

**To:** NERC Board of Trustees (BOT)  
**From:** Thomas J. Galloway, NATF President and CEO   
**Date:** January 20, 2020  
**Subject:** NATF Policy Input to the NERC BOT (February 2020): EMP Strategic Recommendations

The North American Transmission Forum (the “NATF”) appreciates the opportunity to provide policy input on electromagnetic pulse (EMP) strategic recommendations.

## Summary Input

NATF’s policy input remains consistent with the input previously provided informally to NERC staff and the EMP Task Force. Specifically:

- Implementation of EMP recommendations needs to proceed in a disciplined and methodical manner, with careful consideration of proper sequencing
- EMP recommendations should be implemented holistically with respect to resiliency overall, not narrowly through an EMP-centric lens
- NERC can serve a useful convening and organizing function but should make full use of the work that has already been completed or is underway

## Full Input

### Policy Priorities

Policy priority #1 indicates that the EMP Task Force should establish performance expectations for the BPS regarding a predefined EMP event. Significant work remains to characterize the nature of threat, determine system impact, and develop mitigations. As suggested in our previous input, we believe that this work is best approached via a disciplined framework that considers prerequisites.

Policy priority #2 indicates the EMP Task Force should develop guidance for the electric industry on interdependent utility sector coordination related to an EMP event. Significant work on this front has already been completed or is under development by the Electric Subsector Coordinating Council (ESCC) and the NATF (e.g., grid security emergencies). Those activities should be reviewed in detail and leveraged before developing new guidance.

Similarly, policy priority #3 indicates the ERO should develop educational materials about EMP and related impacts. The Electric Power Research Institute (EPRI) has an extensive body of research and educational materials that could be leveraged in this area.

### Vulnerability Assessments and Mitigation Guidelines

EPRI and the NATF can both contribute significantly on vulnerability assessments and related mitigation practices. There is already a body of established work and ongoing activities on both these fronts.

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## Response and Recovery

EMP is one of the four initiating event types for the declaration of a grid security emergency. The ESCC, NATF, Department of Energy, and trade organizations have been actively engaged on this front for about two years. It would be important to leverage that work to help reduce the potential for misalignment or duplicative effort.

cc: NATF Board: E. Seidler, J. Bladow  
NATF Staff: Keels, Carter, Aldred, Underwood