

# **BPA Policy 620-2**

## **Access to BPA Energized Facilities**

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## 1. Purpose & Background

This policy establishes the minimum requirements for controlling access to Bonneville Power Administration (BPA) energized facilities to keep persons safe from the hazards located within these restricted areas, and to comply with directives from the North American Electric Reliability Corporation (NERC) regarding critical infrastructure protection. Entrants to these facilities must have a permit which allows qualified persons to enter energized facilities unescorted for the purpose of observation or performance of work, or be escorted by an individual who does.

Permits demonstrate that individuals have demonstrated the knowledge that they can keep themselves safe and comply with NERC requirements.

## 2. Policy Owner

This policy is owned by the Senior Vice President of Transmission Services. The Vice President of Transmission Systems Operations is responsible for monitoring its continuing effectiveness and can approve changes to the Rules of Conduct Handbook (ROCH). The Supervisor of Substation Operations (TOZ) is responsible for its operational implementation.

## 3. Applicability

This policy applies to all entrants to BPA energized facilities.

## 4. Terms & Definitions

- A. **Rules of Conduct Handbook (ROCH):** The Rules of Conduct Handbook defines procedures governing access and movement within BPA energized facilities, requirements for obtaining and renewing access and the associated worker permits, and obtaining Clearance Certifications.
- B. **Occupational Safety and Health Administration (OSHA):** OSHA is a federal agency that assures safe and healthful working conditions by setting and enforcing standards, and by providing training, outreach, education and assistance.
- C. **North American Electric Reliability Corporation (NERC):** A not-for-profit international regulatory authority whose mission is to assure the effective and efficient reduction of risks to the reliability and security of the power grid.
- D. **Permit:** A level of permission granted to qualified persons to enter energized facilities unescorted for the purpose of observation or performance of work.
- E. **Energized Facility:** BPA substations including substation control houses, all buildings included as part of the substation perimeter or contained within the substation, and the high voltage switchyard having energized equipment connected to the high voltage power system.

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<b>Author</b> Josh McEllrath (TOZ)	<b>Approved by</b> Richard Shaheen, SVP Transmission Services	<b>Date</b> 2/11/2022	<b>Version</b> 1.0	Page 2

## 5. Policy

No person shall enter a BPA energized facility unless they have a permit issued in accordance with the ROCH, are escorted by a person having a permit, or are a qualified worker of a utility having authorization by BPA to enter unescorted.

## 6. Policy Exceptions

**Variations:** Variations to this standard are considered only when the requirements of the safety standards are impractical or create conflicts within the guidance provided herein. Variations shall provide an equal or greater level of protection. All requests for variance must be in writing and directed to the supervisor of Substation Operations (TOZ) for approval.

## 7. Responsibilities

**Substation Operations Group (TOZ):** Is responsible for maintenance and oversight of the Rules of Conduct Handbook (ROCH). The ROCH is designated as the procedure document that applies to all entrants to BPA energized facilities. Levels of permit, methodologies to help decide what level of permit is needed, how to apply and obtain a permit, and how to obtain a Clearance Certification for Electrical Worker Permit holders are described in detail.

**Safety Organization (NF):** Is responsible for providing an annual review that the learning objectives contained in the ROCH adhere to the intent of OSHA training requirements for electrical transmission, generation, and distribution industries in both general industry and construction regulations.

**Physical Security (NPP):** Is responsible for the Personnel Risk Assessment (PRA) that consists of a criminal history check and personal identity verification which are both required by NERC to attain unescorted access to energized facilities.

**Supervisors and Managers:** All supervisors and managers are responsible for the following:

- A. Providing all necessary paperwork and Human Resources Management Information System (HRmis) proof of training for their employees who are requesting or renewing their permitted access to TOZ.
- B. Signing and attesting that their employees have a business need for the level of permit being requested.
- C. Reporting a change in employment (retirement, resignation, termination for cause) within 24 hours in accordance with the ROCH.

**Contracting Officer's Representatives:** All Contracting Officer's Representatives are responsible for the following:

- A. Initiating the permit application process with the contractor.

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- B. Confirming that the contract worker requires energized access, has a recurring business need to enter an energized facility, and that the permit level requested is appropriate for the scope of work to be performed.
- C. Reporting a change in employment (retirement, resignation, termination for cause) within 24 hours in accordance with the ROCH.

## 8. Standards & Procedures

*Rules of Conduct Handbook: Procedures, Permits for Energized Access, and Clearance Certifications:*

<https://txportal.bud.bpa.gov/orgs/TO/TOZ/Policies%20%20Procedures%20Governing%20Permits%20%20Energized/2021%20ROCH.pdf>

## 9. Performance & Monitoring

Ongoing monitoring and review of this policy as well as the Rules of Conduct Handbook procedure document will be conducted by Substation Operations (TOZ) to ensure that appropriate access controls are in place. Such monitoring will include review of permissions, management controls, periodic audits by BPA’s Internal Audit department, and regular external audits by the Western Electricity Coordinating Council (WECC) to ensure continued compliance with NERC requirements.

## 10. Authorities & References

1. 29 CFR 1910.269, *Electric power generation, transmission and distribution*
2. 29 CFR 1926 Subpart V, *Electric Power Transmission and Distribution*
3. NERC Reliability Standards for the Bulk Electric Systems of North America, Critical Infrastructure Protection Standards
4. Bonneville Purchasing Instructions § 35.2.175, Clause 15-16, Access to Bonneville Facilities and Computer Systems

## 11. Review

This policy will be reviewed by the Supervisor of Substation Operations (TOZ) every 3 years. The Supervisor of Substation Operations shall ensure that staff update the Rules of Conduct Handbook annually.

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## 12. Revision History

<b>Version Number</b>	<b>Issue Date</b>	<b>Brief Description of Change/Review</b>
1.0	2/11/2022	New policy

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