

MEMORANDUM

FROM: The Keystone Center
TO: EIPC Stakeholders
RE: CEII Procedures
DATE: February 7, 2012

The Keystone Center has identified the following procedures for the secure sharing of Critical Energy Infrastructure Information (CEII)-related documents and data with stakeholders who are members of the Transmission Options Task Force (TOTF) and have received CEII clearance. We anticipate that CEII information may be transmitted or discussed during in-person meetings of the TOTF, during web-based meetings of the TOTF, and in the time periods between TOTF meetings. The procedures for sharing CEII information during each of these settings are described below.

DURING IN-PERSON MEETINGS

1. Prior to in-person meetings where CEII data or documents will be discussed, The Keystone Center will identify which attendees have CEII clearance, and which ones do not.
2. All stakeholders in attendance who have CEII clearance will be given yellow-colored name tags upon check-in at the start of the meeting. Those without CEII clearance will receive white name tags.
3. During segments of the agenda when CEII-related documents or data are discussed, all attendees who do not have CEII clearance – those with white name tags – will be asked to step out of the room.
4. Since all in-person meetings are also broadcast via webinar, The Keystone Center will follow the procedures for web-based meetings (see below).
5. When CEII-related documents or data are being discussed, no public written or oral record will be kept related to CEII content. Public records may reference the fact that CEII data was discussed, and may indicate any decisions articulated by the TOTF, if this can be done without revealing any specific CEII data.
6. Any notes or written documents produced during private sessions and related to the CEII materials will become CEII material and will be subject to all the CEII protections.

DURING WEB-BASED MEETINGS

1. Prior to web-based meetings where CEII data or documents will be discussed, The Keystone Center will identify stakeholders expected to participate who have CEII clearance.
2. Using the WebEx webinar program, The Keystone Center will send “panelist” invitations to all CEII-cleared participants. All other stakeholders will be required to register and participate as “attendees.”

3. At the beginning of these webinars, The Keystone Center will ensure that all of those logged in as “panelists” are indeed cleared for CEII and will ask for confirmation by an EIPC official.
4. When the group approaches a section of the agenda that will involve CEII-related data or discussions, The Keystone Center will remind the group of the procedures related to CEII information (particularly those points discussed in numbers 4-7 below), and then will place the WebEx meeting into “practice session” mode. The practice session mode will make the meeting’s audio and visual components available only to those participating as “panelists,” all of whom have received CEII clearance. “Attendees” will only see an indication that the “panelists” are in a practice session. Additionally, the program will cease recording during this period. (For more information about the WebEx “practice session” mode, please review the attached WebEx Practice Session guide.)
5. Once the CEII-related section of the agenda has concluded, the practice session will be ended, and the webinar, including all audio and visual components, will resume for all participants. Every attempt will be made to put CEII agenda items at the end, so attendees can sign off and do not have to wait for the webinar to resume.
6. When CEII-related documents or data are being discussed, no public written or oral record will be kept related to CEII content. Public records may reference the fact that CEII data was discussed, and may indicate any decisions articulated by the TOTF, if this can be done without revealing any specific CEII data.
7. Any notes or written documents produced during private sessions and related to the CEII materials will become CEII material and will be subject to all the CEII protections.

BETWEEN MEETINGS

1. When documents or files containing CEII data are made available for transmission to TOTF members between meetings, stakeholders with CEII clearance will be notified by e-mail.
2. Those stakeholders with CEII clearance will e-mail Ian Grant of the Tennessee Valley Authority (TVA) at isgrant@tva.gov to request access to the documents/files.
3. Ian Grant will check to ensure that the stakeholder requesting access has received CEII clearance. He will then respond to the stakeholder with details on how they may access the file or document. This will typically involve a short time window of access to a secure FTP site.
4. No CEII documents will be posted to the public EIPC website, but if appropriate, may be noted as available from TVA for those with CEII clearance.

In all cases, stakeholders with CEII clearance will be reminded during these sessions to maintain the security of all CEII-related data and documents, and ensure that the information is not shared with or accessible to individuals who do not have CEII clearance in accordance with the CEII clearance agreement.