Identification, Protection, and Labeling of CEII Materials

M3-RC-2201, Rev. 1

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1. **Purpose**

This procedure provides guidance and processes by which Northeast Utilities (NU) Transmission will identify, protect, and label Critical Energy Infrastructure Information (CEII).

CEII refers to confidential information vital to critical electric operations, transmission, generation, and distribution that, if utilized by someone wishing to do harm, could facilitate disabling the Bulk Electric System. It should be treated as a form of Confidential Information in accordance with NU policies and procedures. CEII is vital to security on several levels; by protecting CEII materials, NU is able to protect assets critical in the Bulk Power System.

This document will:

- Assist NU personnel in determining the kinds of internal information considered to be CEII,
- Provide guidance on properly protecting and labeling such information,
- Describe a process under which third parties may be granted access to CEII, and
- Identify the role of NU personnel in the protection of CEII.

2. **Scope**

The scope of this procedure is limited to those documents that are being sent outside of NU. Examples of these documents may include, but not be limited to regulatory filings, siting council filings, information needed by third party vendors pursuant to a contractual relationship, and external information requests. **CEII documents can be shared internally with NU personnel without going through formal procedures of redacting**, however these documents shall be labeled as CEII materials.

NU personnel who interface with vendors or the general public regarding project work or Public Relations’ activities that may have knowledge of, or intend to share information that may be considered CEII are also included in the scope of the CEII process. Before introducing materials in a public forum, documents shall be reviewed for potential CEII content in accordance with this procedure.
External Trusted Parties

Where information sharing is part of existing processes, NU may still disclose information to trusted third parties. Trusted third parties are designated as those entities who have signed NDA's on file with NU. Examples of trusted parties may include but not be limited to Northeast Power Coordinating Council (NPCC), North American Electric Reliability Corporation (NERC), Independent System Operator – New England (ISO-NE), regulatory bodies with whom NU has regulatory obligations, New England Participating Transmission Owners-Advisory CEII Committee members (PTO-AC) who have signed an “overarching” agreement between companies and other partner utilities who have signed, active NDA’s on file with NU.

ISO-NE Methodology for Presenting CEII

It is important to note that the New England Power Pool (NEPOOL) Reliability Committee (RC) and ISO-NE Planning Advisory Committee (PAC) meeting materials may contain CEII. In these instances, ISO-NE will conduct a pre-screening of all attendees to ensure that all participants at the meeting are authorized to view materials containing CEII.

In the event that NU submits materials for RC or PAC meetings, the materials must be submitted to ISO-NE and/or NEPOOL with CEII labeling.

2.1. Background

Following the terrorist attacks of September 11, 2001, concern arose regarding the handling of CEII materials at Federal Energy Regulatory Commission (FERC) and other Federal agencies. On October 11, 2001, the FERC issued a Policy Statement removing maps and diagrams that could provide useful information to terrorists planning attacks on energy infrastructure from the public reference room.\(^1\)

Between 2003 and 2007, FERC established detailed procedures and clarification for the filing and access to CEII.

While CEII designation is an important component of information protection, FERC has also indicated that Transmission Owners (TO) should “increase transparency and customer access to information.”\(^2\) In addition, FERC has indicated that the over-use of CEII labeling will be penalized.\(^3\) Thus, it is imperative that TOs do not overuse the CEII designation to restrict access to data that should otherwise be available for public scrutiny. It is also critical that TOs have consistent CEII policies and procedures to prevent confusion and contradiction among CEII requestors and providers.

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1 FERC Docket No. PL02-1 – Treatment of Previously Public Documents (October 11, 2001)
2 FERC Order 890 Fact Sheet
3 FERC 18 CFR Part 388 (Docket No. RM06-24-000; Order No. 683) – Critical Energy Infrastructure Information (Issued September 21, 2006)
2.2. Definitions

CEII FERC defines CEII as “specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure (physical or electronic) 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, 5 U.S.C. (2000); and (4); gives strategic information beyond the location of the critical infrastructure.”

Critical Infrastructure NERC defines Critical Infrastructure as “the Systems and Assets, whether physical or virtual, that are so vital to the United States that the incapacity of destruction of such systems or assets would have a debilitating impact on the security, national economic security, national public health or safety, or any combination of those matters.”

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5 USA Patriot Act of 2001 – H.R. 3162 (Sec. 1016 Critical Infrastructure Protection)
3. Roles and Responsibilities

**CEII Coordinator**

The CEII Coordinator is identified formally through FERC Order 890. The CEII Coordinator's role is to assist in promoting CEII awareness and organizing CEII procedures at NU.

The CEII Coordinator will:
- Maintain this procedure, M3-RC-2201, and ensure that the Transmission organization employs proper CEII processes.
- Work with Information Owners and Information Users as necessary, to coordinate determination of CEII within materials intended for external/public use.

The CEII Coordinator can be reached at CEII@nu.com, or at (888) 456-2424 (internal extension x2902).

**Information Request Recipient (Internal)**

The Information Request Recipient can be an individual or department that receives requests for NU information from an external agency or party (Requestor).

The Request Recipient will:
- Be aware that information requested may contain confidential information and/or CEII.
- Forward information requests to the Information Owner.
- If the information requested has been created by a third party Information Owner (not created by NU), the Request Recipient should either forward the request to the Information Owner, or give the Requestor contact information from which the requested information may be acquired directly.

**Information Owner (Internal)**

The Information Owner is the originator of information that may contain CEII, such as documents, studies, or procedures. The Information Owner is a Subject Matter Expert regarding any materials he or she develops, but can also work with additional personnel to determine CEII as necessary.

Information Owners may also be third-party vendors NU has contracted to support projects, or other third party organizations, such as Independent System Operators, who generate reports and information.

The Information Owner will:
- Identify and demark CEII within materials before passing them to an Information User who will be utilizing materials for external purposes, such as filings or public presentation.
Work with other involved personnel to identify and redact CEII from materials intended for external/public use, as necessary.

Provide necessary guidance to the Request Recipient and/or Information User on the dissemination of CEII.

**Information User (Internal)**

The Information User is an individual who receives materials containing CEII from an Information Owner for *internal* or *external* use.

*Note: While the Information User is not responsible for identifying and demarking CEII within materials, it is his or her responsibility to ensure through communications with the Information Owner that CEII is protected before sending information outside NU.*

The Information User will:

- Notify the Information Owner if the requested materials are intended for external/public filings and/or venues.
- Work with the Information Owner and, as necessary, consult with other subject matter experts to ensure protection of CEII within materials intended for external/public use.
- Ensure information sent externally is only received by authorized persons (those individuals under a Protective Order and/or Non-Disclosure Agreements with verified identities).
- Ensure CEII materials and NDAs are stored electronically with related information, such as placement of materials in TRACS, EDMS, or RIM.

**Legal Department**

The Legal Department (“Legal”) works to gain Protective Orders for external regulatory hearings/processes that will require the disposition of CEII materials.

