

Federal Energy Regulatory Commission  
Washington, DC 20426

AUG 24 2018

Re: Freedom of Information Act  
Appeal, FOIA No. FY18-75

**VIA E-MAIL AND CERTIFIED MAIL**

Michael Mabec

[REDACTED]

[REDACTED]

CivilDefenseBook@gmail.com

Dear Mr. Mabec:

This letter concerns your June 16, 2018 appeal pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552 and the Federal Energy Regulatory Commission's (Commission or FERC) FOIA regulations, 18 C.F.R. § 388.110 (2018). You appealed the decision issued on May 25, 2018 by Leonard M. Tao, Director of the Office of External Affairs (Director), which withheld the requested documents under FOIA Exemptions 3 and 7(F).

By letter dated August 2, 2018, General Counsel James P. Danly granted in part, and denied in part your appeal and determined to release the documents in redacted form. The General Counsel's decision also provided notice to the submitter that parts of the requested documents would be released no sooner than five (5) calendar days after the issuance of his decision pursuant to 18 C.F.R. § 388.112(e). Accordingly, the redacted versions of the documents are enclosed.

Sincerely,



Charles A. Beamon  
Associate General Counsel  
General & Administrative Law

Enclosures

**David Ortiz**

---

**From:** Robert Chambers  
**Sent:** Friday, March 30, 2018 12:00 PM  
**To:** David Ortiz; [REDACTED]; Mark Hegerle; Olutayo Oyelade [REDACTED]  
[REDACTED]  
**Cc:** Loye Hull; [REDACTED]  
**Subject:** FW: NP18-7 questions

FYI...

**From:** Robert Chambers  
**Sent:** Friday, March 30, 2018 11:58 AM  
**To:** 'Leigh Anne Faugust' <Leigh.Faugust@nerc.net>  
**Cc:** Ed Kichline (Ed.Kichline@nerc.net) <Ed.Kichline@nerc.net>; Loye Hull <loye.hull@ferc.gov>; [REDACTED]  
[REDACTED]  
**Subject:** NP18-7 questions

We have some questions regarding the full NOP, NP18-7:

Redacted pursuant to FOIA Exemptions 3 and 7

**Risk Analysis**

[REDACTED]

[REDACTED]

[REDACTED]

- The Stipulated Incident Facts state [REDACTED]  
[REDACTED]

[REDACTED]

- [REDACTED]  
[REDACTED]

Mitigation of Risk

Redacted pursuant to FOIA Exemptions 3 and 7

In the URE mitigation plan, the plan detail section states [REDACTED]

The Stipulated Incident Facts state [REDACTED]

Name (@pge.com), [REDACTED]

Domain

- [REDACTED]
- If so, please describe and explain the analysis performed and the detailed results.

Please provide your response on or before April 16, 2018.

Thank you,

**Bob Chambers**  
**Manager – Security Group 1**  
Federal Energy Regulatory Commission  
Office of Electric Reliability (OER)  
Division of Reliability Standards and Security  
301-665-1606  
[robert.chambers@ferc.gov](mailto:robert.chambers@ferc.gov)

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**From:** Robert Chambers  
**To:** Cynthia Pointer  
**Cc:** Kal Ayoub (kal.ayoub@ferc.gov)  
**Subject:** FW: NP18-7 questions  
**Date:** Thursday, April 05, 2018 5:09:00 PM

---

FYI...

Redacted pursuant to FOIA Exemption 6

**From:** Robert Chambers  
**Sent:** Monday, April 02, 2018 7:43 AM  
**To:** 'Ed Kichline' <Ed.Kichline@nerc.net>; Leigh Anne Faugust <Leigh.Faugust@nerc.net>  
**Cc:** Loye Hull <loye.hull@ferc.gov>; [REDACTED]  
**Subject:** RE: NP13-7 questions

Good morning Ed,

If that is possible in the future, we will let you know...

**Bob Chambers**  
**Manager – Security Group 1**  
Federal Energy Regulatory Commission  
Office of Electric Reliability (OER)  
Division of Reliability Standards and Security  
301-665-1606  
[robert.chambers@ferc.gov](mailto:robert.chambers@ferc.gov)

**From:** Ed Kichline [<mailto:Ed.Kichline@nerc.net>]  
**Sent:** Friday, March 30, 2018 1:28 PM  
**To:** Robert Chambers <[Robert.Chambers@ferc.gov](mailto:Robert.Chambers@ferc.gov)>; Leigh Anne Faugust <[Leigh.Faugust@nerc.net](mailto:Leigh.Faugust@nerc.net)>  
**Cc:** Loye Hull <[Loye.Hull@ferc.gov](mailto:Loye.Hull@ferc.gov)>; [REDACTED]  
**Subject:** RE: NP18-7 questions

Bob,

We will send these questions to WECC to start working along with the registered entity on the responses.

