Critical Energy Infrastructure Information (CEII) PJM Handling and Access Procedures

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Reliability Compliance
• FERC Form 715 was created to give access to the public of planning analysis so that study results could be validated
• 9/11
• FERC realized that Form 715 would be useful to a terrorist planning an attack on the electric infrastructure and restricted access to the Form 715 data they had
• Issued many Orders – 630, 630-A, 643, 649, 662, 683, 702, 833
• Order 683 dealt partially with how entities should handle CEII and requests
• PJM’s process mimics the FERC CEII protection and release process
CEII is specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure (physical or virtual) that:

1. Relates details about the production, generation, transmission, or distribution of energy;
2. Could be useful to a person planning an attack on critical infrastructure;
3. Is exempt from mandatory disclosure under the Freedom of Information Act; and
4. Gives strategic information beyond the location of the critical infrastructure.
PJM CEII Protection and Release Philosophy

• PJM established CEII Secure Areas on PJM.com
• Requests shall be made by individuals, no organizational approvals
• Requests shall be for specific CEII areas, no global approvals
• Manual 14B Section 1A
  – Entity release roles listed in Manual 14B Section 1A.3.1.1
  – “Other” role evaluation process overview in Manual 14B Section 1A.3.1.4
• Consultants required to get their Client to submit a PJM CEII Authorization Form
Current CEII Request Process

• Sign up for a PJM.com account
• Go to Library | Access Request
• On the CEII Request Form
  – Your role in the industry: PJM Member, NERC, Consultant, Non-incumbent developer, RTO, External Planner, etc.
  – A description of what CEII you want access too
  – The reason you want the CEII
  – PJM Contacts, study name
• Execute the PJM CEII NDA
Facilitator Next Steps

- When the PJM CEII Request Form is submitted, an email is sent to the Facilitator.
- Review the request in an internal CEII Request app.
- Approve or ask for resubmittal.
- Next Steps:
  - Give access to the files that can then be accessed on PJM.com.
  - Send an email to another group that handles the access.
  - If a consultant, wait for a PJM CEII Authorization Form to be submitted.