Board Energy Resources & Customer Services Committee Meeting and Special SMUD Board of Directors Meeting

Date: Wednesday, September 15, 2021

Time: Scheduled to begin at 5:30pm

Location: Virtual Meeting (Online)





AGENDA BOARD ENERGY RESOURCES & CUSTOMER SERVICES COMMITTEE MEETING AND SPECIAL SMUD BOARD OF DIRECTORS MEETING

Wednesday, September 15, 2021 Scheduled to begin at 5:30 p.m.

Zoom Webinar Link: Join SMUD Energy Resources & Customer Services

Committee Meeting Here

Webinar/Meeting ID: 160 792 0359

Passcode: 083381

Phone Dial-in Number: 1-669-254-5252 or 1-833-568-8864 (Toll Free)

In accordance with the Governor's Executive Order N-29-20 and the Emergency Board Meeting Procedures adopted by the SMUD Board of Directors, the regular Board meeting and other public meetings are closed to the public to align with state, local, and federal guidelines and social distancing recommendations for the containment of the coronavirus.

Live video streams and indexed archives of meetings are available at: http://smud.granicus.com/ViewPublisher.php?view_id=16

Members of the public may register to provide verbal comments at an upcoming Board or Committee meeting by emailing a request to speak to PublicComment@smud.org. Please include the date of the meeting, name, and topic or agenda item the requestor wishes to speak on. The request may also be submitted while the meeting is in progress during the standard time for the agenda item or topic. Pre-registration is strongly encouraged by no later than 3:00 p.m. on the day of the meeting.

Members of the public may provide written public comments on a specific agenda item or on items not on the agenda (general public comment) by submitting comments via e-mail. Comments may be submitted to PublicComment@smud.org and will be placed into the record of the meeting.

Members of the public that are listening to or watching the live stream of a Committee meeting and wish to submit written comments on a specific agenda item as it is being heard may submit their comments, limited to 250 words or less, to PublicComment@smud.org, noting the agenda item number in the subject line. The Committee Chair may read comments for items on the agenda into the record, in her discretion, based upon such factors as the length of the agenda or the number of e-mail comments received. General public comment for items not on the agenda will not be read into the record but will be provided to the Board and placed into the record of the Board meeting if it is received within two hours after the meeting ends.

This Committee meeting is noticed as a joint meeting with the Board of Directors for the purpose of compliance with the Brown Act. In order to preserve the function of the Committee as advisory to the Board, members of the Board may attend and participate in the discussions, but no Board action will be taken. The Energy Resources and Customer Services Committee will review, discuss and provide the Committee's recommendation on the following:

DISCUSSION ITEM

1. Rob Lechner Discuss adoption of SMUD's **Utility Security Plan.**

Presentation: 7 minutes Discussion: 8 minutes

INFORMATIONAL ITEMS

2. Public Comment

3. Brandon Rose Summary of Committee Direction.

Discussion: 1 minute

Pursuant to Resolution No. 20-06-08 adopted on June 18, 2020, Emergency Board Meeting Procedures are in effect:

Members of the public may make either a general public comment or comment on a specific agenda item by submitting comments via email. Comments may be submitted to PublicComment@smud.org. Comments will be provided to the Board and placed into the record of the Committee meeting if it is received within two hours after the meeting ends.

Members of the public that are listening or watching the live stream of a Board meeting and wish to comment on a specific agenda item as it is being heard, may submit their comments, limited to 250 words or less, to PublicComment@smud.org. The Board Chair may read the comments into the record, in her discretion, based upon such factors as the length of the agenda or the number of email comments received. Comments will be provided to the Board and placed into the record of the Committee meeting if it is received within two hours after the meeting ends.

Members of the public may register to provide verbal comments at an upcoming Board or Committee meeting by emailing a request to speak to PublicComment@smud.org. Please include the date of the meeting, name, and topic or agenda item the requestor wishes to speak on. The request may also be submitted while the meeting is in progress during the standard time for the agenda item or topic. Pre-registration is strongly encouraged by no later than 3:00 p.m. on the day of the meeting.