The Legal Department will:

- Work with the Information Owner, as necessary, to determine if a document contains CEII and/or complete the redaction process.
- Work with the Information Owner to complete the redaction process if required.
- Work with the Information User to resolve issues concerning NDAs and identity verification forms.
- Resolve legal challenges to identification and redaction of CEII.

**Transmission Contract Administration/Purchasing**

Transmission Contract Administration, along with Purchasing is responsible for ensuring contracts with vendors who may receive or create CEII materials, such as external engineering firms or planning studies contain signed NDAs and includes language ensuring that CEII will not be shared with personnel who have not signed an NDA.
4. Process Steps

4.1. Receive Proprietary Information Request

Information Request Recipient

4.1.1. Process Request for Northeast Utilities (NU) proprietary information from an external requestor.

Note: See Appendix A for NU’s Guidelines for handling CEII materials in Siting Proceedings.

Note: See Appendix B for Guidelines on handling non-written CEII information.

4.1.2. Notify the Information Owner that information has been requested from his/her department.

Note: If the Information User/Owner is unknown, consult with a supervisor or manager in the department responsible for the information.

Note: If the information requested was created by an external organization (e.g. ISO-NE), forward the request to the external Information Owner, or give the requestor contact information for the external Information Owner from whom the requested information may be acquired directly.

4.2. Identify CEII Materials

Note: See Attachment C for guidance in identifying CEII materials.

Information Owner (Internal)

4.2.1. Receive notification of potential CEII request.

4.2.2. Gather the requested materials contain CEII, review contents for CEII.

Note: Individuals involved in the determination and redaction of CEII content within NU materials shall consider the following questions:

- Is the subject related to the Bulk Power System, Critical Facilities, Critical Assets, or Critical Cyber Assets?
- Could this material be used to harm the electric system infrastructure?
- Does the information disclose specific weaknesses and vulnerabilities of the BPS?
- Does the information disclose specific conditions that produce overloads and the specific overloads that are produced?
- How is the material (e.g., maps, diagrams, studies, applications) presented?
Does the material discuss contingencies and critical infrastructure weaknesses?

4.2.3. Determine if requested materials contain CEII

- If materials do not contain CEII, with management approval, release the information to the Information User/Information Requestor.
- If materials contain CEII, go to step 4.2.4.

4.2.4. Determine if requested materials containing CEII have already been redacted.

- If materials have been redacted, go to step 4.3.2.
- If materials have not been redacted, go to step 4.3.1

4.3. Redact and Label CEII Material

Note Materials released to external sources should be protected or redacted using one of the two following methods: Separate CEII Attachments or Redact CEII within a document.

Note: Retroactive Labeling of CEII: If an Information Owner knows of materials previously released to the public that contain information similar to materials currently being protected as CEII, that Information Owner shall label and redact current and future versions of the CEII. However, the Information Owner cannot retroactively redact information that has already been released to the public.

This retroactive labeling is important for materials in circulation, such as specific maps, diagrams, or studies that could place company assets at risk.

Information Owner (Internal)

4.3.1. Separate CEII into discreet documents or sections which are not intermixed with non-CEII materials.

Or

If CEII is intermixed with other materials that cannot be removed, redact any CEII identified in the document. (see Figure 1)

Figure 1: CEII Demarcation within a Document

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- Line), along with the two generating units.  
- (which would damage or destroy the equipment and could lead to public safety concerns because of...
4.3.2. Label the document that contains CEII with a prominent explanatory legend (such as the cover page): “This document contains Critical Infrastructure Information (CEII) that has been demarcated. Do not provide to Unauthorized Persons.”

**Note:** If information is being sent to ISO-NE and is deemed CEII, the materials should be secured with password protection. The label should read: “This document contains Critical Infrastructure Information (CEII) that has been demarcated. Do not Provide to Unauthorized Persons.”

4.3.3. Verify that the Information User and Information Requestor have a related signed NDA on file.

4.3.4. Is there a related signed NDA on file?
- If there is not a related signed NDA on file, go to step 4.3.5.
- If there is a related signed NDA on file, go to step 4.3.8.

4.3.5. Has the Information User’s/Information Requestor’s identity been verified?
- If the Information User’s/Information Requestor’s identity has not been verified, go to step 4.3.6. Perform an Identity Verification check.
- If the Information User’s/Information Requestor’s identity has been verified, go to step 4.3.7.

4.3.6. Perform a Information User/Information Requestor Identity Verification check. Go to step 4.3.7.

4.3.7. Obtain a signed NDA from the Information User/Information Requestor and any other external source that will have access to the CEII materials.

4.3.8. Determine if a Protective Order is needed?
- If a Protective Order is needed, coordinate with Legal to obtain a Protective Order. Go to step 4.3.9.
- If a Protective Order is not needed or has already been obtained, go to step 4.4.1.

**Legal**

4.3.9. Coordinate with the Information Owner to obtain a Protective Order.
4.3.10. Obtain Protective Order Through the Appropriate Channels.

4.3.11. Distribute the Protective Order to the appropriate parties. Go to step 4.4.1

4.4. **Protect CEII Materials**

*Note: It is important to consider how to protect both documents and information being released to external recipients. In order for external parties to receive CEII materials, those parties must execute NU’s CEII NDA, and, as applicable, complete an Identity Verification form and if necessary NU’s Legal Department shall secure a Protective Order.*

*Note: See Attachment B for the process of protecting verbal and electronic CEII materials, Retroactive Labeling of CEII materials and CEII information discussed at public meetings.*

**Information Owner**

4.4.1. Review the materials for CEII content, appropriate redaction/demarcation and labeling.

4.4.2. Verify that all CEII materials is redacted or demarked?
   - If there are questions concerning the CEII redaction/demarcation or labeling return to step 4.3.1.
   - If CEII redaction/demarcation and labeling is in order, go to step 4.4.3.

4.4.3. Verify that the necessary NDA(s) have been signed by all external sources who will be handling the CEII materials?
   - If all appropriate NDA(s) have not been signed, return to step 4.3.7
   - If all appropriate NDA(s) have been signed, go to step 4.4.4

4.4.4. Release the information to the Information User/Information Recipient.

**Information User/Information Recipient**

4.4.5. Receive the CEII Protected materials from the Information Owner.

4.4.6. Store the CEII Information in a protected location upon completion of its usage.
5. Administrative Information

5.1. Requirements

This document fulfills requirements set forth in 18 CFR Section 388.113, and FERC Docket No. RM06-24-001; Order No. 683-A – Critical Energy Infrastructure Information (April 9, 2007).