Loye had indicated in early March that there might be questions on the Full NOP. If possible in future months, we would appreciate if you could let us know that it is likely the Commission will extend its period for review prior to issuance of the Commission's Notice. That can help us keep the Regional Entity, the registered entity, and our management informed and result in less alarm when there is a Notice of Further Review.

Thank you,

Ed

---

**Ed Kichline**

**Senior Counsel and Director of Enforcement Oversight**

North American Electric Reliability Corporation

1325 G Street NW, Suite 600

Washington, DC 20005

202-400-3025 office | 917-754-3202 cell

[ed.kichline@nerc.net](mailto:ed.kichline@nerc.net)

[Twitter @NERC\\_Official](#) | [LinkedIn](#)

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Redacted pursuant to FOIA Exemption 6

**From:** Robert Chambers [<mailto:Robert.Chambers@ferc.gov>]

**Sent:** Friday, March 30, 2018 11:58 AM

**To:** Leigh Anne Faugust <[Leigh.Faugust@nerc.net](mailto:Leigh.Faugust@nerc.net)>

**Cc:** Ed Kichline <[Ed.Kichline@nerc.net](mailto:Ed.Kichline@nerc.net)>; Lyle Hull <[Lyle.Hull@ferc.gov](mailto:Lyle.Hull@ferc.gov)>; [REDACTED]

**Subject:** NP18-7 questions

We have some questions regarding the full NOP, NP18-7:

Redacted pursuant to FOIA Exemptions 3 and 7

**Risk Analysis**

[REDACTED]

[REDACTED]

[REDACTED]

- The Stipulated Incident Facts state [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

■ [REDACTED]  
[REDACTED]

■ [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Mitigation of Risk**

In the URE mitigation plan, the plan detail section states [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

■ [REDACTED]  
[REDACTED]

The Stipulated Incident Facts state [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] *Domain Name (@pge.com)* [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

■ [REDACTED]  
[REDACTED]  
[REDACTED]



- If so, please describe and explain the analysis performed and the detailed results.

- [REDACTED]

- [REDACTED]

- [REDACTED]

Please provide your response on or before April 16, 2018.

Thank you,

**Bob Chambers**  
**Manager – Security Group 1**  
Federal Energy Regulatory Commission  
Office of Electric Reliability (OER)  
Division of Reliability Standards and Security  
301-665-1606  
[robert.chambers@ferc.gov](mailto:robert.chambers@ferc.gov)

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**FYI...**

We have some questions regarding the full NOP, NP18-7:

Redacted pursuant to FOIA Exemptions 3 and 7

\_\_\_\_\_

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

\_\_\_\_\_

- The Stipulated Incident Facts state [REDACTED]

\_\_\_\_\_

1 [REDACTED]

[REDACTED]  
[REDACTED]?

**Mitigation of Risk**

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

■ [REDACTED]  
[REDACTED]  
[REDACTED]

■ [REDACTED]  
[REDACTED]

The Stipulated Incident Facts state

[REDACTED]  
[REDACTED]  
[REDACTED] *Domain Name (@pge.com),* [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

• [REDACTED]  
[REDACTED]  
[REDACTED]

- If so, please describe and explain the analysis performed and the detailed results.

• [REDACTED]  
[REDACTED]  
[REDACTED]

■ [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Thank you,

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4/14/2018

Mall - Kai.Ayoub@ferc.gov

FW: NP18-7 questions

Robert Chambers

Redacted pursuant to FOIA Exemption 6

Fri 3/30/2018 12:00 PM

To: David Ortiz <David.Ortiz@ferc.gov>; [REDACTED] Mark Hegerle <Mark.Hegerle@ferc.gov>;  
Olutayo Oyelade <Olutayo.Oyelade@ferc.gov>; Michael Keane <Michael.Keane@ferc.gov>; Barry Kuehnle <Barry.Kuehnle@ferc.gov>;  
[REDACTED]

Cc: Loye Hull <Loye.Hull@ferc.gov>; [REDACTED]

FYI...