ADA Accessibility Procedures: Upon request, SMUD will generally provide appropriate aids and services leading to effective communication for qualified persons with disabilities so that they can participate equally in this virtual meeting. If you need a reasonable auxiliary aid or service for effective communication to participate, please email Toni.Stelling@smud.org, or contact by phone at (916) 732-7143, no later than 48 hours before this virtual meeting.

SSS No.	
CFO 21-009	

BOARD AGENDA ITEM

STAFFING SUMMARY SHEET

Committee Meeting & Date ERCS – 09/15/21
Board Meeting Date September 16, 2021

ТО									ТО			
1.	Rob Lechner				6.							
2.	Jennifer Davidson				7.							
3.	Frankie McDermott			8.							•	
4.	Stephen Clemons			9.	Lega	ı						
5.			,		-		10.	CEO & General Manager				
Consent (Calendar X Yes No If no, schedule a dry run presentation.			Bud	dgeted	х	Yes		No (If no, expla section.)	in in Cost/	Budgeted	
FROM (IPR) DEPARTMENT					MAIL STOP EXT. DATE SENT				DATE SENT			
James Fraser Heath, Safety &				& Secur	ity Ope	ratio	ons		E115	5951	9/3/21	

NARRATIVE:

Requested Action: Discuss adoption of SMUD's Utility Security Plan.

Summary:

In January 2019 the California Public Utilities Commission (CPUC) ordered all electric utilities, including Publicly Owned Electric Utilities (POUs), to conduct risk assessments of their distribution assets and create physical security mitigation plans for priority covered assets. POUs are required to provide the CPUC with notice that an independently reviewed mitigation plan for all covered assets has been adopted by the POU's governing board. The Notice was originally due July 10, 2021, and SMUD notified the CPUC pursuant to the terms of the CPUC order that SMUD would submit its Notice of adoption by October 2021.

Staff completed a risk assessment of all distribution substations not covered by the North American Electric Liability Corporation (NERC) CIP -014 and evaluated the potential risks associated with a successful physical attack on identified covered facilities. All covered facilities have been assessed to either have an alternate source to another distribution substation or the critical customer served by the facility has back-up generation. Staff concluded there are no distribution facilities within SMUD that require additional specific physical security mitigation planning pursuant to the CPUC's order. The Plan reflects staff's assessment, evaluation, and conclusions.

SMUD obtained an independent third-party review of the Plan. SMUD also designated the California Governor's Office of Emergency Services (CalOES) as a validation authority and obtained CalOES' review of the Plan.

Board Policy: SD-6, Safety Leadership

(Number & Title) SD-17, Enterprise Risk Management

Benefits: The presentation will inform the Board of SMUD's Utility Security Plan.

Cost/Budgeted: N/A

Alternatives: SMUD is required to provide the CPUC with notice that an independently reviewed mitigation plan for

all covered assets has been adopted.

Affected Parties: SMUD

Coordination: Executive Office, Board Office, Legal, Security Operations

Presenter: Rob Lechner, Director, Facilities and Security Operations

Additional	Links
------------	-------

SUBJECT SMUD's Utility Security Plan





SUBJEC

PHYSICAL SECURITY PLAN IN SUPPORT OF PROTECTING COVERED DISTRIBUTION FACILITIES

Sacramento Municipal Utility District Utility Security Plan Revision 1.0

Revision Date: 28 July 2021

Authored by:

James Fraser

Physical Security Program Manager

Approved by:

Rob Lechner

Director, Facilities and Security Operations

R.15-06-009



PHYSICAL SECURITY OF ELECTRIC INFRASTRUCTURE

SUBJECT

PHYSICAL SECURITY PLAN IN SUPPORT OF PROTECTING COVERED DISTRIBUTION FACILITIES

TABLE OF CONTENTS

1.0	PURPOSE	3
2.0	SCOPE	3
3.0	RESPONSIBILITIES	3
4.0	BACKGROUND	4
5.0	IDENTIFICATION OF COVERED FACILITIES	6
6.0	RISK ASSESSMENT	11
7.0	NARRATIVE DESCRIPTIONS FOR SMUD SECURITY PLAN	12