5.2. Definitions and Acronyms

The definition of specific terms and acronyms included in this document are found within the document and in

- Northeast Utilities CEII Procedures
- PTO-AC CEII Guidelines

5.3. References

Internal NU Documentation

NUP 34: Confidential Information (revised 8/11/2008) available on NUNET Policy Central NUCIP 34

NUP 32: Use of Technology (revised 5/29/2009) – available on NUNet Policy Central: NUP 32

CIP-2502, “CIP Information Protection Program” CIP 2502 CIP Information Protection Program

External Documentation


USA Patriot Act of 2001 - H. R. 3162 (Sec. 1016. Critical infrastructures protection)


FERC 18 CFR Parts 4, 16, 141 and 157 (Docket No. Docket No. RM03-6-000; Order No. 643) – Amendments to Conform Regulations With Order No. 630 (Critical Energy Infrastructure Information Final Rule – Issued July 23, 2003)

FERC 18 CFR Part 388 (Docket No. RM06-24-000; Order No. 683) – Critical Energy Infrastructure Information (Issued September 21, 2006)
FERC 18 CFR Part 388 (Docket No. RM06-24-001; Order No. 683-A) – Critical Energy Infrastructure Information (April 9, 2007)

FERC Guidelines for Filing Critical Energy Infrastructure Information (CEII) – Available from FERC website

FERC Order 890, “Preventing Undue Discrimination and Preference in Transmission Service” (February 16, 2007)

FERC Order 890 Fact Sheet

FERC Docket No. PL02-1 – Treatment of Previously Public Documents (October 11, 2001)

Comments from NERC on FERC Rule Regarding Critical Energy Infrastructure Information (Docket No. RM02-4-000, Docket No. PL02-1-000)


6. Summary of Changes

Revision 1
Changes made to this document include:

Section 2 - Scope: Rearranged paragraphs to make the procedure more “reader friendly.” Made changes to styles and formats. Included a Input, Process, Output (IPO) diagram.


Section 4 – Process Steps: The Process Steps were revised in order to make this procedure a generic guideline since there are variations in the way individual organizations/departments handle CEII material.

Section 5 – Administrative Information: Hyperlinks have been added to referenced documents that are located on NU Net Policy Central. The Definitions and Acronyms table has been removed and replaced with links to NU CEII procedures.

The procedure for Handling CEII materials in siting procedures, the NUSCO CEII non-disclosure agreement and the NUSCO CEII identify verification form has been added as attachments to this document.

Revision 0
None – This procedure is the original issue.
Attachment A, Handling CEII in Siting Proceedings

1. Introduction
This procedure is intended to provide guidance to all affiliates of Northeast Utilities Service Company (NUSCO) with respect to the classification and disclosure of CEII materials in the context of transmission infrastructure siting proceedings, including disclosures that precede the filing of an application but are related to the application process.

This document will:
- Assist personnel who prepare and file siting applications and related materials in determining the kinds of internal information that qualify as CEII
- Provide guidance on properly labeling such information
- Provide for the entry of a CEII Protective Order in a siting proceeding, to expedite the sharing of CEII with a siting agency, its staff, parties and intervenors.

2. Definitions

CEII
FERC defines CEII as “specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure (physical or electronic) that: (1) relates details about the production, generation, transmission, or distribution of energy; (2) could be useful to a person planning on attack on critical infrastructure; (3) is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. (2000); and (4); gives strategic information beyond the location of the critical infrastructure.”

Critical Infrastructure
NERC defines Critical Infrastructure as “the System and Assets, whether physical or virtual, that are so vital to the United States that the incapacity or destruction of such systems or assets would have a debilitating impact on the security, national economic security, national public health or safety, or any combination of those matters.”

Critical Assets
In addition, NERC Identifies Critical Assets as “Facilities, systems, and equipment which, if destroyed, degraded, or otherwise rendered unavailable, would affect the reliability or operability of the Bulk Electric System.”

Examples:
- Function and physical location
- Black start facilities
- Extra high voltage (>230 kV)
- Locations and responsibilities of control and operating entities

7 NERC Glossary of Terms Used in Reliability Standards (4/20/2009)
8 ibid
9 NERC Security Guidelines for the Electricity Sector, "Protecting Potentially Sensitive Information," version 1.0 (June 14, 2002)
Details of critical computer systems (e.g., operational systems such as Energy Management Systems (EMS), Supervisory Control and Data Acquisition (SCADA), digital control systems, their names and function, CAD/CAM facilities, network configuration and firewall schemes).

3. Information in Siting Filings Likely to Qualify as CEII

CEII “does not include information that is otherwise publicly available. Simplified maps and general information on engineering, vulnerability, or design that relate to production, generation, transportation, transmission or distribution of energy shall not constitute CEII.”

Certain elements of the Bulk Power System qualify as “Critical Infrastructure.” Siting proceedings in which approval for Bulk Power System elements is sought typically include requirements to demonstrate a need for the proposed facility, the advantages of the proposed facility as compared to non-transmission alternative solutions to the need, information concerning the location of the proposed and existing facilities, and information concerning the design and construction of the proposed facility. Such information may or may not constitute CEII, depending on whether it provides sufficient detail so as to be potentially useful “to a person planning an attack on critical infrastructure.”

4. Specific Examples

The following examples illustrate how materials will or will not qualify as CEII, depending on their level of detail:

4.1. Maps/Diagrams

**CEII Treatment Required**

- Northeast 345kV system diagram (includes bus detail)
- Diagrams/maps submitted as part of the modeling info (assumes level of detail is such that it can be utilized for modeling purposes, but not known contingencies that would aid modeling of system problems)
- New England Regional System Plan (RSP) – RSP06 Northern and Southern Area Maps
- ISO-NE Detailed Price Node (PNode) diagram
  - Detailed diagram (marked CEII because it contains detail of each substation with breaker, transformer, bus conditions, and generator location)

**CEII Treatment Not Required**

Maps/Diagrams That Can Be Made Public Include:

- New England one-line diagram (no detail that requires protection)
- New England Geographic and/or Geographic Transmission Map including topical transmission maps (not enough detail)
  - Exception for maps with generator type indicated (such as nuclear in the above list)
- ISO-NE General PNode diagram

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4.2. Reports, Data, etc.

CEII Treatment Required

- Load Power Factor Studies and Audit Results
- Sections 2, 3 and 6 of Form 715
- Portions of Capacity, Energy, Loads and Transmission (CELT) report that include technical detail as noted above
- Detailed System disturbance/event follow-up/Blackout report (describes vulnerability)
- Market/Reliability event related to a system disturbance (describes vulnerability)
- Annual Maintenance Schedule (can be used to derive vulnerability as it incorporates forecast of capacity shortcoming
- Transmission Maintenance Schedule (can be used to derive vulnerability)
- Reliability Agreement info (i.e., Southwest CT Gap info – depicts needs)
- Study analysis (depicts engineering data):
  - NX-9
  - NX-11
  - 1.3.9

CEII Treatment Not Required

- Generic Interface Constraints spreadsheet
- Claimed Capability Report (lacks detail)
- Installed Capacity Requirement (ICR) report
- Financial Transmission Rights (FTR) related reports
- Contingency definitions spreadsheet (detailed, yet may lack value unless coupled with results – case by case basis)
- Line and ZBR Definitions spreadsheet (detailed, yet may lack value unless coupled with results – case by case basis)
- Monthly Interface Limits spreadsheet (only depicts limits with no detail)

5. Document Control

To the extent practicable, CEII in siting filings should be aggregated in discrete documents or volumes in which it is not intermixed with non-CEII materials. Such documents or volumes shall bear a legend on the cover and in a header on every page: “Confidential Critical Energy Infrastructure Information (CEII) Subject to Protective Order and/or Non Disclosure Agreement. Do Not copy or Provide to Unauthorized Persons.”

