BPA Policy 260-2
Business Resilience

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1. Purpose & Background

It is the Bonneville Power Administration (BPA) policy to incorporate resilience concepts and activities into its business practices to enhance the BPA's capabilities to be prepared for, respond to, and recover from unexpected disruptions. These concepts are designed to maintain operations, keep staff safe and minimize unintended consequences. Truly resilient agencies understand the threats and risks facing their organizations, and the potential impacts of changing market forces. Resilient agencies prepare for and connect the seemingly unrelated pieces of information in a way that makes the organization stronger and more resilient. Resiliency should focus across the enterprise and takes into consideration the Federal Emergency Management Agency's (FEMA) and the Cybersecurity/ Infrastructure Security Agency's (CISA) four classification areas of technical, organizational, social, and economic strategic facets of the business.

FEMA and CISA doctrine states that resiliency consists of three parts: robustness (what is done before a disaster), resourcefulness (what is done during the a disaster), and recovery (what is done after a disaster).When these three areas are addressed as part of a resiliency program, an organization can rapidly return back from below the impact baseline of a disaster to an operational reality that potentially can be higher than what it was at prior, as per the graph below.
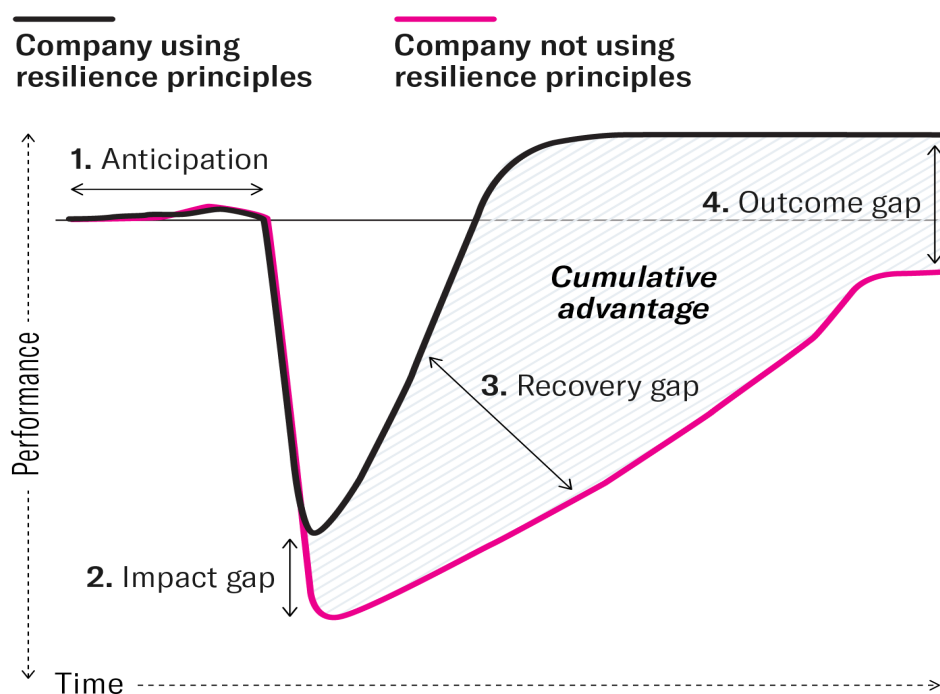
Reves, Maritn. "A Guide to Building a More Resilient Business", Harvard *Business Review (7/2/2020).*

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This Policy establishes the agency-wide Business Resilience Program (BRP) designed to:

- Embed a culture of resilience throughout BPA.
- Provide a program that can assist originations within BPA with resiliency subject matter expertise as they work to achieve more resilient planning and operations.
- Broaden personnel's view of typical and atypical emergent threats, risks, and consequences that could impact the BPA's resiliency in collaboration with Enterprise Risk Management (ERM) and all business lines.
- Establish new ways of operating by including proactive risk identification, preparedness, and mitigation to anticipate and prepare for possible disruptions, and develop the competencies and capabilities necessary to respond more effectively.
- Develop, track, and report on metrics to measure BPA's resilience posture.
- Facilitate implementation, oversight, and testing of the BPA's resiliency activities.
- Align with North American Transmission Forum (NATF) resiliency strategy to promote excellence in the safe, reliable, and resilient operation of electric transmission systems.

