Please **DO NOT** use this form to submit comments. Please use the [electronic comment form](https://www.nerc.net/nercsurvey/Survey.aspx?s=d58c00d2a653476e8b18430eac6bae60) to submit comments on the interpretation of CIP-006-x for Progress Energy (Project 2008-10). The electronic comment form must be completed by **November 21, 2011.**

[Project Page](http://www.nerc.com/filez/standards/Project2008-10_CIP-006_Interpretation_Progress.html)

If you have questions please contact Steven Noess at [steven.noess@nerc.net](mailto:steven.noess@nerc.net)

or by telephone at 404-446-9691.

### **Background Information**

The last successive ballot to this interpretation closed on October 12, 2009. Since that date, a project team from the CIP Interpretation Drafting Team reviewed and responded to the comments received from the last successive ballot and made revisions to the interpretation. The project team revised the interpretation pursuant to NERC Guidelines for Interpretation Drafting Teams ([available here](http://www.nerc.com/files/Guidelines_for_Interpretation_Drafting_Teams_Approved_April_2011.pdf)).

The interpretation drafting team determined that the interpretation must limit itself to the question asked: whether CIP-006-1, Requirement R1.1, applies to the aspects of wiring that comprises the ESP. The interpretation drafting team revised the interpretation from the last successive ballot accordingly.

The definition of “Cyber Asset” in the *NERC Glossary of Terms Used in Reliability Standards* includes “communication networks,” but the interpretation drafting team determined that it does not explicitly include wiring or communication mediums in general. Since wiring is not included in the definition of “Cyber Asset,” the interpretation drafting team interpreted that Requirement R1.1 of CIP-006-1 does not apply to wiring.

The team furthermore acknowledges and notes in its revised interpretation that a different interpretation, appended to CIP-006-3c as appendix 3, applies to the “alternative measures” question “where a completely enclosed (‘six-wall’) border cannot be established” for “Cyber Assets within an Electronic Security Perimeter.” The interpretation drafting team has determined that such analysis is beyond the scope of this interpretation. CIP-006-1 R1.1 applies to “Cyber Assets” and this interpretation is limited to whether wiring is a “Cyber Asset.” A secondary analysis of “acceptable alternative measures where a completely enclosed (‘six-wall’) border cannot be established” does not apply.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.*

Please review the request for an interpretation, the associated standard, and the draft interpretation and then answer the following questions.

1. The NERC Board of Trustees indicated that the interpretation process **should not** be used to address requests for a decision on **“how”** a reliability standard applies to a registered entity’s particular facts and circumstances. Do you believe this request for an interpretation is asking for clarity on the meaning of a requirement or clarity on the application of a requirement?

The request is asking for clarity on the **meaning** of a requirement.

The request is asking for clarity on the **application** of a requirement.

Comments:

1. The NERC Board of Trustees indicated that in deciding whether or not to approve a proposed interpretation, it will use a standard of strict construction and not seek to expand the reach of the standard to correct a perceived gap or deficiency in the standard. Do you believe this interpretation expands the reach of the standard?

The interpretation **expands** the reach of the standard.

The interpretation **does not expand** the reach of the standard.

Comments:

1. Do you agree with this interpretation? If not, why not.

Yes

No

Comments:

4. Are there any other comments you would like to add that haven’t been covered in the previous questions, please add them here.

Comments: