

Physical Security Fact Sheet

Version rev. September 27, 2021

Authority: *D.19-01-018, Public Utility Code Secs. 364 and 590, and SB 699*

Proceeding No.: *R.15-06-009*

Effective Date: *January 19, 2019*

Sector: *California Electric Utilities*

Assets Addressed: *California Electrical Distribution Grid, including affiliated Substations and Command & Control Centers*

Lead Commission Division: *Safety Policy Division*

Assigned Commissioner's Office: *Clifford Rechtschaffen*

Purpose: *Grid Resilience and Reliability, Antiterrorism, Deterrence of Deliberate Sabotage, Prevention of Trespassing and Metal Theft*

Modification Procedure for Physical Security Requirements: *Commission Decision or Resolution, or Ministerially by Lead Division Director Letter (OPs 8 and 9) (see ITPs below)*

Interim Trial Procedures (ITPs) Existing Ministerial Modification Procedure for Physical Security Requirements: *Initial Version Effective Date: June 24, 2020; First Revision: December 4, 2020*

Utility Obligations to the Commission

Major IOU Work Products Responsibility

Preliminary Assessments. This one-time deliverable would include a list of covered priority facilities subject to security plans, associated site, risk, and threat assessments. Preliminary Assessments would consist of all analysis up to but short of identification of mitigation measures. Due July 10, 2020 (D.19-01-018, OP 1)

Final Security Plan Reports. This one-time deliverable would consist of a blanket report submitted for each IOU's identified set of covered facilities that includes a list of potential and recommended mitigation measures, an identified "preferred alternative" that consists of a set of mitigation measures that the IOU supports implementing, a statement of

“response to recommendations” that asks the IOU to justify any consultant-recommended mitigation measures that the IOU declines. Due July 10, 2021 (D.19-01-018, OP 2)

Program Review and Five-year Plan Updates. This ongoing deliverable, to be completed twice per decade, would summarize efforts by utilities to keep their security plans relevant and up to date, and disclose any modifications to program approach and scope including new, remodeled, recategorized, or retired covered assets. Due August 10, 2026 (approx.) (D.19-01-018, OP 25)

Major POU Work Products Responsibility

Notice of Adoption of Final Security Plan Reports. This one-time deliverable would provide the Commission with notice -- which may consist of a copy of a signed resolution, ordinance or letter by a responsible elected- or appointed official, or utility director -- of approval action by responsible oversight entity. Due July 10, 2021 (D.19-01-018, OPs 3 and 4)

Notice of Program Review and Five-year Plan Updates. This ongoing deliverable, to be completed twice per decade, would provide the Commission with notice of approval action by responsible oversight entity within 30 days of such action taken. Due August 10, 2026 (approx.) (D.19-01-018, OP 24)

Ongoing Utility Work Products Responsibility

U.S. DOE OE-417 Reports. These Federally-mandated disclosures of disruption and security incidents are required to be provided to the Commission within two weeks of filing with Federal regulators. U.S. DOE posts to its website a summary of national reporting statistics by state that serves as rough verification tool for assessing utility reporting volumes. Due ongoing as incidents occur (D.19-01-018, OP 29¹)

Annual Reports. P.U. Code Section 590 requires electric utilities to report annually on their efforts to satisfy physical security compliance rules, with the Annual Reports to be made available to the public, allowing for exclusions that if disclosed may present a security threat. Additionally, CPUC rules require that the Annual Reports disclose insurance claims resulting from losses. Due annually March 31. (D.19-01-018, OP 31)

¹ OP 29: “Utilities shall provide to the Director of the Safety and Enforcement Division and Energy Division copies of OE-417 reports submitted to the United States Department of Energy (U.S. DOE) within two weeks of filing with U.S. DOE.”