SUBJECT

PHYSICAL SECURITY PLAN IN SUPPORT OF PROTECTING COVERED DISTRIBUTION FACILITIES

1.0 - PURPOSE

This document establishes SMUD's fulfillment of the requirements set forth by the California Public Utilities Commission (CPUC) Decision (D.) 19-01-018 adopted in Rulemaking (R.) 15-06-009 – Order Instituting Rulemaking Regarding Policies, Procedures and Rules for Regulation of Physical Security for the Electric Supply Facilities of Electrical Corporations.

2.0 - SCOPE

This document contains the summary findings from an assessment (Critical Infrastructure Assessment May 2021) conducted on SMUD Distribution Assets throughout the SMUD service territory applicable to the screening factors set forth in the Joint IOU/POU Straw Proposal to determine if a facility is a "Covered Distribution Facility" and summarized in section 5. It represents SMUD's compliance with the CPUC's Safety and Enforcement Division's Six-step Security Plan Process described in D. 19-01-018.

3.0 - RESPONSIBILITIES

3.1 Director, Facilities and Security Operations

Primary owner and responsible for the coordination, development, and implementation of the Security Plan.

3.2 Distribution Planning Manager

Responsible for determining the status of SMUD distribution facilities and their applicability to CPUC D.19-01-018.

3.3 Sacramento Power Academy Manager

Responsible for the Workforce Training and Retention Program portion of the Security Plan that articulates SMUD's ability to comply with the CPUC D.19-01-018.

3.4 Transmission and Distribution Maintenance Planning Manager

Responsible for the Asset Management Program for SMUD.

3.5 Physical Security Program Manager

Responsible for the content of the Security Plan and its adherence to CPUC D.19-01-018.

PHYSICAL SECURITY OF

ELECTRIC INFRASTRUCTURE

R.15-06-009

SUBJECT

PHYSICAL SECURITY PLAN IN SUPPORT OF PROTECTING COVERED DISTRIBUTION FACILITIES

4.0 BACKGROUND

On April 16, 2013, one or more individuals attacked equipment located within Pacific Gas and Electric Company's (PG&E) Metcalf Transmission Substation, ultimately damaging 17 transformers. These individuals also cut nearby fiber-optic telecommunication cables owned by AT&T. In response to the attack, the Federal Energy Regulatory Commission (FERC) directed the North American Electric Reliability Corporation (NERC) to develop new physical security requirements, resulting in the creation of CIP-014.

At the state level, Senator Jerry Hill authored SB 699 (2014), directing the CPUC to "consider adopting rules to address the physical security risks to the distribution systems of electrical corporations." In response to SB 699, the CPUC's Safety and Enforcement Division, Risk Assessment and Safety Advisory Section (RASA) prepared a white paper proposing a new requirement for investor-owned utilities (IOUs) and publicly owned utilities (POUs) to develop security plans that would identify security risks to their distribution and transmission systems and propose methods to mitigate those risks. The CPUC hosted a series of workshops to better understand the state of utility physical security protections and to seek input on refining their proposal.

In order to support a statewide improvement of how utilities address distribution level physical security risks, the California Municipal Utilities Association (CMUA), which is the statewide trade association for POUs, coordinated with the state's IOUs to develop a comprehensive Straw Proposal1 (Joint IOU/POU Straw Proposal) for a process to identify at-risk facilities and, if necessary, develop physical security mitigation plans. As a member of CMUA, SMUD staff participated in the development of the Joint IOU/POU Straw Proposal through a CMUA working group as well as through direct meetings with the IOUs. The Joint POU/IOU Straw Proposal set out a process for the following: (1) identifying if the utility has any high priority distribution facilities; (2) evaluating the potential risks to those high priority distribution facilities; (3) for the distribution facilities where the identified risks are not effectively mitigated through existing resilience/security measures, developing a mitigation plan; (4) obtaining third party reviews of the mitigation plans; (5) adopting a document retention policy; (6) ensuring a review process established by the POU governing board; and (7) implementing information sharing protocols.