From: Robert Chambers

Sent: Friday, March 30, 2018 11:58 AM

To: 'Leigh Anne Faugust' <Leigh.Faugust@nec.net>

Cc: Ed Kichline (Ed.Kichline@nec.net) <Ed.Kichline@nec.net>; Loye Hull <loye.hull@ferc.gov>; [REDACTED]

Subject: NP18-7 questions

We have some questions regarding the full NOP, NP18-7:

Redacted pursuant to FOIA Exemptions 3 and 7

Risk Analysis

[REDACTED]

[REDACTED]

[REDACTED]

- The Stipulated Incident Facts state [REDACTED]

- [REDACTED]

- [REDACTED]

4/14/2018

Mail - Kal.Ayoub@ferc.gov

Mitigation of Risk

In the URE mitigation plan, the plan detail section states

[REDACTED]

[REDACTED]

[REDACTED]

The Stipulated Incident Facts state

[REDACTED] Domain  
Name (@pge.com),

[REDACTED]

[REDACTED]

• If so, please describe and explain the analysis performed and the detailed results.

[REDACTED]

[REDACTED]

[REDACTED]

4/14/2018

Mail - Kal.Ayoub@ferc.gov

Please provide your response on or before April 16, 2018.

Thank you,

**Bob Chambers**  
**Manager – Security Group 1**  
Federal Energy Regulatory Commission  
Office of Electric Reliability (OER)  
Division of Reliability Standards and Security  
301-865-1606  
[robert.chambers@ferc.gov](mailto:robert.chambers@ferc.gov)

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K'A

Doc. 5

**Kal Ayoub**

---

**From:** Robert Chambers  
**Sent:** Thursday, April 05, 2018 5:10 PM  
**To:** Cynthia Pointer  
**Cc:** Kal Ayoub  
**Subject:** FW: NP18-7 questions

FYI...

Redacted pursuant to FOIA Exemption 6

**From:** Robert Chambers  
**Sent:** Monday, April 02, 2018 7:43 AM  
**To:** 'Ed Kichline' <Ed.Kichline@nerc.net>; Leigh Anne Faugust <Leigh.Faugust@nerc.net>  
**Cc:** Loye Hull <loye.hull@ferc.gov>; Lea [REDACTED]  
**Subject:** RE: NP18-7 questions

Good morning Ed,

If that is possible in the future, we will let you know...

**Bob Chambers**  
**Manager – Security Group 1**  
Federal Energy Regulatory Commission  
Office of Electric Reliability (OER)  
Division of Reliability Standards and Security  
301-865-1608  
[robert.chambers@ferc.gov](mailto:robert.chambers@ferc.gov)

---

**From:** Ed Kichline [<mailto:Ed.Kichline@nerc.net>]  
**Sent:** Friday, March 30, 2018 1:28 PM  
**To:** Robert Chambers <[Robert.Chambers@ferc.gov](mailto:Robert.Chambers@ferc.gov)>; Leigh Anne Faugust <[Leigh.Faugust@nerc.net](mailto:Leigh.Faugust@nerc.net)>  
**Cc:** Loye Hull <[Loye.Hull@ferc.gov](mailto:Loye.Hull@ferc.gov)>; [REDACTED]  
**Subject:** RE: NP18-7 questions

Bob,

We will send these questions to WECC to start working along with the registered entity on the responses.

Loye had indicated in early March that there might be questions on the Full NOP. If possible in future months, we would appreciate if you could let us know that it is likely the Commission will extend its period for review prior to issuance of the Commission's Notice. That can help us keep the Regional Entity, the registered entity, and our management informed and result in less alarm when there is a Notice of Further Review.

Thank you,

Ed

---

**Ed Kichline****Senior Counsel and Director of Enforcement Oversight**

North American Electric Reliability Corporation

1325 G Street NW, Suite 600

Washington, DC 20005

202-400-3025 office | 917-754-3202 cell

[ed.kichline@nerc.net](mailto:ed.kichline@nerc.net)[Twitter @NERC\\_Official](#) | [LinkedIn](#)**Reliability | Accountability**

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Redacted pursuant to FOIA Exemption 6

---

**From:** Robert Chambers [<mailto:Robert.Chambers@ferc.gov>]**Sent:** Friday, March 30, 2018 11:58 AM**To:** Leigh Anne Faugust <[Leigh.Faugust@nerc.net](mailto:Leigh.Faugust@nerc.net)>**Cc:** Ed Kichline <[Ed.Kichline@nerc.net](mailto:Ed.Kichline@nerc.net)>; Love Hull <[Love.Hull@ferc.gov](mailto:Love.Hull@ferc.gov)>; [REDACTED]**Subject:** NP18-7 questions

We have some questions regarding the full NOP, NP18-7:

Redacted pursuant FOIA Exemptions 3 and 7

**Risk Analysis**

[REDACTED]

[REDACTED]

[REDACTED]

- **The Stipulated Incident Facts** [REDACTED]

[REDACTED]



[REDACTED]

**Mitigation of Risk**

In the URE mitigation plan, the plan detail section states [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The Stipulated Incident Facts state [REDACTED]

[REDACTED]

Name (@pge.com),

Domain

- [REDACTED]
- If so, please describe and explain the analysis performed and the detailed results.



