

Purpose

Provides guidelines to summarize and clarify the assignments for reporting significant events to the Department of Energy (DOE), the North American Electric Reliability Corporation (NERC), and the Western Electricity Coordinating Council (WECC).

Background

DOE, WECC, and NERC require certain mandatory reports for electric emergency incidents and disturbances in the United States.

DOE requires that the Electric Utility that operates a Balancing Area and/or Reliability Coordinators and other Electric Utilities report incidents using DOE Form OE-417, "Electric Emergency Incident and Disturbance Report".

NERC Standard EOP-004-4, "Event Reporting", requires that Reliability Coordinators, Balancing Authorities, Transmission Operators, Transmission Owners, Generator Operators, Generator Owners and Distribution Providers shall file the required reports to NERC and other organizations such as WECC, the Reliability Coordinator, law enforcement, or governmental authority. Reporting requirements are met by filing a DOE Form OE-417, report or the NERC Event Reporting Form.

The shorter version of the DOE OE-417 form to aid in filing urgent 1-hour and 6-hour reports was developed and is located at this link: <u>Short DOE OE-417</u>.

The table of reportable events is listed within this procedure and each corresponding type of event references the organization that should report the incident, additional guidance, and clarification of responsibilities.

General Principles

In general, the organization that operates an asset should report operational incidents; whereas, the organization that owns the asset should report physical damage (e.g., the California ISO (CAISO) is probably best suited to report transmission events, especially those across multiple service territories; whereas utilities are best suited to report damage or destruction of transmission equipment, etc.).

To the extent that time allows, collaborate, especially when multiple organizations have critical data and information about an incident. Error on the side of over-reporting. The DOE does allow submittals by several organizations for a single incident.



Reporting Responsibility

As the Balancing Authority, the CAISO Manager of Real-Time Operations must be notified of all events that may meet the reporting criteria listed in the following tables.

In general, the reporting responsibility belongs to the organization identified in the tables below. Where multiple organizations have pertinent data or information or where responsibility is unclear, the Manager of Real-Time Operations or managers from the respective organizations shall contact one another to reach agreement on who submits reporting.

After evaluating each event, the CAISO may determine that a report is necessary and file one even if the responsible reporting entity decides not to file a report.

When an entity, other than the CAISO, submits an OE-417 or EOP-004 report, send a copy to the Operations Compliance mailbox at <u>OperationsCompliance@caiso.com</u>.

Note: For the purpose of meeting the requirements under EOP-004-4 R2, the CAISO Director of Operational Readiness is the primary point of contact.

Under certain adverse conditions (e.g., severe weather, multiple events), it may not be possible to report the damage caused by an event and issue a written Event Report within the timing in the NERC EOP-004-4 standard. In such cases, the affected entity shall notify the parties that require notification via phone or other methods to provide as much information as is available until such time that a written report can be filed.

NERC will accept the DOE OE-417 form, in lieu of the NERC Event Reporting form, if the entity is required to submit an OE-417 report. If an OE-417 report is filed, WECC and NERC must receive a copy of the reports at the time of filing.

Events that Require DOE OE-417 Report

Refer to the following table for events and requirements.



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DOE, NERC and WECC Significant Event Reporting Requirements