¹ Straw Proposal available at:

SUBJECT

PHYSICAL SECURITY PLAN IN SUPPORT OF PROTECTING COVERED DISTRIBUTION FACILITIES

RASA filed a response 2 to the Joint IOU/POU Straw Proposal that recommended various modifications and clarifications, including a six-step process. Additionally, RASA recommended that the utility mitigation plans include: (1) an assessment of supply chain vulnerabilities; (2) training programs for law enforcement and utility staff to improve communication during physical security events; and (3) an assessment of any nearby communication utility infrastructure that supports priority distribution substations.

In early 2019, the CPUC approved Decision (D.) 19-01-018, which adopted the Joint IOU/POU Straw Proposal as modified by the RASA proposal, with additional clarifications and guidance. D.19-01-018 clarified that where there is a conflict between the Straw Proposal and the RASA proposal, then it is the rule in the RASA proposal that controls.3

D.19-01-018 asserted that the POUs should utilize the Utility Security Plan process described therein. SMUD is following the process and issuing this report at this time to reflect its existing commitment to safety and to protecting its ratepayers' investment by taking reasonable and cost-effective measures in an effort to safeguard key assets of its distribution system.

Physical Security Principles

The Joint IOU/POU Straw Proposal seeks to support the creation of a risk management approach toward distribution system physical security, with appropriate considerations of resiliency, impact, and cost. To accomplish this risk-based approach, the Joint IOU/POU Straw Proposal identifies several principles to guide the development of each individual utility's program. These principles are the following:

- 1. Distribution systems are not subject to the same physical security risks and associated consequences, including threats of physical attack by terrorists, as the transmission system.
- 2. Distribution utilities will not be able to eliminate the risk of a physical attack occurring, but certain actions can be taken to reduce the risk or consequences, or both, of a significant attack.
- 3. A one-size-fits-all standard or rule will not work. Distribution utilities should have the flexibility to address physical security risks in a manner that works best

 $\frac{https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/Safety/Risk\ Assessment/physicalsecurity/Final%20Staff%20Recommendation%20for%20Commission%20Consideration%20010318.pdf.$

² RASA Response available at:

³ D.19-01-018 at 43, footnote 58 ("Should there be any question of which shall predominate should there be any incongruity or conflict between a utility or SED RASA recommended rule, the SED RASA rule shall apply.").

R.15-06-009

PHYSICAL SECURITY OF ELECTRIC INFRASTRUCTURE

SUBJECT

PHYSICAL SECURITY PLAN IN SUPPORT OF PROTECTING COVERED DISTRIBUTION FACILITIES

for their systems and unique situations, consistent with a risk management approach.

- 4. Protecting the distribution system should consider both physical security protection and operational resiliency or redundancy.
- 5. The focus should not be on all Distribution Facilities, but only those that risk dictates would require additional measures.
- 6. Planning and coordination with the appropriate federal and state regulatory and law enforcement authorities will help prepare for attacks on the electrical distribution system and thereby help reduce or mitigate the potential consequences of such attacks.

5.0 IDENTIFICATION OF COVERED FACILITIES

Ensuring the safety of its facilities is a top priority for SMUD, and SMUD prioritizes safety in all aspects of its design, operation, and maintenance practices.

SMUD recognizes the importance of securing the safety and reliability of its electric system and, therefore, SMUD voluntarily participated in the California Public Utilities Commission's (CPUC) Physical Security proceeding and has undertaken this assessment and documentation consistent with CPUC Decision (D.) 19-01-018.

Distribution System Description:

SMUD's main distribution system starts with our 69kV system that serves as the high voltage source to our 69kV/12kV substations. Typical transformer sizes at these substations are 20MVA units. In some of our rural areas these units will be smaller, and a common size transformer will be 6.25MVA or 12MVA. There is a small pocket of 69kV/4kV substations which is currently under a multi-year voltage conversion effort to convert this area to the 12kV distribution system. In our downtown area the distribution system is 21kV and is derived from several 115kV/21kV substations. Also serving downtown is our Secondary Network system which is served from 12kV system and derived from two 115kV/12kV substations. Our larger load customers are served by dedicated substations (69kV/12kV, 69kV/4kV) with some taking 69kV service through substations they own and maintain.