This Policy reinforces existing agency policies and procedures that support the BPA's ongoing and related resilience activities within all Business Units.

2. Policy Owner

The Chief Administrative Officer (CAO) is the policy owner. The Chief Administrative Officer. and the Chief Administrative Office is responsible for the implementation of the Business Resiliency Program.

3. Applicability

This policy applies to all departments and functions at BPA, in that it reinforces existing agency policies and procedures that support the BPA's ongoing and related resilience activities within all Business Units.

4. Terms & Definitions

BRP – Business Resilience Program

Continuity of Operations Planning (COOP) – Business continuity is the capability of an organization to deliver products and services within acceptable timeframes at predefined capacity during a disruption. A business continuity plan is documented information that guides an organization to respond to a disruption and provides the mission essential functions only.

ERM – Enterprise Risk Management

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Resilience – According to DOE Order 150.1B Continuity Programs, resilience is "The ability to prepare for and adapt to changing conditions and recover rapidly from operational disruptions. Resilience includes the ability to withstand and recover from deliberate attacks, accidents, or naturally occurring threats or incidents." Resilience is an organization's ability to absorb stress, recover critical functionality, and thrive in altered circumstances. It positions organizations to prepare for anything. Resiliency needs to be about more than just protecting a company's essential operations. All organizations within BPA must be able to adapt to continuous change as well as major events and potentially become stronger from the event.

Risk Assessment – Identify your priority of risk within the five categories (safety, reliability, financial, environment and compliance), as well as the risk's likelihood and consequences for the current state. Risk is defined by the likelihood of an event and its consequence. Once the likelihood and consequences of risks have been determined, the risks are then prioritized. A consistent framework for prioritizing risks should be used across the asset category; often, trade-offs and iterations are needed to reach an integrated set of priority risks for the asset category. The basis for the prioritization must be documented.

5. Policy

Despite all best efforts, it is impossible to avoid occasional, potentially large outages caused by natural disasters or malicious physical or cyber-attacks. Because of this, BPA is compelled to establish a business resiliency program to fulfill its statutory obligations in times of emergency. Business resiliency is a holistic as well as overarching approach that integrates people, operations, asset management, facilities, supply chain, security, and finance. To be successful, collaboration, input, and support must occur with numerous organizations like Continuity, Risk, and numerous others.

To achieve resiliency, an organization must incorporate planning, organizing, equipping, training, and exercise/evaluation as strategies to ensure resilient outcomes are reached for future incidents. Resilience related themes are embedded in five (invest in people, sustain financial strength, mature asset management, preserve safe/ reliable system operations, modernize business systems and processes) of the six strategic goals laid out in BPA's 2024-2028 Strategic Plan. Likewise, in compliance with established HQ DOE program requirements, BPA established a business resilience program to ensure that organizations can fulfill their statutory obligations in times of disaster.

A. The Chief Administrative Officer shall sponsor and provide overall direction and guidance for BPA's Business Resiliency Program.

B. The Deputy Chief Administrative Officer shall provide direct management and oversight of BPA's Business Resilience Program.

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1. BPA shall establish a Business Resilience Steering Committee to build a resiliency culture within BPA such that the organization can successfully prepare for, and navigate through, all hazards and be able to anticipate, withstand and effectively respond to disruptive events affecting the Pacific Northwest.

   a) BPA's Enterprise Risk Management Organization shall support BPA's Business Resilience Steering Committee to ensure that BPA addresses the appropriate Risks associated with Business Resilience and Security.

   b) BPA's Asset Management Organization shall support BPA's Business Resilience Steering Committee to ensure that BPA addresses the appropriate Strategic Asset Management Plan (SAMP) and critical infrastructure investments associated with Business Resiliency and Security.