When CEII is intermixed with other materials, it must be securely redacted, and the redaction must be accompanied by a notation: “Confidential CEII.” Each volume or document that contains such redactions shall include a prominent explanatory legend: “This document contains Critical Infrastructure Information (CEII) which has been redacted.”
The redacted information is or will be available to parties and intervenors in the administrative proceeding in which this document has been or will be filed, pursuant to a Protective Order of the CEII Coordinator. In either case the Recipient will be required to execute a Non-Disclosure Agreement.

Both physical and electronic copies of information must be segregated, labeled, and redacted as described above.

6. Protection of CEII Materials in Filings and Submissions

It is imperative to protect CEII within external submissions, such as those to regulatory agencies and public forums. This section refers to a process in which NU must obtain protection for identified CEII regulatory submissions.

Information Owner

The Information Owner (or delegate) should prepare materials for regulatory filings, such as the Connecticut Siting Council (CSC) or other state siting authority, the Department of Energy and Environmental Protection (DEEP), or any public utility commission and/or its consultants engaged in commission work as follows:

Review the document to determine if it contains CEII, or ask for assistance in the identification and redaction process:

- If the document is determined to contain CEII, redact the document per the guidelines in Section 4.3 of this document.

Create two versions of the document:

1. Public with contents redacted appropriately
2. Non-Public, labeled as CEII

Consult with Legal to determine if Protective Order will be sought.

- If yes, work with Legal counsel to assure that materials containing CEII are filed and served on parties and intervenors in accordance with Protective Order procedures.

- A Protective Order may require parties and intervenors to execute “Northeast Utilities Service Company CEII Non-Disclosure Agreement,” and “Northeast Utilities CEII Identity Verification Form,” in addition to being subject to terms of a Protective Order. In that case, parties and intervenors will be subject to identity verification procedures.

- If the identity verification is questionable or problematic, inform the Legal Department first, then, upon direction from Legal, notify Corporate Security.
Attachment B, Handling Non-Written CEII Materials

1. Verbal versus Written CEII

While it is strongly recommended that all instances of CEII be released only with NDAs, if a presentation that contains CEII must be made to third parties, but it is not appropriate to have these parties sign NDAs, the presenter must give a clear verbal warning regarding the confidential nature of the presentation:

- CEII is confidential and critical to national security per the Department of Homeland Security and FERC.
- Please do not take any notes, or repeat any of the information heard in this presentation outside of this room.
- If materials are handed out in this instance, the presenter must recover all materials at the end of the session.

2. Electronic Information Protection

It is also important to retain the same policies for electronic distribution of CEII. If CEII materials are being released electronically, they must be treated as Confidential Information.

To secure confidential electronic files containing CEII please refer to the NUNet policy: Information Security Requirements, Section 2.0, Information Handling Requirements. These requirements give labeling locations and instructions about the electronic transfer of protected information. For instance, CEII distributed electronically must be encrypted or password protected (via File Transfer Protocol (FTP) or ZIP files). You can access this policy by clicking on the following link.

Information Security Requirements
Attachment C, Identifying Common CEII Materials

The following list of information is available in the PTO-AC document, “PTO-AC Guidelines for Handling CEII Materials and CEII Requests” (June 25, 2009).

Additional recommendations for handling CEII are included in the NERC Security Guidelines for the Electricity Sector, “Protecting Potentially Sensitive Information,” version 1.0 (June 14, 2002) for determining if materials should be treated as CEII.

**Maps/diagrams**

*What types of information require CEII labeling for maps/diagrams?*

- Detailed representation of transmission components containing elements of Bulk Power System, Critical Facilities, Critical Assets and Critical Cyber Assets (i.e., Breaker/transformer, with ratings, connections, etc.)

  *Note: Some distribution and generation interconnection diagrams may contain Bulk Power System, Critical Facilities, Critical Assets and Critical Cyber Assets information.*

- Depiction of line ratings or transfer capability or bottlenecks for any Bulk Power System element or resource components: i.e., the output of analyses that illustrates or infers Bulk Power System problems under contingencies, such as might be used to technically substantiate needs for system improvements

- Maps, diagrams, and system elements related to nuclear facilities

  *Note: Maps that might otherwise appear to be innocuous may contain legends that provide CEII-level detail.*

*What types of maps/diagrams can be made public?*

- One-line type representation of transmission lines (simple schematic one-lines, not the output of PSS/E or similar analysis software) that may include:
  - Voltage level(s): i.e., the nominal conductor ratings, not voltage problems
  - TO territory or ownership

- Geographic maps without technical details

**Examples:**

**CEII marking required:**

- Northeast 345kV system diagram (includes bus detail)
- Diagrams/maps submitted as part of the modeling info (assumes level of detail is such that it can be utilized for modeling purposes, but not known contingencies that would aid modeling of system problems)
- New England Regional System Plan (RSP) – RSP06 Northern and Southern Area Maps
- ISO-NE Detailed Price Node (PNode) diagram
  - Detailed diagram (marked as CEII because it contains detail of each substation with breaker, transformer, bus conditions, and generator location)

**Public** (no CEII demarcation):

- New England one-line diagram (no detail that requires protection)
- New England geographic and/or Geographic Transmission Map including topological transmission maps (not enough detail)
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- Exception for maps with generator type indicated (such as nuclear in the above list)

- ISO-NE General PNode diagram:
  - Versions of PNode diagrams without bus / breaker /transformer detail listed (similar to a basic one-line diagram)

Reports, data, etc.

*Note: Reports that have sections designated as CEII should be labeled as containing CEII.*

What aspects require CEII demarcation for this category?

