



May 6, 2010

**VIA ELECTRONIC FILING**

Kirsten Walli, Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street  
Toronto, Ontario, Canada  
M4P 1E4

Re: *North American Electric Reliability Corporation*

Dear Ms. Walli:

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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**BEFORE THE  
ONTARIO ENERGY BOARD  
OF THE PROVINCE OF ONTARIO**

**NORTH AMERICAN ELECTRIC )  
RELIABILITY CORPORATION )**

**PETITION OF THE  
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION  
FOR APPROVAL OF INTERPRETATION TO RELIABILITY STANDARD CIP-  
001-1 — CYBER SECURITY — SABOTAGE REPORTING, REQUIREMENT R2**

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David N. Cook  
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May 6, 2010

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

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President and Chief Executive Officer  
David N. Cook  
Vice President and General Counsel  
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/s/ Holly A. Hawkins  
Rebecca J. Michael  
Assistant General Counsel  
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

Requirement Number and Text of Requirement
<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>
Question
<p>Please clarify what is meant by the term, “appropriate parties.” Moreover, who within the Interconnection hierarchy deems parties to be appropriate?</p>
Response
<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.
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#### 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**

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

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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**

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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  Interpretation (2)  Request for Interpretation (1)	Recirculation Ballot <a href="#">Info&gt;&gt; (8)</a>   <a href="#">Vote&gt;&gt;</a>	09/29/09 - 10/09/09 (closed)	<a href="#">Summary&gt;&gt; (9)</a> <a href="#">Full Record&gt;&gt; (10)</a>	
	Initial Ballot <a href="#">Info&gt;&gt; (4)</a>   <a href="#">Vote&gt;&gt;</a>	08/06/09 - 08/17/09 (closed)	<a href="#">Summary&gt;&gt; (5)</a> <a href="#">Full Record&gt;&gt; (6)</a>	<a href="#">Consideration of Comments&gt;&gt; (7)</a>
	Pre-ballot Review <a href="#">Info&gt;&gt; (3)</a>   <a href="#">Join&gt;&gt;</a>	07/06/09 - 08/06/09 (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>	January 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>	

**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  
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## 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**

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 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>

### **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 Florum	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 Kathleen Borrell</p>	<p>FirstEnergy 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 required 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	<p>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.</p>
Trent Carlson	RRI Energy	6	Negative	<p>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</p>

Voter	Entity	Segment	Vote	Comment
				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><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	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.

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
				<p>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>
<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	<p>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>
<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	<p>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>
<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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Ballot Results	
<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