendar days of any change in assets, personnel, other circumstances that may no longer align with the plan or incorporating lessons learned pursuant to R3.</p> <p>1.5. Process for ensuring the responsible entity reviews the Operating Plan at least annually (once each calendar year) with no more than 15 months between reviews.</p>
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Standard: EOP-004-1 – Disturbance Reporting		
Requirement in Approved Standard	Translation to New Standard or Other Action	Proposed Language in EOP-004-2 - Impact Event and Disturbance Assessment, Analysis, and Reporting Comments
R1. Each Regional Reliability Organization shall establish and maintain a Regional reporting procedure to facilitate preparation of preliminary and final disturbance reports.	Retire this fill-in-the-blank requirement. Replace with new reporting and analysis procedure developed by NERC EAWG.	The requirements of EOP-004-2 specify that an entity must report certain types of impact events. The NERC EAWG is developing continent wide reporting and analysis guidelines applicable under the NERC Rules of Procedure.
R2. A Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load-Serving Entity shall promptly analyze Bulk Electric System disturbances on its system or facilities.	Translated into EOP-004-2, R1 and the NERC Events Analysis Process	The requirements of EOP-004-2 specify that an entity must report certain types of impact events. The NERC EAWG is developing continent wide reporting and analysis guidelines applicable under the NERC Rules of Procedure.
R3. A Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load-Serving Entity experiencing a reportable incident shall provide a preliminary written report to its Regional Reliability Organization and NERC.	Translated into EOP-004-2, R3	R3. Each Responsible Entity shall report impact events in accordance with the Operating Plan developed to address events listed in Attachment 1. <i>[Violation Risk: Factor: Lower] [Time Horizon: Operations Assessment]</i> .

<p>R3.1. The affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load-Serving Entity shall submit within 24 hours of the disturbance or unusual occurrence either a copy of the report submitted to DOE, or, if no DOE report is required, a copy of the NERC Interconnection Reliability Operating Limit and Preliminary Disturbance Report form. Events that are not identified until sometime after they occur shall be reported within 24 hours of being recognized.</p>	<p>Translated into EOP-004-2, R3</p>	<p>R3. Each Responsible Entity shall report impact events in accordance with the Operating Plan developed to address events listed in Attachment 1. <i>[Violation Risk: Factor: Lower] [Time Horizon: Operations Assessment].</i></p>
<p>R3.2. Applicable reporting forms are provided in Attachments 022-1 and 022-2.</p>	<p>Retire – informational statement</p>	

<p>R3.3. Under certain adverse conditions, e.g., severe weather, it may not be possible to assess the damage caused by a disturbance and issue a written Interconnection Reliability Operating Limit and Preliminary Disturbance Report within 24 hours. In such cases, the affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load-Serving Entity shall promptly notify its Regional Reliability Organization(s) and NERC, and verbally provide as much information as is available at that time. The affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load-Serving Entity shall then provide timely, periodic verbal updates until adequate information is available to issue a written Preliminary Disturbance Report.</p>	<p>Retire as a requirement. Added as a "Note" to EOP-004-Attachment1-Impact Events Table</p>	<p>NOTE: Under certain adverse conditions (e.g. severe weather, multiple events) it may not be possible to report the damage caused by an event and issue a written Event Report within the timing in the table below. In such cases, the affected Responsible Entity shall notify parties per R1 and provide as much information as is available at the time of the notification. The affected Responsible Entity shall provide periodic verbal updates until adequate information is available to issue a written Event report. Reports to the ERO should be submitted to one of the following: e-mail: esisac@nerc.com, Facsimile: 609-452-9550, Voice: 609-452-1422.</p>
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<p>R3.4. If, in the judgment of the Regional Reliability Organization, after consultation with the Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load-Serving Entity in which a disturbance occurred, a final report is required, the affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load-Serving Entity shall prepare this report within 60 days. As a minimum, the final report shall have a discussion of the events and its cause, the conclusions reached, and recommendations to prevent recurrence of this type of event. The report shall be subject to Regional Reliability Organization approval.</p>	<p>Retire this fill-in-the-blank requirement.</p> <p>Replace with new reporting procedure developed by NERC EAWG.</p>	<p>The requirements of EOP-004-2 specify that an entity must report certain types of impact events. The NERC EAWG is developing continent wide reporting and analysis guidelines applicable under the NERC Rules of Procedure.</p>
<p>R4. When a Bulk Electric System disturbance occurs, the Regional Reliability Organization shall make its representatives on the NERC Operating Committee and Disturbance Analysis Working Group available to the affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load-Serving Entity immediately affected by the disturbance for the purpose of providing any needed assistance in the investigation and to assist in the preparation of a final report.</p>	<p>Retire this fill-in-the-blank requirement.</p> <p>Replace with new reporting procedure developed by NERC EAWG.</p>	<p>The requirements of EOP-004-2 specify that an entity must report certain types of impact events. The NERC EAWG is developing continent wide reporting and analysis guidelines applicable under the NERC Rules of Procedure.</p>

