

**Comparison between NERC CIP-001-1 and Alberta CIP-001-AB-1
Sabotage Reporting**

Section	NERC CIP-001-1	Alberta CIP-001-AB-1	Reason for Difference ¹
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.	Disturbances or unusual occurrences, suspected or determined to be caused by sabotage, shall be reported to the appropriate systems, governmental agencies, and regulatory bodies. <u>The purpose of this reliability standard is to ensure that sabotage events are appropriately reported.</u> to the appropriate systems, governmental agencies, and regulatory bodies	
Applicability	4.1. Reliability Coordinators. 4.2. Balancing Authorities. 4.3. Transmission Operators. 4.4. Generator Operators. 4.5. Load Serving Entities.	<u>This reliability standard applies to:</u> 4.1. Reliability Coordinators. • 4.2. Balancing Authorities. <u>ISO</u> • 4.3. Transmission Operators. <u>TFOs</u> • 4.4. Generator Operators. <u>GFOs</u> • 4.5. Load Serving Entities. <u>WOsire owners, except WOsire owners that only operate facilities below 25 kV</u> <u>In this reliability standard, the term "responsible entity" means all those that are listed above.</u>	
Effective Date	January 1, 2007	January 1, 2007 <u>Ninety (90) calendar days after the date of approval by the Commission.</u>	Time needed to develop required procedures.

¹ The following revisions have been made throughout this proposed reliability standard:

- Identified the responsible entities in Alberta.
- Applied a consistent writing style and added clarity.
- Changed passive terms such as "shall" to "must".
- Developed measures specific to the requirements.

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Definitions		Italicized terms used in this reliability standard have the same meanings as set out in the Alberta Reliability Standards Glossary of Terms and Part 1 of the ISO Rules. ²	Added definitions section to the Alberta reliability standard.
Requirement	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.	<p>R1 Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for responsible entity must document and implement procedures for:</p> <p>R1.1 The recognition of Recognizing sabotage events on its facilities.</p> <p>R1.2 Receiving information about and multi-site sabotage events affecting larger portions of the Interconnection from:</p> <ul style="list-style-type: none"> • the ISO • the local municipal police service, if applicable • the Royal Canadian Mounted Police • the Alberta Security and Strategic Intelligence Support Team (ASSIST) 	<p>Alberta variance³: Recognition of sabotage events on the Interconnection by each responsible entity was modified to receiving information about sabotage events on the Interconnection as it is impractical for responsible entities to recognize sabotage events affecting larger portions of the Interconnection.</p> <p>Revised to align with NERC CIP v2 standards wording.</p> <p>Removed term “multi-site” to address comments received as part of broad consultation. This term led to confusion and did not significantly change the intent of the requirement.</p> <p>Identified specific parties from which to receive information to reduce ambiguity.</p>

² Defined terms are not italicized in this document, but will appear in the Alberta Reliability Standards document.

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		<p>R1.3 Making their <u>its</u> operating personnel aware of sabotage events on its facilities and <u>multi-site</u> sabotage <u>events</u> affecting <u>larger portions</u> of the Interconnection.</p>	
Measure	<p>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</p>	<p>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 MR1 Measures for this requirement are identified in the subsections below.</p> <p>MR1.1 <u>Written procedures exist, content is complete and meets the requirement R1.1. Evidence exists that the procedures specified in requirement R1.1 were implemented upon an occurrence of a sabotage event.</u></p> <p>MR1.2 <u>Written procedures exist, content is complete and meets requirement R1.2. Evidence exists that the procedures specified in requirement R1.2 were implemented upon an occurrence of a sabotage event.</u></p>	

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		<p><u>MR1.3</u> Written procedures exist, content is complete and meets requirement R1.3. Evidence exists that the procedures specified in requirement R1.3 were implemented upon an occurrence of a sabotage event.</p>	
Requirement	<p>R2. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.</p>	<p>R2 <u>Each responsible entity must develop document and implement procedures for 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 communicating information concerning sabotage events to the SC in accordance with ISO OPP 808 – sabotage reporting.</u></p>	<p>Revised to account for Alberta specific approach to communicating sabotage event information.</p> <p><u>Revised to require reporting to AESO SC to reduce ambiguity associated with term "appropriate parties" and to address comments received as part of broad consultation.</u></p>

