

Supporting Statement for Electric Emergency Incident and Disturbance Report

Part B: Collections of Information Employing

Form OE-417, Electric Emergency Incident and Disturbance Report

Statistical Methods

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B.1. Respondent Universe

The U.S Department of Energy uses Form OE-417 *Emergency Incident and Disturbance Report* to monitor emergencies and incidents that affect U.S. electric power systems, including events such as the power outages caused by hurricanes Harvey, Irma, Nate and Maria during the 2017 Hurricane Season. The information gathered allows DOE to conduct post-incident reviews examining significant interruptions, or potential interruptions, of electric power or threats to the national electric system. Form OE-417 enables DOE to meet the Department's national security responsibilities and requirements as the lead agency for Emergency Support Function (ESF) #12 – Energy under the National Response Framework and the Sector-Specific Agency for energy under Presidential Policy Directive (PPD) 21 and PPD 41.

The respondent universe of this survey covers all 50 States, the District of Columbia, Puerto Rico, the U.S. Virgin Islands, and U.S. Territories. Respondents include electric utilities and entities that have Balancing Authorities (BA) and/or regional Reliability Coordinator (RC) functions. Incident events reporting, such as suspected or actual threats, vandalism, and/or cyber-attacks or total loss of power, is required for all respondents. However, it is the expectation that few, if any, reports would be filed in any given year by most respondents. There are 119 BA¹ and RC² entities established by the North American Electric Reliability Corporation (NERC) that are responsible for the physical operations and reliability coordination of business entities that file the form. All of these functions are located within existing electric utilities or in those business entities that were established by the Federal Energy Regulatory Commission (FERC). The entities that have BA responsibilities are considered the primary filer of Form OE-417. Respondents submit information via the online version of Form OE-417 or to the DOE Emergency Operations Center via email, fax, or phone.

For those electric utilities located in the United States, but for whom control area oversight responsibilities are handled by electrical systems located across an international border, those U.S.based utilities will be required to file Form OE-417 for the Office of Electricity Delivery and Energy Reliability (OE). A foreign utility handling U.S. control area responsibilities, may wish to file this information voluntarily to DOE. Any U.S. based utility in this international situation needs to inform DOE that these filings will come from a foreign-based electric system.

B.2. Statistical Methods

There is no statistical methodology applied. All incidents meeting the threshold requirements must be reported.

¹ There are 107 Balancing Authorities (BA) in the contiguous United States. Balancing Authorities are a defined NERC Functional Entity and is defined by NERC The responsible entity that integrates resource plans ahead of time, maintains load-interchange-generation balance within a Balancing Authority Area, and supports Interconnection frequency in real time.

²There are 12 Reliability Coordinators within the contiguous United States. The Reliability Coordinator is the entity with the highest level of authority and who is responsible for the reliable operation of the Bulk Electric System, has the Wide Area view of the Bulk Electric System, and has the operating tools, processes and procedures, including the authority to prevent or mitigate emergency operating situations in both next-day analysis and real-time operations. The Reliability Coordinator has the purview that is broad enough to enable the calculation of Interconnection Reliability Operating Limits, which may be based on the operating parameters of transmission systems beyond any Transmission Operator's vision.

B.3. Maximizing Response Rates

If DOE learns of an incident or disturbance that an entity has not yet reported, DOE will send e-mails or make telephone calls to the entity. If no response occurs, correspondence is sent from DOE to high level management officials in the respondent entity requesting submission of the appropriate information. In addition, upon recertification of Form OE-417, DOE will work with NERC and the Energy Information Sharing and Analysis Center (E-ISAC) to send a notification to all NERC and E-ISAC members to remind them of reporting requirements and explain that entities may submit Form OE-417 to fulfill requirements under the NERC EOP-004 Standard.

B.4. Test Procedures and Form Consultations

OE met with staff from NERC on several occasions in 2016 and 2017 to discuss the proposed changes to Form OE-417 and determine how best to incorporate questions from the NERC EOP-004 form into Form OE-417. This coordination included regular phone consultations with the NERC Standards Drafting Team. Additionally, DOE has briefed industry stakeholders on the potential updates to Form-OE-417 including the Electricity Information Security and Analysis Center and the Electricity Sub-Sector Coordinating Council.

B.5. Statistical Consultations

For additional information concerning OE-417, please contact Matthew Tarduogno at (202) 586-2892 or at <u>matthew.tarduogno@hq.doe.gov</u>. For information concerning this request for OMB approval, please contact the Thomas Broene at 202-586-5774 or at <u>Thomas.Broene@eia.gov</u>.