<p>R5. The Regional Reliability Organization shall track and review the status of all final report recommendations at least twice each year to ensure they are being acted upon in a timely manner. If any recommendation has not been acted on within two years, or if Regional Reliability Organization tracking and review indicates at any time that any recommendation is not being acted on with sufficient diligence, the Regional Reliability Organization shall notify the NERC Planning Committee and Operating Committee of the status of the recommendation(s) and the steps the Regional Reliability Organization has taken to accelerate implementation.</p>	<p>Retire this fill-in-the-blank requirement.</p> <p>Replace with new reporting procedure developed by NERC EAWG.</p>	<p>The requirements of EOP-004-2 specify that an entity must report certain types of impact events. The NERC EAWG is developing continent wide reporting and analysis guidelines applicable under the NERC Rules of Procedure.</p>
<p>Request for Interpretation of CIP-001-2a, R2: Please clarify what is meant by the term, “appropriate parties.” Moreover, who within the Interconnection hierarchy deems parties to be appropriate?</p>	<p>Retire the interpretation</p>	<p>Addressed in EOP-004-2, R1 by replacing the term, ‘appropriate parties’ with a broader, more specific list of specific entities to contact in Part 1.3.</p>

Standard: CIP-008-4 – Cyber Security – Incident Reporting and Response Planning		
Requirement in Approved Standard	Translation to New Standard or Other Action	Proposed Language in EOP-004-2 - Impact Event and Disturbance Assessment, Analysis, and Reporting Comments
R1.3. Process for reporting Cyber Security Incidents to the Electricity Sector Information Sharing and Analysis Center (ES-ISAC). The Responsible Entity must ensure that all reportable Cyber Security Incidents are reported to the ES-ISAC either directly or through an intermediary.	Translated into EOP-004-2 Requirement 1, Part 1.3 and Attachment 1.	<p>Cyber Security Incidents are defined as:</p> <p>Any malicious act or suspicious event that:</p> <ul style="list-style-type: none"> • Compromises, or was an attempt to compromise, the Electronic Security Perimeter or Physical Security Perimeter of a Critical Cyber Asset, or, • Disrupts, or was an attempt to disrupt, the operation of a Critical Cyber Asset. <p>Such events are listed in Attachment 1 as “Detection of a reportable Cyber Security Incident” and are events that are required to be reported under Reliability Standard EOP-004-2. Requirement R1, Part 1.3 requires the Responsible Entity to have “A process for communicating events listed in Attachment 1 to the Electric Reliability Organization,…” The note at the top of Attachment 1 includes the following:</p> <p>“Reports to the ERO should be submitted to one of the following: e-mail: esisac@nerc.com, Facsimile: 609-452-9550, Voice: 609-452-1422.”</p>