Do not use this form for submitting comments. Use the electronic form to submit comments on the Electromagnetic Pulses (EMP) Task Force – Draft Strategic Recommendations by 8 p.m. Eastern, Monday, September 30, 2019.

Additional information is available on the EMP Task Force page. If you have questions, contact Senior Manager, Standards, Soo Jin Kim (via email) or at 404-446-9742.

Background Information
Protecting the Bulk Power System and assuring the effective reduction of risks to reliability are integral pieces of the Electric Reliability Organization mission. NERC has launched efforts to identify reliability concerns associated with EMPs and potential methods for promoting resilience. A task force was created in April 2019 to first identify key issues and scope areas of improvement for the industry. EMP events may pose a risk to the reliability of the Bulk Power System. In order to better understand and address these potential risks, the EMP Task Force has formulated a catalogue of strategic recommendations and policy matters.

Questions

1. Do you agree with the scope and direction of the recommendations in the Policy chapter of the report?

☐ Yes
☒ No

Please explain and/or provide additional areas of concern:

In general the policy recommendations are within an acceptable scope however there is concern with the use of the term BPS. BPS, as defined in the legislation, is very broad and encompasses many elements of the electric system that may not be under NERC’s jurisdiction. NERC Standards are written to encompass BES and those elements that affect the reliable operation of the BES. Although NERC has guideline and various guidance documents to help promote better practices, there is a reduced role and authority regarding the portions of the BPS that are non-BES and reach down to distribution level systems. An EMP event has the potential to be very impactful to distribution systems. Reestablishing these distribution systems and restoration to customers is left to local utilities. A possible policy recommendation would be to ensure that some basic minimum operational level of BES is reestablished for the local utilities to work from to perform distribution restoration. Coordination of restoration from BES to critical load serving infrastructure such as gas, water, and wastewater as well as addressing public safety should be emphasized.

Regarding Policy Recommendation #2, and in consideration that cost and funding will have to be provided through governmental channels rather than existing industry cost recovery mechanisms and
markets, DOE should be the suggested lead organization. This is a much larger issue and educating the public, drawing in national lab and information from EPRI and other large research and consulting firms is better handled by DOE. NERC is not equipped to engage in mass public educational endeavors.

Regarding Policy Recommendation #3 and the potential support organizations listed (“DHS, Asset Owners, Trade and Forum Organizations, ESCC, ISO/RTO Council”), this list needs to reviewed. The purpose of the Recommendation #3 is to coordinate with other sectors such as gas, water, and wastewater treatment. Organizations similar to NERC EISAC need to be listed here. These existing references will not be directly related to these other sectors.

Policy Recommendation #3 is not needed. There is no clear role for NERC. The activities will all be undertaken by government to address the Executive Order. If something arises in the area where NERC can assist, it will be done and need not appear as a placeholder in this report.

2. Do you agree with the scope and direction of the recommendations in the Research chapter of the report?

☐ Yes
☒ No

Please explain and/or provide additional areas of concern:

In general there is concern with compromise of National Security, depending on the level of ability to monitor research and gain accessibility to its assumptions, testing, data and methods. NERC and the industry role in research should be to provide the areas needing further research, develop parameters around what needs to be studied and what the expectation is for deliverables, e.g. cost effective hardening. Providing a level of monitoring of research may reveal thresholds of vulnerability that may render cost hardening and mitigation efforts less effective.

Although Recommendation #2 is laudable it should be identified that any gaps identified by NERC or others need to remain confidential for National Security issues. If the industry identifies weakness in specific equipment and under what conditions, it could provide an attack vector for a malicious actor. Confidentiality protocols and methods of securely communicating gaps needing further study to research labs and organizations needs to be developed.
3. Do you agree with the scope and direction of the recommendations in the Vulnerability Assessment chapter of the report?

☐ Yes
☐ No

Please explain and/or provide additional areas of concern:
Recommendation #2 should have consideration of restriction of distribution of any tools that may be developed to help an adversary determine the effectiveness of EMP on disrupting the electric system.

4. Do you agree with the scope and direction of the recommendations in the Mitigations chapter of the report?

☐ Yes
☐ No

Please explain and/or provide additional areas of concern:

5. Do you agree with the scope and direction of the recommendations in the Response and Recovery chapter of the report?

☐ Yes
☐ No

Please explain and/or provide additional areas of concern:

6. Please provide any additional comments for the EMP Task Force.

Comments: Suggest that the EMP TF focus efforts on coordination and what NERC has jurisdiction over and where value can be provided. There are a number of areas appearing in the report that NERC has no role in such as items in Utility storm plans (e.g. “Plans are in place for housing and feeding employees involved in the recovery effort”). NERC’s principle values that should be emphasized in the report are in coordinating with the DOE and stakeholders and ensuring reliability of the BES by identifying gaps, critical electric infrastructure, and the development of standards and guidance based on findings of future research.