C. BPA's Deputy Chief Administrative Officer shall define and implement program requirements, consistent with HQ DOE Program Requirements for Resiliency.

6. Policy Exceptions

There are no exceptions to this policy.

7. Responsibilities

A. **Chief Administrative Officer:** The Chief Administrative Officer (CAO) provides oversight for implementation of the BRP and its objectives. The CAO communicates and coordinates with the Business Resilience Program Manager, Deputy Chief Administrative Officer (DCAO), and Chief Operating Officer (COO) regarding BRP planning, objectives, activities, and posture. The CAO provides guidance to the Business Resilience Steering Committee regarding BRP vision and strategy, and the BPA's business objectives.

B. **Deputy Chief Administrative Officer (DCAO):** DCAO is the Management Oversight Owner (MOO) of the BRP and has responsibility for managing the overall requirements of this Policy by providing leadership for BRP implementation, including governance, program administration, strategic direction, goals, targets, metrics, action plans, and reports. The DCAO communicates and coordinates with the CAO, Deputy Administrator, and COO regarding BRP achievements, needs, and concerns.

C. **Business Resilience Program Manager (BRPM):** BRPM is the content owner of this Policy and has authority to develop proposals, present information to the Business Resilience Workgroup, Steering Committee and Executive Sponsors and implement procedures to achieve BRP objectives. The BRPM works with the DCAO, CAO Program Management Officer and Business Resilience Steering Committee to set direction, timing, and program requirements to achieve BPA's BRP vision, strategy, and business objectives; and advises the DCAO and Chief Administrative Officer (CAO) on

organizational policies supporting the BRP. The Business Resilience Program Manager is responsible for:

1. Managing and/or coordinating resilience activities across the BRP portfolio, including but not limited to, the following subject areas: Disaster Recovery, Business Continuity Management, Emergency Management, Grid & Physical Security, Cyber Security, Insider Threat, Supply Chain, Workforce Resilience, Power Services, Transmission Services, and Extreme Weather.

2. Creation, administration, and maintenance of BRP governance documentation (policies, procedures, and supporting documents).

3. Creation, administration, and maintenance of BRP goals, targets, metrics, action plans, and reports.

4. Coordination of Business Resilience Steering Committee activities with key stakeholders and providing direction and support to those groups to achieve BRP objectives.

5. Coordination and collaboration with key stakeholder-led resilience initiatives to ensure alignment with the BPA Strategic Plan and BRP strategy and objectives.

6. Serving as the BRP representative to the Business Resilience Steering Committee; and

7. Informing the Chief Administrative Officer (CAO), DCAO, and Business Resilience Steering Committee of BRP achievements, needs, and concerns.

D. **CAO Program Management Officer:** provides oversight of the Business Resilience Program and reviews completed projects, evaluations, reports, or recommendations for compatibility with organizational goals, guidelines, and effectiveness in achieving intended objectives.

E. **Business Resilience Steering Committee:** The Business Resilience Steering Committee performs functions in accordance with its Charter, which include but are not limited to:

1. Collaborating with personnel to understand the implications of current and planned resilience-related initiatives or identified risks and providing guidance that aligns with BRP objectives.

2. Identifying and monitoring actions and events that have the potential to impact the BPA's resiliency and recommending mitigating actions; and

3. Promoting a forum for discussion on resilience concerns or activities to inform the preparation, implementation, or evaluation of the BRP.

4. Responsible to coordinate work under Resiliency with business line managers

F. **Enterprise Risk Management Organization:** The Enterprise Risk Management (ERM) organization supports implementation of the BRP to enhance the BPA's resiliency.

   1. ERM provides information to Business Resilience Committee about identified risks, risk assessments, risk management activities, risk tolerance, and risk acceptance. ERM collaborates with Business Resilience Steering Committee to leverage resources, information, and systems.