	DOE OE-417 Incident (per current <u>OE-417</u> form)	Reporting Responsibility By Contract (NERC function)	Notes		
	Note: Boxes 1 – 9 below, if any of these scenarios apply the DOE OE-417 form, must be <u>filed within one (1) hour</u> of the incident:				
1)	Physical attack that causes major interruptions or impacts to critical infrastructure facilities or to operations.	 ☑ CAISO ☑ PTO (TOP) ☑ UDC/ MSS/ LSE (DP) □ SC/ PG OWNER (GO/GOP) 	Reported by organization physically attacked. For attacks impacting multiple organizations, each attacked/infected system ow ner shall submit report. Note: EOP-004 applicability RC, BA, TOP		
2)	Reportable Cyber Security Incident.	⊠ CAISO ⊠ PTO (TOP) ⊠ UDC/ MSS/ LSE (DP) ⊠ SC/ PG OWNER (GO/GOP)	 NERC definition of reportable Cyber Security Incident states the following. A malicious act or suspicious event that: For a high or medium impact to the BES Cyber System, compromises or attempts to compromise (1) an Electronic Security Perimeter, (2) a Physical Security Perimeter, or (3) an Electronic Access Control or Monitoring System; or Disrupts or attempts to disrupt the operation of a BES Cyber System. Reported by attacked/infected systems ow ner. For attacks impacting multiple organizations, each attacked/infected system ow ner shall submit report. 		
3)	Cyber event that is <u>not</u> a Reportable Cyber Security Incident that causes interruptions of electrical system operations.	⊠ CAISO ⊠ PTO (TOP) ⊠ UDC/ MSS/ LSE (DP) ⊠ SC/ PG OWNER (GO/GOP)	Reported by attacked/infected systems ow ner. For attacks impacting multiple organizations, each attacked/infected system ow ner shall submit report.		
4)	Complete operational failure or shutdow n of the transmission and/or distribution electrical system.	 ☑ CAISO ☑ PTO (TOP) ☑ UDC/ MSS/ LSE (DP) □ SC/ PG OWNER (GO/GOP) 	CAISO will report Transmission Failure/Shutdown in collaboration with Transmission Operator. Any Distribution Failure/Shutdown reported by UDC/MSS.		
5)	Electrical System Separation (Islanding) where part or parts of a power grid remain(s) operational in an otherwise blacked out area or within the partial failure of an integrated electrical system.	 ☑ CAISO □ PTO (TOP) ☑ UDC/ MSS/ LSE (DP) □ SC/ PG OWNER (GO/GOP) 	Note: EOP-004-4 requirement ≥ 100 MW. CAISO will report for Balancing Area event. UDC/MSS will report for local events in their service territories. Note: EOP-004 applicability RC, BA, and TOP.		



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Distribution Restriction:

None

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	Note: Boxes 1 – 9 below, if any of these scenarios apply the DOE OE-417 form, must be <u>filed within one (1) hour</u> of the incident:				
6)	Uncontrolled loss of 300 Megaw atts or more of firm system loads for 15 minutes or more from a single incident.	☐ CAISO ⊠ PTO (TOP) ⊠ UDC/ MSS/ LSE (DP) ⊠ SC/ PG OWNER (GO/GOP)*	Reported by the organization that experiences the loss of firm load.		
			*Generators who have 300 MW or more of generation dedicated to one or more end- use customers (e.g., retail or industrial customers) are required to file the form under criteria number 5.		
			Note: EOP-004 applicabilityBA, TOP, <mark>and</mark> DP <mark>.</mark>		
7)	Firm load shedding of 100 Megaw atts or more implemented under emergency operational policy.	 ☑ CAISO ☑ PTO (TOP) ☑ UDC/ MSS/ LSE (DP) 	CAISO reports if CAISO initiates manual firm load shedding, UDC/PTO/MSS reports if they initiate load shedding.		
		□ SC/ PG OWNER (GO/GOP)	Note: EOP-004 applicability initiating RC, BA, <mark>and</mark> TOP <mark>.</mark>		
8)	System-wide voltage reductions of three (3) percent or more.	 ☑ CAISO ☑ PTO (TOP) ☑ UDC/ MSS/ LSE (DP) □ SC/ PG OWNER (GO/GOP) 	(Interpreted to suggest a purposeful reduction for managing loads rather than low voltage <i>caused</i> by high loads.)		
			CAISO reports if CAISO initiates reduction, UDC/PTO/MSS reports if they initiate reduction.		
			Note: EOP-004 applicability TOP <mark>.</mark>		
9)	Public appeal to reduce the use of electricity for purposes of maintaining the continuity of the Bulk Electric System.	 ☑ CAISO □ PTO (TOP) ☑ UDC/ MSS/ LSE (DP) □ SC/ PG OWNER (GO/GOP) 	CAISO reports if CAISO issues appeal, UDC reports if UDC issues appeal or MSS reports if MSS initiates. Separate reports shall be made from each, if multiple appeals are made.		
			Note: EOP-004 applicability BA <mark>.</mark>		
	te: Boxes 10 – 13 below, if any of t E OE-417 form must be <u>filed with</u>		f the above 1 – 9 scenarios apply, then the		
10)	Physical attack that could potentially impact electric pow er system adequacy or reliability; or vandalism, w hich targets components of any security systems.	 ☑ CAISO ☑ PTO (TOP) ☑ UDC/ MSS/ LSE (DP) □ SC/ PG OWNER (GO/GOP) 	Reported by organization physically attacked. For attacks impacting multiple organizations, each attacked/infected system ow ner shall submit report.		
			Note: EOP-004 applicability TO, TOP, GO, GOP, <mark>and</mark> DP <mark>.</mark>		
11)	Cyber event that could potentially impact electric pow er system adequacy or reliability.	 ☑ CAISO ☑ PTO (TOP) ☑ UDC/ MSS/ LSE (DP) ☑ SC/ PG OWNER (GO/GOP) 	Reported by attacked/infected systems ow ner. For attacks impacting multiple organizations, each attacked/infected system ow ner shall submit report.		