• [REDACTED]

Please provide your response on or before April 16, 2018.

Thank you,

**Bob Chambers**  
**Manager – Security Group 1**  
Federal Energy Regulatory Commission  
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From: Robert Chambers  
To: David Ortiz; [REDACTED]; Hegerle; Olutayo Oyelade; [REDACTED]  
Cc: Loye Hull; [REDACTED]  
Subject: FW: NP18-7 questions  
Date: Friday, March 30, 2018 12:00:14 PM

---

FYI...

From: Robert Chambers  
Sent: Friday, March 30, 2018 11:58 AM  
To: 'Leigh Anne Faugust' <Leigh.Faugust@nerc.net>  
Cc: Ed Kichline (Ed.Kichline@nerc.net) <Ed.Kichline@nerc.net>; Loye Hull <loye.hull@ferc.gov>; [REDACTED]  
Subject: NP18-7 questions

We have some questions regarding the full NOP, NP18-7:

**Risk Analysis**

Redacted pursuant to FOIA Exemptions 3 and 7

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

- The Stipulated Incident Facts state [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

**Mitigation of Risk**

In the URE mitigation plan, the plan detail section states '[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]

The Stipulated Incident Facts state [REDACTED]  
[REDACTED]  
[REDACTED]  
*Domain Name (@pge.com),*  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

- If so, please describe and explain the analysis performed and the detailed results.

- [REDACTED]  
[REDACTED]  
[REDACTED]

- [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



[REDACTED]

- [REDACTED]

Please provide your response on or before April 16, 2018.

Thank you,

**Bob Chambers**  
**Manager – Security Group 1**  
Federal Energy Regulatory Commission  
Office of Electric Reliability (OER)  
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Redacted pursuant to FOIA Exemption 6

**From:** Robert Chambers  
**To:** "Ed Kichline"; Leigh Anne Faugust  
**Cc:** Loya Hull; [REDACTED]  
**Subject:** RE: NP18-7 questions  
**Date:** Monday, April 02, 2018 7:42:00 AM

---

Good morning Ed,

If that is possible in the future, we will let you know...

**Bob Chambers**  
**Manager – Security Group 1**  
Federal Energy Regulatory Commission  
Office of Electric Reliability (OER)  
Division of Reliability Standards and Security  
301-665-1606  
[robert.chambers@ferc.gov](mailto:robert.chambers@ferc.gov)

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**From:** Ed Kichline [mailto:[Ed.Kichline@nerc.net](mailto:Ed.Kichline@nerc.net)]  
**Sent:** Friday, March 30, 2018 1:28 PM  
**To:** Robert Chambers <[Robert.Chambers@ferc.gov](mailto:Robert.Chambers@ferc.gov)>; Leigh Anne Faugust <[Leigh.Faugust@nerc.net](mailto:Leigh.Faugust@nerc.net)>  
**Cc:** [REDACTED]  
**Subject:** RE: NP18-7 questions

Bob,

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Ed

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**Ed Kichline**  
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Washington, DC 20005  
202-400-3025 office | 917-754-3202 cell  
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**From:** Robert Chambers [mailto:Robert.Chambers@ferc.gov]  
**Sent:** Friday, March 30, 2018 11:58 AM  
**To:** Leigh Anne Faugust <Leigh.Faugust@nerc.net>  
**Cc:** Ed Kichline <Ed.Kichline@nerc.net>; Loye Hull <Loye.Hull@ferc.gov>; [REDACTED]  
**Subject:** NP18-7 questions

Redacted pursuant to FOIA Exemptions 3 and 7

We have some questions regarding the full NOP, NP18-7:

**Risk Analysis**

[REDACTED]

- [REDACTED]

[REDACTED]

- The Stipulated Incident Facts state [REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

**Mitigation of Risk**

In the URE mitigation plan, the plan detail section states [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The Stipulated Incident Facts state [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED] Domain Name (@pge.com), [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

- If so, please describe and explain the analysis performed and the detailed results.

[REDACTED]

[REDACTED]

[REDACTED]

Please provide your response on or before April 16, 2018.

Thank you,

**Bob Chambers**  
**Manager – Security Group 1**  
Federal Energy Regulatory Commission  
Office of Electric Reliability (OER)  
Division of Reliability Standards and Security  
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