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Measure	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.	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. MR2 <u>Written procedures exist, content is complete and meets the requirements of R2. Evidence exists that the procedures specified in requirement R2 were implemented upon an occurrence of a sabotage event.</u>	
Requirement	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.	R3 Each <u>responsible entity must annually</u> Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall provide its operating personnel with sabotage <u>event response guidelinesprocedures</u> , including personnel to contact, for reporting disturbances due to sabotage events.	
Measure	M2. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have and provide upon request the procedures	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	

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	or guidelines that will be used to confirm that it meets Requirements 2 and 3.	meets Requirements 2 and 3. MR3 <u>Written procedures exist, content is complete and meets the requirements of R3. Records indicate that operating personnel were provided with the sabotage event response procedures and related contact information within the previous 12 months.</u>	
	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.	R4 <u>Each responsible entity must:</u> R4.1 : <u>Document sabotage event reporting procedures that identify current communications contacts with the following:</u> <ul style="list-style-type: none"> • <u>the local municipal police service, if applicable;</u> • <u>the Royal Canadian Mounted Police;</u> • <u>the Alberta Security and Strategic Intelligence Support Team (ASSIST);</u> R4.2 <u>Implement such the procedures as identified in requirement R4.1 upon the occurrence of a sabotage event.</u> Each responsible entity must develop document and implement appropriate Each develop sabotage event reporting	Added other contacts to requirement R4 as appropriate for Alberta. Alberta variance⁴: Emphasis changed from establishing contacts with appropriate authorities to having procedures that contain contact information for the appropriate authority. It is not practical to hold Alberta entities solely responsible for a bilateral relationship. (See NERC guidance.) <u>Separated the actions of documenting and implementing procedures to clarify the requirement to address comments received as part of broad consultation.</u>

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		<p>procedures as appropriate to their circumstances, that document identify current establish communications contacts with:</p> <p>The local municipal police service, if applicable.</p> <p>The Royal Canadian Mounted Police.</p> <p>The Alberta Security and Strategic Intelligence Support Team (ASSIST), as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials and</p>	
Measure	<p>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).</p>	<p>MR4 <u>Measures for this requirement are identified in the subsections below.</u></p> <p>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</p>	

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		<p>(Requirement 4). MR4.1 <u>Written procedures exist, content is complete and meets the requirements of R4.1. Records indicate that the contact information was verified within the previous 12 months.</u></p> <p>MR4.2 <u>Evidence exists that indicates procedures specified in requirement R4.1 were implemented upon an occurrence of a sabotage event.</u></p>	
Procedures	None identified	None identified	
Compliance	To view the compliance section D of the NERC reliability standard follow this link: http://www.nerc.com/files/CIP-001-1.pdf		<p>There is no compliance section currently proposed in the Alberta Reliability Standards.</p> <p>A compliance program will be developed at a later date for Alberta Reliability Standards that recognizes the compliance monitoring and enforcement structure in Alberta.</p> <p>This approach is deemed consistent with the existing ISO Rules.</p>
Regional Differences	None indicated.		Not applicable in Alberta



Proposed Terms for the ARS Glossary:

“sabotage event” means an occurrence or resulting circumstance that a responsible entity suspects or determines to have been deliberately caused, and results in, or could result in, adverse effects upon the function or operation of any of the following:

- one or more generating units;
- one or more transmission facilities;
- one or more electric distribution systems;
- the operational, telecommunication, or control devices associated with one or more generating units, transmission facilities, or electric distribution systems.

“electric distribution system” has the same meaning as given in the Act.

Defined Terms Used in this Standard:

(As included in the ISO Rules Definitions or Alberta Reliability Standards Glossary)

- Independent System Operator (ISO)
- transmission facility owner (TFO)
- generation facility owner (GFO)
- reliability standard
- system controller (SC)
- wire owner
- Interconnection
- facilities
- Commission
- day