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DOE OE-417 Incident (per current <u>OE-417</u> form)	Reporting Responsibility By Contract (NERC function)	Notes	
Note: Boxes 10 – 13 below, if any of these scenarios apply AND none of the above 1 – 9 scenarios apply, then the DOE OE-417 form must be <u>filed within six (6) hours</u> of the incident:			
 Loss of electric service to more than 50,000 customers for one (1) hour or more. 	☐ CAISO ☑ PTO (TOP) ☑ UDC/ MSS/ LSE (DP) ☐ SC/ PG OWNER (GO/GOP)	Reported by the organization that experiences interruption to customers.	
 Fuel supply emergencies that could impact electric pow er system adequacy or reliability. 	 ☑ CAISO □ PTO (TOP) □ UDC/ MSS/ LSE (DP) ☑ SC/ PG OWNER (GO/GOP) 	The CAISO would also report if fuel supply emergency affected Bulk Electric System supply and was know n to the CAISO.	
Note: Box 14 below, if this scenario AND none of the above 1 – 13 scenarios apply, then the DOE OE-417 form must be <u>filed within one (1) Day</u> (by the end of the next calendar day after the determination of the attempted cyber compromise:			
14) Cyber Security Incident that w as an attempt to compromise a High or Medium Impact to the Bulk Electric System Cyber System or their associated Electronic Access Control or Monitoring Systems.	⊠ CAISO ⊠ PTO (TOP) ⊠ UDC/ MSS/ LSE (DP) ⊠ SC/ PG OWNER (GO/GOP)	ATTEMPTED CYBER COMPROMISE: Within one (1) calendar day of determination of the attempted cyber compromise: Schedule 1 and lines N-S and the Cyber Attributes on line T of Schedule 2 must be filed if the following criterion is met and none of the Emergency Alert or Normal Report criteria apply.	
Note: Box 15 – 27 below, if any of these scenarios apply AND none of the above 1 – 14 scenarios apply, then to DOE OE-417 form must be filed by the later of <u>24 hours after the recognition</u> of the incident OR <u>by the end of next business day</u> . (By 4:00 pm local time):			
15) Damage or destruction of a Facility within its RC Area, BA Area or TOP Area that results in action(s) to avoid a Bulk Electric System Emergency.	 ☑ CAISO ☑ PTO (TOP) □ UDC/ MSS/ LSE (DP) □ SC/ PG OWNER (GO/GOP) 	Collaboration betw een the CAISO and the PTO may be necessary in order to assess actions taken to avoid a BES Emergency. <i>Note:</i> EOP-004 applicability RC, BA, and TOP.	
16) Damage or destruction of its Facility that results from actual or suspected intentional human action.	actual human Image: PTO (TOP) Image: Comparison of the provided and the provided		
		Note: EOP-004 applicabilityBA, TO, TOP, GO, GOP, <mark>and</mark> DP <mark>.</mark>	