The distribution system is planned to be able to serve load under normal configuration and under what we call N-1 situation. N-1 is looking at the failure loss of a single major distribution component. This is typically the loss of a distribution substation transformer. In order to ensure N-1 solutions, there will be several circuit ties to adjacent substations



SUBJECT

PHYSICAL SECURITY PLAN IN SUPPORT OF PROTECTING COVERED DISTRIBUTION FACILITIES

that our Operations personnel can rely on to field switch the load during such an emergency event and restore power to customers initially impacted by the N-1 event.

SMUD's Distribution Summary:

- Service territory covers over 900 square miles
- Serves over 630,000 customers
- 10,500 circuit miles of distribution lines
- 212 distribution substations, including dedicated Customer substations



Identification Assessment:

SMUD has identified the distribution facilities in its service territory that are subject to its control that meet the definition of a "Covered Distribution Facility" set forth in D.19-01-018. In performing this identification analysis, SMUD used the seven factors identified in the Joint IOU/POU Straw Proposal and assessed all distribution level facilities that are subject to its exclusive control, or if the facility is jointly owned, the joint ownership agreement identifies SMUD as the entity responsible for operation and maintenance. The specific types of facilities include distribution substations, line transformers and basic ancillary equipment that are required to provide electrical service such as poles and wires.

The seven screening factors set forth in the Joint IOU/POU Straw Proposal to determine if a facility is a "Covered Distribution Facility" are set forth below. Some factors require additional definitions and/or clarifications in order to be applied to SMUD's facilities. The following Table reflects the Joint IOU/POU Straw Proposal's Factors as clarified by SMUD.

Factor	Joint IOU/POU Straw Proposal Description	Additional Clarification
1	Distribution Facility necessary for crank path, black start or capability essential to the restoration of regional electricity service that are not subject to the California Independent System Operator's (CAISO) operational control and/or subject to North American Electric Reliability Corporation (NERC) Reliability Standard CIP-014-2 or its successors	No additional clarification.



SUBJECT

PHYSICAL SECURITY PLAN IN SUPPORT OF PROTECTING COVERED DISTRIBUTION FACILITIES

	Distribution Easility that is the primary secures	No additional clarification.
2	Distribution Facility that is the primary source of electrical service to a military installation essential to national security and/or emergency response services (may include certain airfields, command centers, weapons stations, emergency supply depots)	No additional clarification.
3	Distribution Facility that serves installations necessary for the provision of regional drinking water supplies and wastewater services (may include certain aqueducts, well fields, groundwater pumps, and treatment plants)	An installation provides "regional drinking water supplies and wastewater services" if it is the primary source of drinking water supply or wastewater services for over 40,000 customer accounts for an area with a population of over 100,000.
4	Distribution Facility that serves a regional public safety establishment (may include County Emergency Operations Centers; county sheriff's department and major city police department headquarters; major state and county fire service headquarters; county jails and state and federal prisons; and 911 dispatch centers)	[POU] defines "regional public safety establishment" as any of the following: (1) Headquarters of a major police or fire department serving 1.5 million population with at least 1,000 sworn officers; (2) County Sheriff's Department Headquarters; (3) County Emergency Operations Center; (4) County/State Fire headquarters; (5) a California State Prison; (5) a United States Penitentiary; or (6) a Federal Correctional Institute.
5	Distribution Facility that serves a major transportation facility (may include International Airport, Mega Seaport, other air traffic control center, and international border crossing)	In addition to the facilities listed in the Joint IOU/POU Straw Proposal, [POU] defines a "major transportation facility" as any transportation facility that has (1) an average of 600 or more flights per day; or (2) over 50,000 passengers arriving or departing per day.
6	Distribution Facility that serves as a Level 1 Trauma Center as designated by the Office of Statewide Health Planning and Development	No additional clarification.
7	Distribution Facility that serves over 60,000 meters	No additional clarification.