G. **Key Stakeholders and Personnel:** Key Stakeholders and Subject Matter Experts (SMEs) shall work with Business Resilience Steering Committee to:

   1. Leverage ERM risk information to ensure collaboration with Business Resilience Steering Committee and BRP when identifying new or escalating existing typical and atypical emergent resilience risks identified through the implementation of day-to-day activities.

   2. Support BRP implementation within business lines, organizations, and supporting business functions and processes; and

   3. Participate in BRP information seeking for business resiliency strategy, roadmap, initiatives/projects prioritization, and awareness campaigns.

8. Standards & Procedures

A. National Transmission Forum (NATF) Resiliency Strategy 2022

B. Transmission Resilience Maturity Model (TRMM) Assessment; 2021.

C. Agency Enterprise Risk Influence Diagram

D. Business Impact Analysis; 2019

9. Performance & Monitoring

A. The Business Resilience Program conducts an annual review and assesses capabilities and compliance with this policy.

B. The Chief Administrative Office maintains a [Business Resiliency Dashboard](#) to measure metrics associated with BPA's Business Resiliency.

C. Every four years BPA conducts a Transmission Resilience Maturity Model evaluation of nine domains, with support from the NATF. These nine domains include:

Resilience Program Management

Risk Identification, Assessment &Management

Situational Awareness

Event Response/ Recovery

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Transmission &Supporting Equipment Management

Information Sharing and Communications

Supply Chain & Critical Entities Management

Transportation Management

Work force & Family Care Plan Management

This measures BPA progress in developing capabilities as well as understanding the maturity of the agency's transmission resilience program.

10. Authorities & References

A. 16 USC § 832 et seq., Bonneville Project Act of 1937

B. DOE Order 150.1a, Continuity Programs

C. DOE Order 151.1d, Comprehensive Emergency Management System

D. Executive Order 12148, Federal Emergency Management, as amended

E. FEMA, Federal Continuity Directive 1, Federal Emergency Management Agency

F. FEMA, Federal Continuity Directive 2, Federal Emergency Management Agency

G. 44 USC, Ch. 1 § 101; and Ch. 35. I § 3501 et seq., Federal Information Security Management Act (FISMA)

H. 41 CFR § 102-74, Federal Management Regulation

I. 6 USC § 101 et seq., Homeland Security Act of 2002

J. Homeland Security Council, National Continuity Policy Implementation Plan

K. Homeland Security Presidential Directive 5, Management of Domestic Incidents

L. National Fire Prevention Association, NFPA 101 Life Safety Code 4.7 Fire Drills

M. National Security Strategy 2017, Pillar I-Promote American Resilience

N. North American Electric Reliability Corporation, Reliability Standards National Transmission Forum (NATF) Resiliency Strategy 2022

O. 29 CFR § 1910.39, OHSA – Emergency Action Plans

P. Presidential Policy Directive 8, National Preparedness Organization

Q. Presidential Policy Directive 21 (PPD-21), Critical Infrastructure Security and Resilience (February 2013)

R. National Institute of Standards and Technology (NIST) Special Publication 800-34, Contingency Planning Guide for Federal Information Systems

S. 2020 Federal Mission Resilience Strategy

T. DOE Federal Mission Resiliency Strategy

U. BPA Strategic Asset Management Plan 3.0

V. ISO 22316: Security22316: Security and resilience — Organizational resilience — Principles and attributes

X. ISO 22301: Security22301: SECURITY and resilience — Business continuity management systems — Requirements

Y. 2020 Transmission Resiliency Maturity Model (TRMM) Assessment - TRMM link Exit Assessment/Report

Z. Quadrennial Homeland Security Review (QHSR) 2014, Mission 5 – Strengthening National Preparedness and Resilience.

11. Review

This policy is reviewed every five (5) Years for errors, omissions, and relevance by the CAO Program Management Office.

12. Revision History

Version Number	Issue Date	Brief Description of Change or Review
1.0		Initial Policy Development
2.0		Update for program move to the CAO Program Management Office
3.0	02/14/2025	Revision to comply with new EOs.

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