

Subject: Rulemaking - CEII (Critical Energy Infrastructure Information)

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All -

I'm following up on today's discussion of CEII and inclusion of transmission maps in an application and in notices. There was no specific information regarding CEII categories at the meeting, so please see attached CEII definition from the FERC website, and this definition from MISO's Non-Disclosure Agreement, also attached, which should clarify the status of transmission maps:

1. Definitions - For purposes of these provisions:

a. The term "CEII" shall include 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. Narratives such as the descriptions of facilities and processes are generally not CEII unless they describe specific engineering and design details of critical infrastructure.

Particularly given 1(a)(4), and that a map would "simply give the general location of the critical infrastructure" and that it does not "describe specific engineering and design details of critical infrastructure," it is apparent that transmission maps are not CEII.

Maps of the surrounding transmission system should be included in applications and notices as proposed by Commission staff. System maps are a crucial part of a transmission proceeding because, as we say in transmission, "it's all connected," and without a system map, it's impossible for parties, agencies and landowners to visualize the plan and how the proposed infrastructure fits into the whole. Due to Minnesota's non-proliferation policy, it's also important information for notices because it will aid landowners' assessment of their risk and whether or not to participate in a given docket.

Carol A. Overland

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"Our lives begin to end the day we become silent about the things that matter." Dr. Martin Luther King, Jr.

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— Attachments: —

FERC_ CEII - Related Document Classes.pdf

34.1 KB

MISO-CEII NDA.pdf

22.0 KB