

Standard Authorization Request Form

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Texas RE to Complete

SAR No: 008

Title of Proposed Standard	CIP-001-1 Sabotage Reporting – ERCOT Regional Variance
Request Date	5/5/2010

SAR Requester Information	SAR Type (Check a box for each one that applies.)	
Name Bandera Electric Cooperative, Inc.	<input type="checkbox"/>	New Standard
Primary Contact Brian Bartos	<input type="checkbox"/>	Revision to existing Standard
	<input type="checkbox"/>	Revision to the Standard Development Process
Telephone 830-796-6074	<input type="checkbox"/>	Withdrawal of existing Standard
Fax	<input checked="" type="checkbox"/>	Variance to a NERC Standard (Indicate which one) – CIP-001-1
E-mail b.bartos@banderaelectric.com	<input checked="" type="checkbox"/>	Urgent Action

Justification for Urgent Action

The Texas RE RSC is asked to designate this SAR-008 as requiring urgent action, pursuant to Section V of Appendix B to the Texas RE Standards Development Process, because a delay in implementing the proposed variance could materially impact the reliability of the BPS. In particular, the proposed variance will close a critical reliability gap by ensuring that all TO and GO personnel who work in and around BPS facilities (and related facilities) will be covered by procedures, arrangements and training for recognizing and communicating sabotage events. In some cases, TO and GO personnel are the only people who are physically present and in a position to detect vandalism, theft or damage to property associated with some of the bulk power system's transmission and generation facilities. The draft variance CIP-001-1 is attached for consideration by the RSC.

Urgent Action Process

If the RSC designates this requested variance for urgent action, the draft variance will be immediately posted for a 30-day pre-ballot review, and a ballot will be conducted after the review period. There will be no formal comment process. If the ballot passes, the variance will go through the normal approval process, requiring approval by the Texas RE BOD, NERC and FERC. The regional variance for CIP-001-1 will be effective for one year after the date it is approved by FERC. The urgent standard may be renewed, based on consideration of whether progress is being made to implement a permanent replacement standard using the normal process, which may be a regional standard or a national standard. In this case, the national standard being developed in Project 2009-01, Disturbance and Sabotage Reporting, is expected to replace this urgent regional variance.

Purpose (Describe what the standard action will achieve in support of bulk power system reliability.)

This proposed variance to NERC Standard CIP-001-1 - Sabotage Reporting, will address a reliability gap by adding TO and GO to the types of functional entities that this standard applies to. As presently written, the CIP-001-1 standard does not apply to TO and GO entities, which often construct and maintain electrical facilities that are material to the reliability of the bulk power system. This proposal will ensure that all entities who have physical access and control over transmission and generation facilities are included in the applicability of CIP-001.

Note also that the references to the Royal Canadian Mounted Police are removed from R4 and M4 in the regional variance, because the variance only applies in Texas.

Industry Need (Provide a justification for the development or revision of the standard, including an assessment of the reliability and market interface impacts of implementing or not implementing the standard action.)

Texas RE has identified a reliability gap in the application of CIP-001-1 in the ERCOT region because the Requirements of that standard do not presently apply to several functional entities that have physical access to and control over electrical facilities that may be subject to sabotage. Some Transmission Owners and Generator Owners in the ERCOT region have executed JRO/CFR agreements that address some but not all of this reliability gap. The addition of all TO and GO entities to the applicability of the CIP-001-1 Requirements will close the reliability gap by ensuring that all entities with physical control over electrical facilities will prepare for and respond appropriately to sabotage events, without unduly burdening any party.

In the absence of this proposed revision, there is no requirement that all TO and GO entities, whose personnel may be the only workers likely to detect evidence of sabotage at some electrical facilities, must have procedures for recognizing and communicating sabotage events. There is also no present requirement for providing those personnel with sabotage response guidelines.

At the national level, NERC Project 2009-01, Disturbance and Sabotage Reporting, entails revisions to CIP-001-01 and EOP-004-1 (Disturbance Reporting), including enlarging the applicability of the standard to include TO and GO entities. TRE is proposing this regional variance in order to close the identified reliability gap in the ERCOT region on a faster timeline than can be achieved by waiting for the conclusion of the NERC Project. The regional variance for CIP-001-1 will be withdrawn when a permanent standard becomes effective that covers this reliability gap.

There is no market interface impact associated with the proposed revision.

Brief Description (Provide a paragraph that describes the scope of this standard action.)

This proposed regional variance would simply make the requirements of CIP-001-1 applicable to all TO and GO functional entities.

Detailed Description (Provide a description of the proposed project with sufficient details for the standard drafting team to execute the SAR.)

This proposed regional variance would simply make the requirements of CIP-001-1 applicable to all TO and GO functional entities.

Reliability Functions

For a more detailed description of the Reliability Functions, please refer to NERC's Reliability Functional Model.

The Standard will Apply to the Following Functions (Check box for each one that applies.)	
<input checked="" type="checkbox"/> Transmission Owner	<input type="checkbox"/> Transmission Service Provider
<input checked="" type="checkbox"/> Generator Owner	<input checked="" type="checkbox"/> Generator Operator
<input checked="" type="checkbox"/> Balancing Authority	<input type="checkbox"/> Interchange Authority
<input checked="" type="checkbox"/> Reliability Coordinator	<input type="checkbox"/> Purchasing-Selling Entity
<input type="checkbox"/> Resource Planner	<input checked="" type="checkbox"/> Load-Serving Entity
<input type="checkbox"/> Distribution Provider	<input type="checkbox"/> Planning Coordinator
<input type="checkbox"/> Transmission Planner	<input checked="" type="checkbox"/> Transmission Operator

Reliability and Market Interface Principles

Applicable Reliability Principles (Check box for all that apply.)	
<input type="checkbox"/>	1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
<input type="checkbox"/>	2. The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.
<input type="checkbox"/>	3. Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.

<input type="checkbox"/>	4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained and implemented.
<input type="checkbox"/>	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems.
<input type="checkbox"/>	6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.
<input type="checkbox"/>	7. The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis.
<input checked="" type="checkbox"/>	8. Bulk power systems shall be protected from malicious physical or cyber attacks.
Does the proposed Standard comply with all of the following Market Interface Principles? <i>(Select 'yes' or 'no' from the drop-down box.)</i>	
1. A reliability standard shall not give any market participant an unfair competitive advantage. Yes	
2. A reliability standard shall neither mandate nor prohibit any specific market structure. Yes	
3. A reliability standard shall not preclude market solutions to achieving compliance with that standard. Yes	
4. A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards. Yes	

Related Standards

Standard No.	Explanation
CIP-001-1	Standard to which this is a variance.

Related SARs

SAR ID	Explanation
Texas RE SAR-004	This SAR had a similar objective but was not approved by the RSC in 2008.
NERC Project 2009-01	Proposes revisions to CIP-001-1 and EOP-004-1, including expansion of applicability to TO and GO functions.