

From: john.minnicucci@sce.com
Sent: 4/23/2014 8:34:15 PM
To: Fugere, Raymond G. (raymond.fugere@cpuc.ca.gov)
Cc: Laura.Genao@sce.com (Laura.Genao@sce.com); Allen, Meredith (/O=PG&E/OU=Corporate/cn=Recipients/cn=MEAe)
Bcc:
Subject: Re: Proposed Substation Schedule

Ray:

Thank you for the opportunity to participate in the development of the Substation Security Agenda. After discussing your email and agenda with our leadership and subject matter experts (SMEs), we provide the following for your consideration.

Comments Regarding Day 1

Discussions of the Metcalf Incident and the NERC Standards, including Q&A will definitely benefit the industry, and especially the utilities whose facilities are affected. At the time of the workshop, however, the proposed NERC standards will have been sent to the FERC, but are not likely to have been adopted by that date. As such, the Panel Discussion of Future Security Standards may be premature, as we will not yet be sure of the parameters of the new Standards, and will not have had any experience working with the new Standards to be able to identify with any certainty what future Standards should address. As you might imagine, all of California's utilities will be in the process of assessing how to comply with the standards and will not likely be prepared to have a two-hour discussion on the topic of potential future standards. We thought of two possible alternatives:

1. Make the workshop a half-day event with almost all of the same topics and participants (LLNL and CAISO can join SCE and PG&E for the panel Q&A on the NERC standard); or
2. Use the 2:00 - 4:00 time slot for "public version" presentations of utility cybersecurity efforts and the CES-21 collaboration.

There are pros and cons to each of the alternatives. One important con could be that addressing physical and cyber security issues in one day may be a little overwhelming.

Comments Regarding Day 2

While discussions on NERC standards implementation, California SB 699, concerns with publicly available security information and next steps are valuable, we have concerns about presenting the findings of the reviews requested in SED's March 10 letter with the other utilities in the room. If you wish to have only a high-level or general discussion on SCE's security programs, that should not be a problem. Additionally, thirty minutes may not be enough time to cover physical and cyber security, even at a high-level. Nonetheless, please note that SCE is absolutely in favor of sharing industry best practices and similar information with other utilities, and has already done so, but it must be done in a proper forum that provides adequate safeguards against improperly publicizing the information.

Again, thank you for the opportunity to provide input. If you should have any questions, please contact me at your convenience.

Best Regards,

John Minnicucci
RP&A Manager, Advanced Technology

Southern California Edison
14799 Chestnut St.
Westminster, CA 92683

Phone: (714) 895-0159
Cell: (714) 793-3833

From: "Fugere, Raymond G." <raymond.fugere@cpuc.ca.gov>
To: "John.Minnicucci@sce.com" <John.Minnicucci@sce.com>, "Allen, Meredith" <MEAe@pge.com>,
Date: 04/18/2014 07:35 AM
Subject: Proposed Substation Schedule

John and Meredith:

Attached is a draft schedule for the substation event that SED is planning on holding. Please send me your comments by April 23 if possible.

Here is my train of thoughts on the schedule and questions.

- □ □ □ □ Opening comments from a Commissioner or Paul Clanon
- □ □ □ □ Followed by a two presentations one on the Metcalf event and then the NERC standards
 - The Metcalf so people know why we are here and what happened
 - The NERC standards to show that something is being done
 - ·Is SCE or PG&E willing to make this presentation?
- □ □ □ □ After the presentations there would be a Q&A about the NERC standards
 - Would it be possible to have somebody from each utility be available to answer questions?
- □ □ □ □ Panel discussion on standards and security.
 - Is there a benefit or to having two panels, one physical and one cyber?

Also, the second day's agenda would not be made public, nor will I post it on the daily calendar. Thank you for your time and please feel free to contact me if you have any questions.

Ray

Raymond G. Fugere, P.E.
Program & Project Supervisor
Safety and Enforcement Division
320 W. 4th Street, Suite 500
Los Angeles, CA 90013
Office (213) 576-7015

"It is easy to lie with statistics, but it is hard to tell the truth without them."

[attachment "Substation Security Agenda.docx" deleted by John Minnicucci/SCE/EIX]