- The inclusion of any of the protected maps from above in report
- Detailed descriptions of Bulk Power System components or protective schemes (i.e., relay and protection info, special protection system detail, substation design detail)
- Description of a specific Bulk Power System weakness or vulnerability
  - “Needs” description specifying the conditions or contingencies that lead to the need
  - Description of a justification for an alternative (indirect reference to weakness or vulnerability)
  - Market performance language that indirectly describes or relates to a specific weakness or vulnerability in the bulk power system
  - Powerflow cause and effect description
  - Powerflow data

Examples:

**CEII marking required:**

- Load Power Factor Studies and Audit Results
- Sections 2, 3 and 6 of FERC Form 715
- Portions of Capacity, Energy, Loads, and Transmission (CELT) report that include technical detail as noted above
- Detailed System disturbance/event follow-up/Blackout report (describes vulnerability)
- Market/Reliability event related to a system disturbance (describes vulnerability)
- Annual Maintenance Schedule (can be used to derive vulnerability as it incorporates forecast of capacity shortcoming)
- Transmission Maintenance Schedule (can be used to derive vulnerability)
- Reliability Agreement info (i.e., Southwest CT Gap info – depicts needs)
- Study analysis (depicts needs or vulnerability):
  - Maine Power Reliability Program (MPRP)
  - Southeastern Massachusetts Reliability Region (SEMA)
  - Millstone Severe Line Outage Detector (SLOD) Special Protection System (SPS) Stability Report
- Data/info submittals (detailed engineering data):
  - NX-9
  - NX-11
  - PPA I.3.9

Public (no CEII demarcation):

- Generic Interface Constraints spreadsheet
- Claimed Capability Report (lacks detail)
- Installed Capacity Requirement (ICR) report
Financial Transmission Rights (FTR) related reports
- Contingency definitions spreadsheet (detailed, yet may lack value unless coupled with results – case by case basis)
- Line and ZBR Definitions spreadsheet (detailed, yet may lack value unless coupled with results – case by case basis)
- Monthly Interface Limits spreadsheet (only depicts limits with no detail)

**Critical Infrastructure Protection**

Any materials classified as protected CIP information through the PTO's CIP methodologies and processes are CEII, but are subject to specific handling restrictions as detailed in the NERC CIP Standard Requirements.
Attachment D, Examples of CEII and Non-CEII Documents

Examples and demarking for CEII (please do not distribute outside NU without NDA):

Example #1
The Springfield area includes the City of Springfield and extends west to Blandford, south to the Connecticut border, north to Amherst and east to Ludlow.

The transmission system serving the Springfield area requires upgrades to meet national and regional reliability standards due in part to the following:

- Customer demands for electricity continue to grow.
- Many existing 115-kV transmission circuits have relatively low capacities.
- Many overhead 115-kV transmission circuits were built on common lines of structures. Outages to double circuit lines can have a significant reliability impact on the local area.
  
  **[BEGIN CEII]**
  Significant power flows originate from a single source at the 345/115-kV Ludlow Substation and move west toward the Breckwood and West Springfield Substations. **[END CEII]**

System impact analyses incorporating forecasted peak demands show: a) power flow conditions on existing transmission facilities exceed existing capabilities and b) voltage profiles at load-serving substations below acceptable limits.

This information specifies a system weakness that could be used to damage the BPS.

Example #2
WMECO’s transmission network also includes 346.0 circuit miles of 115-kV lines (including 9.4 miles of cable circuits), and 5.5 circuit miles of 69-kV line. These transmission lines include ties to other electric and municipal utilities including CL&P, NGrid, City of Holyoke Gas and Electric Department (“HG&E”), and Holyoke Water Power Company (“HWPCO”). Also interconnected to the WMECO transmission system at the 69-kV level is the City of Springfield’s Cobble Mountain generating plant.

**[BEGIN CEII]** WMECO currently has one major bulk-power substation in the Springfield area where the 345- and 115-kV transmission networks interconnect. The Ludlow Substation interconnects the 345-kV transmission system to the 115-kV transmission system using large autotransformers. This substation enables bulk power from the large central generating stations (such as Northfield Mountain and Stony Brook) and power imported over four 345-kV transmission tie lines to be delivered to the Springfield area 115-kV transmission system. The Ludlow Substation is considered a “strong” source or “hub” in the WMECO 115-kV transmission system. **[END CEII]**

This information specifies a significant aspect of the system that, in conjunction with other information in the same document, could be used to damage the BPS.
Example #3

Typically, during peak demand periods, power flows west from Ludlow to the Agawam Substation through both the west side and the east side of the interior loop, and south from Ludlow through the outer loop to the far east of Springfield, then circling around to the South Agawam and the Agawam Substations. **[BEGIN CEII]** However, the interruption of transmission circuits on either of the major corridors of the interior loop causes more power to flow on the remaining in-service circuits. If the loss occurs on the transmission circuits on the west side, the remaining circuit from the East Springfield area cannot reliably carry the resulting power flow toward West Springfield and Agawam. The high power flows overload the present capability of the existing cables on the east side of the interior loop, even with the assistance of the fourth circuit carrying power around the outer loop to the Agawam Substation. **[END CEII]**

*This information specifies a means to disable a significant portion of the area BPS.*

Example #4

To address the identified reliability issues, three new 345 kV facilities were found to be necessary to support the Greater Rhode Island area and to better integrate it with the rest of the New England system. Generally, these improvements would bring a third source into Rhode Island. **[BEGIN CEII]** Currently, the existing 345 kV lines from Sherman Road to West Farnum and from ANP Bellingham to Brayton Point are the two key supplies into the state. **[END CEII]** The improvements also would extend a second source into the load center in southern Rhode Island and add a new source into a 115 kV load center located just east of the Rhode Island border. Several options were evaluated for each of these facilities, which are described in the following sections.

*This information specifies a means to disable a significant portion of the area BPS.*

Example #5: CEII Contingencies Data

The table below, which is accompanied by descriptive paragraphs in the original document, shows the contingency load-flow results that would not satisfy Northeast Power Coordinating Council ("NPCC"), North American Electric Reliability Corporation (NERC), ISO-New England ("ISO-NE") and NU reliability standards, when the 310 and 368 circuits are out-of-service at the same time. The table and associated descriptive information is considered CEII.

**[BEGIN CEII]**

<table>
<thead>
<tr>
<th>From Bus</th>
<th>To Bus</th>
<th>Circuit #</th>
<th>Flow before second circuit trips</th>
<th>Flow after second circuit trips</th>
<th>LTE Rating</th>
<th>% rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>Millstone</td>
<td>Montville</td>
<td>371</td>
<td>1116.8</td>
<td>2032.9</td>
<td>1793</td>
<td>110</td>
</tr>
<tr>
<td>Montville</td>
<td>Haddam Neck</td>
<td>364</td>
<td>1158.3</td>
<td>2117.1</td>
<td>1912</td>
<td>108</td>
</tr>
<tr>
<td>Millstone</td>
<td>Haddam auto</td>
<td>348</td>
<td>1195.9</td>
<td>2114.2</td>
<td>1912</td>
<td>107</td>
</tr>
<tr>
<td>Millstone</td>
<td>Haddam auto</td>
<td>348</td>
<td>1148.5</td>
<td>1920.2</td>
<td>1912</td>
<td>97</td>
</tr>
</tbody>
</table>

**[END CEII]**

*This information describes a weakness if the system, exposing a vulnerability of the BPS.*
Attachment E, Northeast Utilities Service Company CEII Non-Disclosure Form

This form can be accessed by clicking on this link NUSCO CEII Non-Disclosure Form

Northeast Utilities Service Company CEII Non-Disclosure Form

CRITICAL ENERGY INFRASTRUCTURE INFORMATION ("CEII")
REQUEST INSTRUCTIONS

The attached form is intended to facilitate your request for information that is classified by Northeast Utilities (NU) as CEII. For your information, the Federal Energy Regulatory Commission ("FERC") has defined CEII as "specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that: (1) relates details about the production, generation, transportation, transmission, or distribution of energy; (2) could be useful to a person in planning an attack on critical infrastructure; (3) is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. 552 (2000); and (4) does not simply give the general location of the critical infrastructure."