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Note: Box 15 – 27 below, if any of these scenarios apply AND none of the above 1 – 14 scenarios apply, then the DOE OE-417 form must be filed by the later of <u>24 hours after the recognition</u> of the incident OR <u>by the end of the next business day</u> . (By 4:00pm local time):				
17) Physical threat to its Facility excluding w eather or natural disaster related threats, which has the potential to degrade the normal operation of the Facility. Or suspicious device or activity at its Facility.	⊠ CAISO ⊠ PTO (TOP) ⊠ UDC/ MSS/ LSE (DP) ⊠ SC/ PG OWNER (GO/GOP)	The entity that ow ns/operates the Facility is responsible for reporting unless the threat impacts multiple entities within the CAISO control area. Note: EOP-004 applicability BA, TO, TOP, GO, GOP, and DP.		
18) Physical threat to its Bulk Electric System control center, excluding w eather or natural disaster related threats, w hich has the potential to degrade the normal operation of the control center. Or suspicious	 ☑ CAISO ☑ PTO (TOP) □ UDC/ MSS/ LSE (DP) □ SC/ PG OWNER (GO/GOP) 	The entity that ow ns/operates the BES control center is responsible for reporting. If the threat impacts multiple entities within the CAISO control area, the CAISO is responsible for reporting.		
device or activity at its Bulk Electric System control center.		TOP <mark>.</mark>		
 Bulk Electric System Emergency resulting in voltage deviation on a Facility ≥ 10% of nominal voltage sustained for ≥ 15 continuous minutes. 	⊠ CAISO ⊠ PTO (TOP) ⊠ UDC/ MSS/ LSE (DP) □ SC/ PG OWNER (GO/GOP)	The entity that owns/operates the Facility is responsible for reporting. If the event impacts multiple entities within the CAISO control area, the CAISO is responsible for reporting.		
		Note: EOP-004 applicability TOP <mark>.</mark>		
20) Uncontrolled loss of 200 Megaw atts or more of firm system loads for 15 minutes or more from a single incident for entities with previous year's peak demand ≤ to 3,000 Megaw atts.	⊠ CAISO ⊠ PTO (TOP) ⊠ UDC/ MSS/ LSE (DP) □ SC/ PG OWNER (GO/GOP)	EOP-004 requirement: Uncontrolled loss of firm load resulting from a BES Emergency. Uncontrolled loss of firm load for \geq 15 minutes from a single incident: \geq 300 MW for entities with previous year's peak demand \geq 3,000 MW <u>OR</u> \geq 200 MW for all other entities.		
		Note: EOP-004 applicabilityBA, TOP, and DP <mark>.</mark>		
21) Total Generation loss, within	 ☑ CAISO □ PTO (TOP) □ UDC/ MSS/ LSE (DP) ☑ SC/ PG OWNER (GO/GOP) 	The CAISO is responsible for reporting.		
one minute ≥ 2000 Megaw atts in the Western Interconnection.		Note: EOP-004 applicability BA <mark>and</mark> GOP <mark>.</mark>		
22) Complete loss of off-site pow er (LOOP) affecting a nuclear generating station per the Nuclear Plant Interface Requirements (NPIRS).	 ☑ CAISO ☑ PTO (TOP) □ UDC/ MSS/ LSE (DP) □ SC/ PG OWNER (GO/GOP) 	The PTO is primarily responsible, but the CAISO may report, depending on the nature of the event that causes the loss of off-site pow er. Note: EOP-004 applicability TO and TOP.		
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Note: Box 15 – 27 below, if any of these scenarios apply AND none of the above 1 – 14 scenarios apply, then the DOE OE-417 form must be filed by the later of <u>24 hours after the recognition</u> of the incident OR <u>by the end of the next business day</u> . (By 4:00pm local time):				
23) Unexpected Transmission loss within its area, contrary to design, of three (3) or more Bulk Electric System facilities caused by a common disturbance (Excluding successful automatic reclosing).	 ☑ CAISO ☑ PTO (TOP) □ UDC/ MSS/ LSE (DP) □ SC/ PG OWNER (GO/GOP) 	The PTO in whose area the transmission loss occurred is responsible for reporting, unless the event impacts multiple entities within the CAISO control area. <i>Note:</i> EOP-004 applicability TOP.		
24) Unplanned evacuation from its Bulk Electric System control center facility for 30 continuous minutes or more.	 ☑ CAISO ☑ PTO (TOP) □ UDC/ MSS/ LSE (DP) □ SC/ PG OWNER (GO/GOP) 	The entity that ow ns/operates the BES control center is responsible for reporting. Note: EOP-004 applicability RC, BA, and TOP.		
25) Complete loss of Interpersonal Communication and Alternative Interpersonal Communication capability affecting its staffed Bulk Electric System control center for 30 continuous minutes or more.	 ☑ CAISO ☑ PTO (TOP) □ UDC/ MSS/ LSE (DP) □ SC/ PG OWNER (GO/GOP) 	The entity that ow ns/operates the BES control center is responsible for reporting. Note: EOP-004 applicability RC, BA, and TOP.		
26) Complete loss of monitoring or control capability at its staffed Bulk Electric System control center for 30 continuous minutes or more.	 ☑ CAISO ☑ PTO (TOP) □ UDC/ MSS/ LSE (DP) □ SC/ PG OWNER (GO/GOP) 	The entity that ow ns/operates the BES control center is responsible for reporting. For example, CAISO complete loss of EMS requires a report, but loss of RTCA alone is not reportable. Note: EOP-004 applicability RC, BA, and TOP.		
27) Uncontrolled loss of a total of 500 MW or more from inverter- based resource(s) for greater than 30 minutes at a common point of interconnection to the bulk electric system.	⊠ CAISO ☐ PTO (TOP) ☐ UDC/ MSS/ LSE (DP) ☐ SC/ PG OWNER (GO/GOP)	Note: This criteria is only for DOE OE- 417 Form and not NERC Event Reporting Form.		