Based on this scope, SMUD identified 314 facilities for further analysis. Of these, 18 locations fall within one of the Covered Distribution Facility categories listed above. SMUD evaluated the potential risks associated with a successful physical attack on these Covered Distribution Facilities at these 18 locations and whether existing grid resiliency requirements for customer-owned back-up generation and/or other physical security measures appropriate mitigated the identified risks. All 18 locations have been



PHYSICAL SECURITY OF ELECTRIC INFRASTRUCTURE R.15-06-009

SUBJECT

PHYSICAL SECURITY PLAN IN SUPPORT OF PROTECTING COVERED DISTRIBUTION FACILITIES

assessed to either have an alternate source to another distribution substation or the critical customer has back-up generation, the conclusion is there are no distribution facilities within SMUD that require a specific physical security mitigation plan pursuant to D.19-01-018.

The following tables summarizes the results of SMUD's analysis.

Table 1 - Distribution Facility necessary for crank path, black start or capability essential to the restoration of regional electricity service that are not subject to the California Independent System Operator's (CAISO) operational control and/or subject to North American Electric Reliability Corporation (NERC) Reliability Standard CIP-014-2 or its successors

Facility Name	Location – Main Street	Primary Distribution Substation Source	Alternate Distribution Substation Source	If no Alternate Distribution source capable to pick up Critical Facility, do they have back-up generator?
None	N/A	N/A	N/A	N/A

Table 2 - Military installation essential to national security and/or emergency response services (may include certain airfields, command centers, weapons stations, emergency supply depots)

Facility Name	Location – Main Street	Primary Distribution Substation Source	Alternate Distribution Substation Source	If no Alternate Distribution source capable to pick up Critical Facility, do they have back-up generator?
None	N/A	N/A	N/A	N/A



SUBJECT

PHYSICAL SECURITY PLAN IN SUPPORT OF PROTECTING COVERED DISTRIBUTION FACILITIES

Table 3 - Installations necessary for the provision of regional drinking water supplies and wastewater services for over 40,000 customer accounts for an area with a population of over 100,000

Facility Name	Location – Main Street	Primary Distribution Substation Source	Alternate Distribution Substation Source	If no Alternate Distribution source capable to pick up Critical Facility, do they have back-up generator?
Confidential data maintained by SMUD Security Operations.				

Table 4 - Distribution Facility that serves a regional public safety establishment (may include County Emergency Operations Centers; county sheriff's department and major city police department headquarters; major state and county fire service headquarters; county jails and state and federal prisons; and 911 dispatch centers)

Facility Name	Location – Main Street	Primary Distribution Substation Source	Alternate Distribution Substation Source	If no Alternate Distribution source capable to pick up Critical Facility, do they have back-up generator?
Confidential data maintained by SMUD Security Operations.				

Table 5 - Distribution Facility that serves a major transportation facility (may include International Airport, Mega Seaport, other air traffic control center, and international border crossing

Facility Name	Location – Main Street	Primary Distribution Substation Source	Alternate Distribution Substation Source	If no Alternate Distribution source capable to pick up Critical Facility, do they have back-up
				generator?

PHYSICAL SECURITY OF ELECTRIC INFRASTRUCTURE R.15-06-009

SUBJECT

PHYSICAL SECURITY PLAN IN SUPPORT OF PROTECTING COVERED DISTRIBUTION FACILITIES

Confidential data		
maintained by		
Confidential data		
maintained by		
SMUD Security		
Operations.		

Table 6 - Distribution Facility that serves as a Level 1 Trauma Center as designated by the Office of Statewide Health Planning and Development

Facility Name	Location – Main Street	Primary Distribution Substation Source	Alternate Distribution Substation Source	If no Alternate Distribution source capable to pick up Critical Facility, do they have back-up generator?
Confidential data maintained by SMUD Security Operations.				