The attached form covers discrete requests for information, including participation in limited purpose working groups (e.g., formed to complete a transmission study). For access to the NEPOOL Reliability Committee (RC) and the Planning Advisory Committee (PAC) planning documents, please refer to the Independent System Operator – New England (ISO-NE) website.

In order for NU to consider your request, you must complete, sign, date and return the following forms:

1. CEII Request Form (including identity verification)
2. Non-Disclosure Agreement (unless you are employed by FERC or Northeast Utilities)

Please understand that changes to these documents are not permissible due to the volume of requests we receive and to ensure that all entities are treated fairly and equally.

Each of these forms requires you to identify yourself as: a registered employee of a Governance or Market Participant; an employee of an ISO or RTO; a state agency employee; a federal agency employee; an employee of an electric reliability organization or regional entity; an employee of a transmission owner in this or another region; a consultant for one of the foregoing entities; or “other.”

Please note that these requests are individual and each person within an entity or organization who will access the CEII must complete these forms.

Finally, note that Northeast Utilities will not act upon your request until these steps are completed. When these steps are completed and reviewed, Northeast Utilities will forward the relevant information to you.

PLEASE BE ADVISED THAT THE DISCLOSURE OF CEII TO YOU IS DISCRETIONARY, AND NORTHEAST UTILITIES MAY REJECT YOUR REQUEST FOR ANY REASON.

Any questions regarding this CEII Request Form may be directed to the CEII Coordinator at (888) 456-2424. All correspondence, including the completed forms, should be mailed or faxed to Northeast Utilities CEII Coordinator, Attention: Reliability Compliance Department, 107 Selden St., Berlin, CT, 06037; fax number (860) 665-2805. Completed forms may also be scanned and sent via e-mail to: compliance@nu.com.
CEII NON-DISCLOSURE AGREEMENT

This CEII NON-DISCLOSURE AGREEMENT (the “Agreement”) is made by the undersigned (the “Recipient”) in favor of NORTHEAST UTILITIES SERVICE COMPANY (NUSCO) as agent for one or more of its affiliates, THE CONNECTICUT LIGHT AND POWER COMPANY, WESTERN MASSACHUSETTS ELECTRIC COMPANY, HOLYOKE POWER AND ELECTRIC COMPANY, HOLYOKE WATER POWER COMPANY, AND PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE (collectively, the Company)

WHEREAS, the Recipient has requested that the Company disclose to the Recipient certain information, all or a portion of which has been classified as Critical Energy Infrastructure Information; and

WHEREAS, the Federal Energy Regulatory Commission has defined Critical Energy Infrastructure Information as “specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that: (1) relates details about the production, generation, transportation, transmission, or distribution of energy; (2) could be useful to a person in planning an attack on critical infrastructure; (3) is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. 552 (2000); and (4) does not simply give the general location of the critical infrastructure”;

NOW, THEREFORE, for good and valuable consideration, the receipt and adequacy of which are hereby acknowledged, the Recipient agrees as follows:

1. Definition of CEII. For purposes of this Agreement, “Critical Energy Infrastructure Information” or “CEII” shall mean: (i) all information designated as such by FERC, or the Company, whether furnished before or after the date hereof, whether oral, written or recorded/electronic, and regardless of the manner in which it is furnished; and (ii) all reports, summaries, compilations, analyses, notes or other information which contain such information.

2. Use and Protection of CEII.

(a) All CEII shall be maintained by Recipient in a secure place. Recipients may make copies of CEII, but such copies become CEII and subject to these same procedures. Recipients may make notes of CEII, which shall be treated as CEII if they contain CEII.

(b) Although a Recipient of CEII may use CEII as foundation for advice provided to his or her employer or clients, she may only discuss CEII with or disclose CEII to another Recipient of the identical CEII. A Recipient may check with the Company to determine whether another individual is a Recipient of the identical CEII.

(c) A Recipient will not knowingly use CEII directly or indirectly for an illegal or non-legitimate purpose.

(d) In the event that the Recipient is required to disclose CEII by subpoena, law or other directive of a court, administrative agency or arbitration panel, the Recipient hereby agrees to provide the Company with prompt notice of such request or requirement in order to enable the Company to (i) seek an appropriate protective order or other remedy, (ii) consult with the Recipient with respect to taking steps to resist or narrow the scope of such request or legal process, or (iii) waive compliance, in whole or in part, with the terms of this Agreement. In the event that such protective order or other remedy is not obtained,
or the Company waives compliance with the provisions hereof, the Recipient hereby agrees to furnish only that portion of the CEII which the Recipient’s counsel advises is legally required and to exercise best efforts to obtain assurance that confidential treatment will be accorded such CEII.

3. **Return of CEII.** In the event that the Company, in its sole discretion, so requests, the Recipient will promptly deliver to the Company all CEII, including all copies, reproductions, summaries, compilations, analyses or extracts thereof.

4. **Change in Status.** If the Recipient ceases to be a party or intervenor in the siting proceeding to which the CEII provided hereunder relates, the Company may require the return of the CEII or its destruction.

5. **CEII “on Loan”.** Information provided pursuant to this Agreement is deemed to be on loan and must be returned to the Company upon request. If the Recipient is an employee of a federal or State agency, s/he must note that the information is not the property of the agency and is not subject to Freedom of Information/Public Records acts or similar statutes.

6. **No Warranty.** The CEII is provided "as is" with all faults. In no event shall the Company be liable for the accuracy or completeness of the CEII. The Company shall not have liability to the Recipient, or any other person or entity, for the Recipient’s use of any CEII disclosed pursuant to this Agreement.

7. **Equitable Relief, Audit.** Without prejudice to the rights and remedies otherwise available to the Company, the Company shall be entitled to seek equitable relief by way of injunction or otherwise if the Recipient breaches or threatens to breach any of the provisions of this Agreement. The Company may audit the Recipient’s compliance with this Agreement.

8. **Survival.** The Recipient remains bound by these provisions unless the Company has rescinded it.