None

Supporting Information

Operationally Affected Parties

Shared with the Public.

<mark>References</mark>

NERC Requirements	EOP-004-4

Definitions

CAISO	California Independent System Operator (CAISO) is the Balancing Authority with Reporting Responsibilities under EOP-004-4.
Electric Utility	As defined by the DOE, a corporation, person, agency, authority, or other legal entity or instrumentality aligned with distribution facilities for delivery of electric energy for use primarily by the public. Included are investor- owned electric utilities, municipal and State utilities, Federal electric utilities, and rural electric cooperatives. A few entities that are tariff based and corporately aligned with companies that own distribution facilities are also included.
РТО	Participating Transmission Owner.
UDC	Utility Distribution Company.
MSS	Metered Subsystem (Operator).
RC	Reliability Coordinator.
SC/ PG OWNER	SC/ PG Owner Scheduling Coordinator.

Version History

Version	Change	Date
7.0	Periodic Review: Removed a section on NERC reporting due to the EOP-004-4 Attachment 1 changes. Removed approvals sections. Added Operationally Affected Parties section and document controlled statement in footer. Minor format and grammar updates.	8/01/19
8.0	Periodic Review: Added new #2 & #14 to the Events that Require DOE OE-417 Report section and updated various language to match DOE Report form. Updated from ISO to CAISO and	10/28/21

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Version	Change	Date
	removed history prior to 5-years. Minor formatting and punctuation edits.	
8.1	Clarified notes under item 9.	9/09/22
8.2	Removed ERC references. Updated links to the DOE OE-417 template, added Short DOE OE-417 form link. Added <u>OperationsCompliance@caiso.com</u> for DOE OE-417 distribution. Removed history prior to five years. Minor formatting and grammar edits.	9/05/23
8.3	Replaced Shift Manager with Manager of Real-Time Operations.	9/11/23
8.4	Item #9: Removed note, as this is no longer applicable. Added Item #27 based on new OE-417 criteria.	7/08/24
8.5	Periodic Review: Defined CAISO with first instance in General Principals section. Added References section with NERC EOP-004 standard. Minor formatting and grammar edits and removed history prior to five years.	10/10/24