Table 7 - Distribution Facility that serves over 60,000 meters

Facility Name	Location – Main Street	Primary Distribution Substation Source	Alternate Distribution Substation Source	If no Alternate Distribution source capable to pick up Critical Facility, do they have back-up generator?
None	N/A	N/A	N/A	N/A

6.0 RISK ASSESSMENT

For purpose of this analysis, a physical attack is limited to the following: (1) theft; (2) vandalism; and (3) discharge of a firearm. A "successful physical attack" is limited to circumstances where a theft, vandalism, and/or the discharge of a firearm has directly led to the failure of any elements of the Covered Distribution Facility that are necessary to provide uninterrupted service to the load served by the Covered Distribution Facilities identified above. In order to perform this risk analysis, SMUD evaluated the relative risk that (1) a physical attack on a Covered Distribution Facility will be successful



SUBJECT

PHYSICAL SECURITY PLAN IN SUPPORT OF PROTECTING COVERED DISTRIBUTION FACILITIES

considering the protective measures in place; or (2) that the impacts of a successful attack will be mitigated due to resiliency and other measures in place.

Based on the foregoing, the process described in the Joint IOU/POU Straw Proposal, and the direction provided in D.19-01-018, in addition to an internal evaluation, SMUD has determined that existing programs and measures effectively mitigate the effects of a successful physical attack for each of the Covered Distribution Facilities. Thus, there are no Covered Distribution Facilities that require additional risk assessment or distinct Mitigation Plan under the process set forth in D.19-01-018.

7.0 NARRATIVE DESCRIPTIONS FOR SMUD SECURITY PLAN

A. Asset Management Program

SMUD has developed an Asset Health Index (AHI) program to maintain reliability of power transformers and circuit breakers. The program leverages information pertaining to location, manufacturer, model, type, year of manufacture and the condition of the asset to identify and develop an asset strategy for the system. The strategy drives the plan and quantity for spare equipment; as well as identifying equipment requiring focused attention for maintenance or replacement.

SMUD maintains spare quantities for Distribution Substation Transformers to anticipate upcoming replacements and considers historical lead time for manufacturers to deliver the transformers. SMUD also monitors the health of distribution substation transformers and manufacturer lead times annually to adjust the spare quantities as needed.

B. Workforce Training and Retention Program -

SMUD has a robust skilled trades apprenticeship program. There are currently 12 apprenticeship programs including Lineworker, Electrician, Cable Splicer, Meter Technician, Telecom Technician, and several more. Most of SMUD's apprenticeships are California State Department of Apprenticeship Standards and US Department of Labor certified. These 3-to-4-year apprenticeship programs provide employees with the skills, training, mentorship, and support needed to become skilled trades professionals, ultimately leading to extensive careers at SMUD and in the utility industry. Apprentice positions are filled on an as needed basis; typically, there are a host of apprentices in the training pipeline developing their skills and preparing for journey level positions. At SMUD there are currently 51 apprentices, all of which are at various points in their apprenticeship. Apprenticeship training includes: Night School, On-the-Job Training, advancement or step-tests, and annual safety/regulatory training. Formal training



SUBJECT

PHYSICAL SECURITY PLAN IN SUPPORT OF PROTECTING COVERED DISTRIBUTION FACILITIES

programs coupled with competitive salaries ensure retention of SMUD's highly qualified skilled trades professionals. Each skilled trade department within SMUD includes a full scheduling staff that supports the planning of our skilled trades crews' time and efforts. These scheduling personnel, coupled with SMUD's warehouse staff, ensure that skilled trades professionals are sufficiently staffed to meet long, and short-term work needs throughout SMUD's service territory. SMUD utilizes, under agreement with our labor union partners, overtime and on-call scheduling to ensure all needs are met.

SMUD is a member of the California Utilities Emergency Association (CEUA). Through the CEUA SMUD participates in joint critical infrastructure planning mitigation, training, exercises, and education. A key component of the CEUA is a Mutual Assistance Agreement among members of the CEUA. The CEUA Mutual Assistance Agreement provides opportunities and a vehicle for member utilities to provide emergency repair and restoration to critical infrastructure services, systems and facilities. SMUD has both offered and received support from our utility colleagues and is prepared to do so again in the future as needed.