9. **No Waiver.** The Recipient understands and agrees that no failure or delay by the Company in exercising any right, power or privilege hereunder shall operate as a waiver thereof, nor shall any single or partial exercise thereof preclude any other or further exercise thereof or the exercise of any right, power or privilege hereunder.

10. **Governing Law.** This Agreement shall be governed by and construed in accordance with the laws of the [State or Commonwealth in which the siting proceeding is pending.]

11. **Assignment Prohibited.** Any assignment of the Recipient’s rights, obligations or duties under this Agreement without the Company’s prior written consent shall be void.

12. **Entire Agreement.** This Agreement contains the entire agreement between the parties concerning the protection of the CEII, and no modification of this Agreement or waiver of the terms and conditions hereof shall be binding upon the parties, unless approved in writing by each of them.

13. **Severability.** If any provision or provisions of this Agreement shall be held to be invalid, illegal or unenforceable, the validity, legality and enforceability of the remaining provisions shall not in any way be affected or impaired thereby.
IN WITNESS WHEREOF, the Recipient has executed this CEII Non-Disclosure Agreement as of the date set forth below.

Signature: __________________________

Name (please print): __________________________

Date: __________________________

Organization: __________________________

Address: __________________________
Transmission Contracts and NU Purchasing

In addition to the Siting and Permitting process, Transmission Contracts and NU Purchasing may require additional non-disclosure agreements from third parties accepting contracted projects that may require or create CEII. If NU Transmission Contracts, Purchasing, or Legal feel it is necessary, the following NDA can be used to ensure additional security.

**CONFIDENTIAL INFRASTRUCTURE INFORMATION
NON-DISCLOSURE AGREEMENT**

This CONFIDENTIAL INFRASTRUCTURE INFORMATION NON-DISCLOSURE AGREEMENT (the "Agreement") is made by the undersigned (the "Recipient") in favor of NORTHEAST UTILITIES SERVICE COMPANY ("NUSCO") as agent for one or more of its affiliates including THE CONNECTICUT LIGHT AND POWER COMPANY, WESTERN MASSACHUSETTS ELECTRIC COMPANY, PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE and YANKEE GAS SERVICES COMPANY (collectively, the "Company").

WHEREAS, the Recipient has requested that the Company disclose or otherwise make available to the Recipient certain confidential infrastructure information or “CII” that may include:

- Critical Infrastructure Information as defined by the Department of Homeland Security (DHS), including any Protected Critical Infrastructure Information ("PCII"), to the extent certified as such by the DHS, pursuant to the Critical Information Act of 2002 (See Final Rule 6 CFR Part 29 – September 1, 2006);
- Critical Energy Infrastructure Information ("CII") as defined by the Federal Energy Regulatory Commission ("FERC") in Section 388.113(c)(1) of the FERC regulations;
- Confidential information regarding critical assets and critical cyber assets which are subject to the North American Electric Reliability Council ("NERC") Critical Infrastructure Protection ("CIP") standards (CIP-002 through CIP-009) pertaining to the reliability and availability of the Bulk Electric System in North America ("Confidential CIP");
- any other infrastructure information designated by the Company as proprietary and confidential, whether furnished before or after the date hereof, whether oral, written or recorded/electronic, and regardless of the manner in which it is furnished; and
- all reports, summaries, compilations, analyses, notes or other information which contain the foregoing information.

WHEREAS, the Company is willing to provide such CII only on the condition that Recipient enters into and executes this Agreement;

NOW, THEREFORE, for good and valuable consideration, the receipt and adequacy of which are hereby acknowledged, the Recipient agrees as follows:

1. **Use and Protection of CII**

   a) All CII shall be maintained by Recipient in a secure place. Recipients may make copies of CII but such copies become CII and subject to these same procedures. Recipients may make notes of CII which shall be treated as CII if they contain CII. Such CII shall be kept confidential by Recipient and its agents, employees, and representatives and shall take appropriate measures to protect Company's CII (including but not limited) to those steps taken to protect the confidential information, data or other tangible or intangible property of its own that the Recipient regards as proprietary or confidential and that is of similar value or importance to the CII disclosed hereunder.
(b) Recipient shall limit disclosure of CII within its organization strictly to persons with a need-to-know and then only after advising such persons as to the confidential and proprietary nature of the CII and obtaining such person’s agreement as to the limitations on use and further disclosure as set forth in this Agreement. Recipient will maintain written records of the persons to whom CII is distributed. Recipient shall indemnify and hold the Company harmless from all liabilities arising from or related to the disclosure of CII in violation of this Agreement by Recipient or by any employee, agent, or other representative of Recipient or by any third party to whom Recipient or any such employee, agent or representative discloses CII in violation of this Agreement.

(c) Although a Recipient of CII may use CII as foundation for advice provided to his or her employer or clients, s/he may only discuss CII with or disclose CII to another Recipient of the identical CII. A Recipient may check with the Company to determine whether another individual is a Recipient of the identical CII.

(d) A Recipient will not knowingly use CII directly or indirectly for an illegal or non-legitimate purpose. Recipient agrees to use the CII solely for purposes expressly requested by the Company.

(e) In the event that the Recipient is required to disclose CII by subpoena, law or other directive of a court, administrative agency or arbitration panel, the Recipient hereby agrees to provide the Company with prompt notice of such request or requirement in order to enable the Company to (i) seek an appropriate protective order or other remedy, (ii) consult with the Recipient with respect to taking steps to resist or narrow the scope of such request or legal process, or (iii) waive compliance, in whole or in part, with the terms of this Agreement. In the event that such protective order or other remedy is not obtained, or the Company waives compliance with the provisions hereof, the Recipient hereby agrees to furnish only that portion of the CII which the Recipient’s counsel advises is legally required and to exercise best efforts to obtain assurance that confidential treatment will be accorded such CII.

2. **Return of CII.** In the event that the Company, in its sole discretion, so requests, the Recipient will promptly deliver to the Company all CII, including all copies, reproductions, summaries, compilations, analyses or extracts thereof.

3. **CII “on Loan.”** CII provided pursuant to this Agreement is deemed to be on loan and must be returned to the Company upon request. If the Recipient is an employee of a federal or State agency, s/he must note that the information is not the property of the agency.

4. **No Warranty.** The CII is provided “as is” with all faults. In no event shall the Company be liable for the accuracy or completeness of the CII. The Company shall not have liability to the Recipient, or any other person or entity, for the Recipient’s use of any CII disclosed pursuant to this Agreement.

5. **Equitable Relief; Audit.** Without prejudice to the rights and remedies otherwise available to the Company, the Company shall be entitled to seek equitable relief by way of injunction or otherwise if the Recipient breaches or threatens to breach any of the provisions of this Agreement. The Company may audit the Recipient’s compliance with this Agreement.

6. **Survival.** The Recipient remains bound by these provisions unless the Company has rescinded them.
7. **No Waiver.** The Recipient understands and agrees that no failure or delay by the Company in exercising any right, power or privilege hereunder shall operate as a waiver thereof, nor shall any single or partial exercise thereof preclude any other or further exercise thereof or the exercise of any right, power or privilege hereunder.

