

January 13, 2015

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, D.C. 20426

Re: Request for Extension of Time to File Revisions to the Critical Infrastructure Protection Reliability Standards, Docket No. RM13-5-\_\_\_\_\_

Dear Secretary Bose:

The North American Electric Reliability Corporation (“NERC”) hereby requests a 10-day extension of time to file the revisions to the Critical Infrastructure Protection (“CIP”) Reliability Standards required by Order No. 791.<sup>1</sup> As explained below, the 10-day extension will provide NERC time to submit all of the modifications required by Order No. 791 as a single package and ease the administrative burden on the Commission, NERC, and the industry.

In Order No. 791, the Commission approved new and modified CIP Reliability Standards, referred to as the CIP Version 5 Standards, and, among other things, directed NERC to develop the following four modifications to those standards:

1. Modify or remove the language in 17 requirements in the CIP Version 5 Standards that requires entities to implement cyber security policies in a manner that “identifies, assesses, and corrects deficiencies.”
2. Develop modifications to the CIP Version 5 Standards to address security controls for assets containing “low impact” BES Cyber Systems.
3. Develop requirements that protect transient electronic devices (e.g., thumb drives, laptop computers) that fall outside the definition of BES Cyber Asset.
4. Create a definition of “communication networks” and develop new or modified standards that address the protection of the nonprogrammable components of communication networks.

The Commission directed NERC to submit the modifications in response to the “identify, assess, and correct” and communications network directives within one year from the effective date of Order No. 791, which is February 3, 2015. The Commission did not provide a deadline for the other directives.

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<sup>1</sup> *Version 5 Critical Infrastructure Protection Reliability Standards*, Order No. 791, 145 FERC ¶ 61,160 at PP 4, 42, 67, 76, 124, 125, 150 (2013).

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Following the issuance of Order No. 791, NERC initiated a standards development project to address all four directives simultaneously. In November 2014, the NERC Board of Trustees (“BOT”) adopted revisions addressing the “identify, assess, and correct” language and the communications network directive. Although the revisions to address the other directives also received the requisite stakeholder approval at that time, the standard drafting team determined that additional development was necessary to address certain stakeholder comments. As such, NERC did not request BOT adoption of those revisions at the November 2014 BOT meeting. Instead, NERC posted a revised set of standards for comment and an additional ballot on November 25, 2014.<sup>2</sup>

Given that the revisions associated with the “low impact” and transient electronic device directives were nearing completion, NERC decided that it was prudent to await the outcome of the additional ballot to see if all of the revisions addressing the Order No. 791 directives could be filed as a single package for Commission approval. This approach will conserve Commission and industry resources and avoid the potential confusion that could result from the filing of overlapping standards. On January 9, 2015, the revised set of standards passed additional ballot. A 10-day final ballot will be conducted at the end of January 2015. The next scheduled meeting at which the BOT can adopt the revised set of standards, however, is February 12, 2015. Accordingly, NERC respectfully requests a short, 10-day extension of time, until February 13, 2015, to file the revisions addressing the “identify, assess, and correct” and the communications network directives. A 10-day extension will allow the NERC BOT time to approve the proposed revisions at its regularly scheduled meeting while also enabling NERC to file a single set of revised standards addressing the Order No. 791 directives.

As the February 3, 2015 deadline is quickly approaching, NERC respectfully requests that the Commission act expeditiously on the request.

Should you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Shamai Elstein

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<sup>2</sup> This revised set of standards would supersede many of the standards adopted by the NERC BOT in November 2014.

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 13th day of January, 2015.

/s/ Courtney Baughan  
Courtney Baughan

Legal Assistant for the North American Electric  
Reliability Corporation