C. <u>Preventative Maintenance Plan</u>

SMUD currently does not employ security systems for the distribution assets. Additionally, due to the conclusions reached during SMUD's identification and assessment of its facilities as described in this Plan, SMUD does not currently anticipate systems will be employed in the future that will require a preventative maintenance plan.

D. Independent Review

SMUD has submitted this documentation of its identification process, risk assessment and conclusions to a qualified third party for independent review. SMUD selected as its third-party reviewer, HDR Inc. of Folsom, CA ("Reviewer"). Reviewer is not part of or otherwise affiliated with SMUD and has the appropriate expertise as follows: evaluators hold accreditations from nationally-recognized security professional organizations.

The qualified third-party reviewer issued an evaluation that the plan in its current state is compliant with the intent of the CPUC directive. This utility security plan documentation addresses any identified deficiencies or recommendations or documents the reasons why any recommendations were not adopted. The combination of this document, the non-confidential conclusions of the qualified third-party reviewer, and SMUD's responses to the qualified third-party review will constitute SMUD's Utility Security Plan.



PHYSICAL SECURITY OF ELECTRIC INFRASTRUCTURE R.15-06-009

SUBJECT

PHYSICAL SECURITY PLAN IN SUPPORT OF PROTECTING COVERED DISTRIBUTION FACILITIES

E. Validation

SMUD submitted its Utility Security Plan to a qualified authority for review. The California Office of Emergency Services, Homeland Security Division, provided additional feedback and evaluation of SMUD's Utility Security Plan and, to the extent that this entity is authorized, such entity deems the Utility Security Plan as adequate.

F. Adoption

SMUD's Board of Directors adopted the Utility Security Plan at its duly noticed public meeting on September 15th, 2021, by Resolution 21-___.

SMUD will review and update its Utility Security Plan as appropriate and as necessary to preserve plan integrity, no less often than once every five years.

SSS No.		
BOD 2021-003		

BOARD AGENDA ITEM

STAFFING SUMMARY SHEET

Committee Meeting & Date
ERCS 2021
Board Meeting Date
N/A

Page 0

			-										
то										ТО			
1.	Stephen Cl	Clemons								•			
2.	Frankie Mo	Dermott									4 · · · · · · · · · · · · · · · · · · ·		-
3.										•			
4.	_					9.	Legal	l					
5.						10.	CEO & General Manager						
Consent (Calendar	Yes	Yes x No If no, schedule a dry run Budgeted Yes				Yes		No (If no, explain in Cost/Budgeted section.)				
	Rose / Donna	Lofton			DEPARTMENT Board Office		I I I			DATE SENT 12/22/20			
NARRATI	VE: ested Action:				committee direction								
Summary: During a Board discussion at the January 2 opportunity to do a wrap up period at the member suggestions and requests that we Board. The Committee Chair will summ presentations for this meeting. Board Policy: GP-4 Agenda Planning states the Board achieve.				ere made narize I	e at the Board mocus on	me nem	eting in the second sec	n ar que ts tl	n effort to make sts that come one Board wants	e clear the out of the sthe org	ne will of the e committee ganization to		
	Benefits: Having an agendized opportunity to summarize the Board's requests and suggestions that arise dur the committee meeting will help clarify what the will of the Board.						arise during						
Co	st/Budgeted:	N/A											
	Alternatives: Not summarize the Board's requests at this meeting.												
Affe	Affected Parties: Board of Directors and Executive Staff												
C	Coordination:	Donna	Loft	ton, Special	Assistant to the B	Board							
	Presenter: Brandon Rose, ERCS Committee Chair												

Additional Links:		

SUBJECT Summary of Committee Direction ITEM NO. (FOR LEGAL USE ONLY)

ITEMS SUBMITTED AFTER DEADLINE WILL BE POSTPONED UNTIL NEXT MEETING.

SMUD-1516 1/16 Forms Management