8. **Governing Law.** This Agreement and the rights and duties of the parties hereunder shall be governed by and construed in accordance with the laws of the State of Connecticut without regard to its principles of conflicts of law **provided that** (a) if the CII pertains to Owner’s sites or operations occurring entirely outside of the State of Connecticut then the laws of the State/Commonwealth where the Site is located (or to which the CII pertains) may govern certain aspects of the enforcement of the rights and remedies of Company (including legal process and procedure); and (b) any CII that is CEII is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. 552.

9. **Assignment Prohibited.** Any assignment of the Recipient’s rights, obligations or duties under this Agreement without the Company’s prior written consent shall be void.

10. **Severability.** If any provision or provisions of this Agreement shall be held to be invalid, illegal or unenforceable, the validity, legality and enforceability of the remaining provisions shall not in any way be affected or impaired thereby.

11. **Entire Agreement.** This Agreement contains the entire agreement between the parties concerning the protection of the CII, and no modification of this Agreement or waiver of the terms and conditions hereof shall be binding upon the parties, unless approved in writing by each of them.

IN WITNESS WHEREOF, the Recipient has executed this CII Non-Disclosure Agreement as of the date set forth below. Facsimile and Portable Document Format (PDF) copies of signatures shall be deemed original signatures.

RECIPIENT: __________________________________________

By:

Signature: __________________________________________

Name (please print): __________________________________

Date: ____________________________________________

Organization: Address: ______________________________

3
Attachment F, Northeast Utilities Service Company CEII Identify Verification Form

This form can be accessed by clicking on this link NU CEII Identity Verification Form

Northeast Utilities Service Company CEII Identity Verification Form

Form #: M3-RC-2201.3

The attached form facilitates your request for information that is classified by Northeast Utilities (NU) as CEII. For your information, the Federal Energy Regulatory Commission (“FERC”) has defined CEII as “specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that: (1) relates details about the production, generation, transportation, transmission, or distribution of energy; (2) could be useful to a person in planning an attack on critical infrastructure; (3) is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. 552 (2000); and (4) does not simply give the general location of the critical infrastructure.”

The attached form covers discrete requests for information, including participation in limited purpose working groups (e.g., formed to complete a transmission study). For access to the NEPOOL Reliability Committee (RC) and the Planning Advisory Committee (PAC) planning documents, please refer to the Independent System Operator - New England (ISO-NE) website.

In order for NU to consider your request, you must complete, sign, date and return the following forms:

1. Northeast Utilities Service Company CEII Non-Disclosure Agreement (unless you are employed by FERC or Northeast Utilities)
2. Northeast Utilities Service Company CEII Identity Verification Form (unless you are employed by FERC or Northeast Utilities)

Please understand that changes to these documents are not permissible due to the volume of requests we receive and to ensure that all entities are treated fairly and equally.

Each of these forms requires you to identify yourself as: a registered employee of a Governance or Market Participant; an employee of an ISO or RTO; a state agency employee; a federal agency employee; an employee of an electric reliability organization or regional entity; an employee of a transmission owner in this or another region; a consultant for one of the foregoing entities; or “other.”

Please note that these requests are individual and each person within an entity or organization who will access the CEII must complete these forms.

Finally, note that Northeast Utilities will not act upon your request until these steps are completed. When these steps are completed and reviewed, Northeast Utilities will forward the relevant information to you.

PLEASE BE ADVISED THAT THE DISCLOSURE OF CEII TO YOU IS DISCRETIONARY, AND NORTHEAST UTILITIES MAY REJECT YOUR REQUEST FOR ANY REASON.

Any questions regarding this CEII Request Form may be directed to the CEII Coordinator at (888) 456-2424. All correspondence, including the completed forms, should be mailed or faxed to Northeast Utilities CEII Coordinator, Attention: Reliability Compliance Department, 107 Selden St., Berlin, CT, 06037, fax number (800) 665-2805. Completed forms may also be scanned and sent via e-mail to: compliance@nu.com.
Northeast Utilities Service Company CEII Identity Verification Form

The attached form is facilitates your request for information that is classified by Northeast Utilities (NU) as CEII. For your information, the Federal Energy Regulatory Commission ("FERC") has defined CEII as “specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that: (1) relates details about the production, generation, transportation, transmission, or distribution of energy; (2) could be useful to a person in planning an attack on critical infrastructure; (3) is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. 552 (2000); and (4) does not simply give the general location of the critical infrastructure.”

The attached form covers discrete requests for information, including participation in limited purpose working groups (e.g., formed to complete a transmission study). For access to the NEPOOL Reliability Committee (RC) and the Planning Advisory Committee (PAC) planning documents, please refer to the Independent System Operator – New England (ISO-NE) website.

In order for NU to consider your request, you must complete, sign, date and return the following forms:

1. Northeast Utilities Service Company CEII Non-Disclosure Agreement (unless you are employed by FERC or Northeast Utilities)
2. Northeast Utilities Service Company CEII Identity Verification Form (unless you are employed by FERC or Northeast Utilities)

Please understand that changes to these documents are not permissible due to the volume of requests we receive and to ensure that all entities are treated fairly and equally.

Each of these forms requires you to identify yourself as: a registered employee of a Governance or Market Participant; an employee of an ISO or RTO; a state agency employee; a federal agency employee; an employee of an electric reliability organization or regional entity; an employee of a transmission owner in this or another region; a consultant for one of the foregoing entities; or “other.”

Please note that these requests are individual and each person within an entity or organization who will access the CEII must complete these forms.

Finally, note that Northeast Utilities will not act upon your request until these steps are completed. When these steps are completed and reviewed, Northeast Utilities will forward the relevant information to you.

PLEASE BE ADVISED THAT THE DISCLOSURE OF CEII TO YOU IS DISCRETIONARY, AND NORTHEAST UTILITIES MAY REJECT YOUR REQUEST FOR ANY REASON.

Any questions regarding this CEII Request Form may be directed to the CEII Coordinator at (888) 456-2424. All correspondence, including the completed forms, should be mailed or faxed to Northeast Utilities CEII Coordinator, Attention: Reliability Compliance Department, 107 Selden St., Berlin, CT, 06037, fax number (860) 665-2805. Completed forms may also be scanned and sent via e-mail to: compliance@nu.com.
I acknowledge that the foregoing is true and accurate, and agree to give Northeast Utilities Service Company (NUSCO) immediate notice if any of the foregoing is no longer true. I also consent to NUSCO and its affiliated companies sharing the fact that this request has been made and/or granted, and agree that NUSCO and its parent and affiliated companies shall have no liability to me in connection with this request.

Signature: ___________________________ Date: ___________________________

Name (please print):

Organization:

Title at Organization:

Business Address:

E-mail:

Phone:

Fax: