

## Consideration of Comments for Project 2008-06 — Cyber Security Order 706 (CIP Version 2 VSLs and VRFs)

The Cyber Security Order 706 Standard Drafting Team and Cyber Security Violation Severity Levels Drafting Teams thank all commenters who submitted comments on the CIP Version 2 VSLs and VRFs. The Version 2 VRFs and VSLs were posted for a 30-day public comment period from March 16, 2009 through April 20, 2009. Stakeholders were asked to provide feedback through a Word document Comment Form. There were 12 sets of comments, including comments from more than 60 different people from over 45 companies representing 7 of the 10 Industry Segments as shown in the table on the following pages.

While the comment form addressed VSLs for the Version 1 Cyber Security Standards and the SAR for that project as well as the VSLs and VRFs for the Version 2 Cyber Security Standards, this report addresses only the VRFs and VSLs for Version 2 Cyber Security Standards. Comments related to the Version 1 Cyber Security VSLs were addressed in a separate report.

For this report, stakeholder comments were sorted so that it is easier to see all related comments. All comments have been posted in their original format at the following site:

**Project 2008-14 Cyber Security Violation Severity Levels Drafting Team:**  
[http://www.nerc.com/filez/standards/Project2008-14\\_Cyber\\_Security\\_VSLDT.html](http://www.nerc.com/filez/standards/Project2008-14_Cyber_Security_VSLDT.html)

Based on stakeholder comments, the drafting team did make some changes to some of the sets of VSLs for CIP-002-2, CIP-003-2, CIP-004-2, CIP-005-2, and CIP-006-2. No changes were made to VSLs for CIP-007-2, CIP-008-2 or for CIP-009-2. Most changes were either clarifying or format changes. In some cases, stakeholders identified additional descriptions of noncompliant performance that could be used to add more options to the already proposed VSLs – and where the proposed VSLs met the definitions for the proposed VSL category, the proposed VSLs were adopted.

Some stakeholders are opposed to setting noncompliance with a binary requirement or subrequirement as a “Severe” VSL. If an entity is totally noncompliant with a requirement, then this meets the criteria for a “Severe” VSL.

Some stakeholders commented that the drafting team should have developed a single set of VSLs for a requirement and its associated subrequirements. The drafting team agrees that having a single set of VSLs for each requirement, in its entirety, is preferable, however, in accordance with the directives in FERC's VSL Order, the drafting team has assigned a set of VSLs to each requirement and each subrequirement that has a VRF. Note that there are a few exceptions where the drafting team felt it could reasonably use a “roll-up” approach to VSLs, it did so. Where both the requirement and the subrequirement have sets of VSLs, the team has taken care to develop VSLs that should not result in double jeopardy.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Gerry Adamski, at 609-452-8060 or at [gerry.adamski@nerc.net](mailto:gerry.adamski@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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<sup>1</sup> The appeals process is in the Reliability Standards Development Procedures:  
<http://www.nerc.com/standards/newstandardsprocess.html>.

**Index to Questions, Comments, and Responses**

1. Please review the proposed incremental changes made to the version 1 VSLs to create a set of version 2 VSLs that is compatible with the version 2 CIP-002-2 through CIP-009-2 standards as posted for industry pre-ballot review commencing March 3, 2009. Then in the following table, please provide alternate language for any of the incremental changes to the VSLs that you disagree with. Please be sure to identify the standard number and requirement number for each proposed revision. .... 8
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**Consideration of Comments for Project 2008-06 — Cyber Security Order 706 (CIP Version 2 VSLs and VRFs)**

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

		Commenter	Organization	Industry Segment										
				1	2	3	4	5	6	7	8	9	10	
1.	Group 1	Ben Li	IRC Standards Review Committee		X									
2.	Group 1	Charles Yeung	SPP		X									
3.	Group 1	Patrick Brown	PJM		X									
4.	Group 1	Lourdes Estrada-Saliner	CAISO		X									
5.	Group 1	James Castle	NYISO		X									
6.	Group 1	Steve Myers	ERCOT		X									
7.	Group 1	Matt Goldberg	ISO-NE		X									
8.	Group 1	Bill Phillips	MISO		X									
9.	Individual	Chris Scanlon	Exelon	X										
10.	Individual	Dan Rochester	IESO		X									

**Consideration of Comments for Project 2008-06 — Cyber Security Order 706 (CIP Version 2 VSLs and VRFs)**

		Commenter	Organization	Industry Segment										
				1	2	3	4	5	6	7	8	9	10	
11.	Group 2	Denise Koehn	Bonneville Power Administration	X										
12.	Group 2	Huy Ngo	Control Cntr HW Design & Maint	X										
13.	Group 2	Allen Chan	General Counsel	X		X		X	X					
14.	Group 2	Robin Chung	Generation Support			X		X	X					
15.	Group 2	Sheree Chambers	Power Scheduling Coordination			X		X	X					
16.	Group 2	Tina Weber	Power Scheduling Coordination			X		X	X					
17.	Group 2	Pete Jeter	Security & Emergency Response	X		X		X	X					
18.	Group 2	Erik Smith	Security & Emergency Response	X		X		X	X					
19.	Group 2	Dick Winters	Substation Operations	X										
20.	Group 2	Curt Wilkins	Transmission System Operations	X										
21.	Group 2	Kelly Hazelton	Transmission System Operations	X										
22.	Group 2	Jim Domschot	Transmission Work Planning and Evaluation	X										
23.	Group 2	Jim Jackson	Transmission Work Planning and Evaluation	X										
24.	Group 2	Kevin Dorning	Tx PSC Technical Services	X										
25.	Individual	Greg Rowland	Duke Energy	X		X		X	X					
26.	Group 3	Guy Zito	Northeast Power Coordinating Council											X
27.	Group 3	Ralph Rufrano	New York Power Authority					X						
28.	Group 3	Rick White	Northeast Utilities	X										

**Consideration of Comments for Project 2008-06 — Cyber Security Order 706 (CIP Version 2 VSLs and VRFs)**

		Commenter	Organization	Industry Segment										
				1	2	3	4	5	6	7	8	9	10	
29.	Group 3	Chris de Graffenried	Consolidated Edison Com. Of New York, Inc.	X										
30.	Group 3	David Kiguel	Hydro One Networks Inc.	X										
31.	Group 3	Randy MacDonald	New Brunswick System Operator		X									
32.	Group 3	Roger Champagne	Hydro-Quebec TransEnergie		X									
33.	Group 3	Tony Elacqua	New York Independent System Operator		X									
34.	Group 3	Manny Couto	National Grid	X										
35.	Group 3	Kathleen Goodman	ISO - New England		X									
36.	Group 3	Brian Evans-Mongeon	Utility Services, LLC						X					
37.	Group 3	Mike Garton	Dominion Resources Services					X						
38.	Group 3	Chris Orzel	FPL/NextEra					X						
39.	Group 3	Sylvain Clermont	Hydro-Quebec TransEnergie	X										
40.	Group 3	Kurtis Chong	Independent Electricity System Operator		X									
41.	Group 3	Lee Pedowicz	Northeast Power Coordinating Council											X
42.	Group 3	Gerry Dunbar	Northeast Power Coordinating Council											X
43.	Group 3	Mike Gildea	Constellation Energy						X					
44.	Group 3	Michael Schiavone	National Grid	X										
45.	Group 3	Brian Hogue	Northeast Power Coordinating Council											X

**Consideration of Comments for Project 2008-06 — Cyber Security Order 706 (CIP Version 2 VSLs and VRFs)**

		Commenter	Organization	Industry Segment																
				1	2	3	4	5	6	7	8	9	10							
46.	Group 4	Michael Brytowski	MRO NERC Standards Review Subcommittee																	X
47.	Group 4	Carol Gerou	MP	X		X		X	X											
48.	Group 4	Neal Balu	WPS			X	X	X	X											
49.	Group 4	Terry Bilke	MISO		X															
50.	Group 4	Joe DePoorter	MGE			X	X	X	X											
51.	Group 4	Ken Goldsmith	ALTW				X													
52.	Group 4	Jim Haigh	WAPA	X						X										
53.	Group 4	Terry Harbour	MEC	X		X		X	X											
54.	Group 4	Joseph Knight	GRE	X		X		X	X											
55.	Group 4	Scott Nickels	RPU			X	X	X	X											
56.	Group 4	Dave Rudolph	BEPC	X		X		X	X											
57.	Group 4	Eric Ruskamp	LES	X		X		X	X											
58.	Group 4	Pam Sordet	XCEL	X		X		X	X											
59.	Individual	Michael J. Sonnelitter	NextEra Energy Resources, LLC					X												
60.	Individual	Michael Gammon	Kansas City Power & Light	X		X		X	X											
61.	Individual	Paul McClay	Tampa Electric Company	X		X		X	X											
62.	Individual	Thad Ness	American Electric Power (AEP)	X		X		X	X											

**Consideration of Comments for Project 2008-06 — Cyber Security Order 706 (CIP Version 2 VSLs and VRFs)**

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		Commenter	Organization	Industry Segment										
				1	2	3	4	5	6	7	8	9	10	
63.	Individual	Michael P Mertz	Southern California Edison Company	X		X		X	X					

- \*Group 1 — IRC Standards Review Committee
- \*Group 2 — Bonneville Power Administration
- \*Group 3 — Northeast Power Coordinating Council
- \*Group 4 — MRO NERC Standards Review Subcommittee

1. Please review the proposed incremental changes made to the version 1 VSLs to create a set of version 2 VSLs that is compatible with the version 2 CIP-002-2 through CIP-009-2 standards as posted for industry pre-ballot review commencing March 3, 2009. Then in the following table, please provide alternate language for any of the incremental changes to the VSLs that you disagree with. Please be sure to identify the standard number and requirement number for each proposed revision.

**Summary Consideration:** Based on stakeholder comments, the drafting team did make some changes to some of the sets of VSLs for CIP-002-2 (R4), CIP-003-2 (R 2.3 and R2.4), CIP-004-2 (R1 and R2.1), CIP-005-2 (R2,3), and CIP-006-2 (R1.1 and R1.4).

No changes were made to VSLs for CIP-007-2, CIP-008-2 or for CIP-009-2.

Most changes were either clarifying or format changes. In some cases, stakeholders identified additional descriptions of noncompliant performance that could be used to add more options to the already proposed VSLs – and where the proposed VSLs met the definitions for the proposed VSL category, the proposed VSLs were adopted.

All Changes Proposed by Stakeholders for VSLs for CIP-002-2 Cyber Security - Critical Cyber Asset Identification					
Company	R #	Alternate Lower VSL	Alternate Moderate VSL	Alternate High VSL	Alternate Severe VSL
BPA	R4			The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s)'s annual approval of two or more of the following: 1) The risk-based assessment methodology for the identification of Critical Assets, 2) the list of Critical Assets and 3) the list of Critical Cyber Assets (even if such lists are null.)	The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s) annual approval of 1) A risk based assessment methodology for identification of Critical Assets, 2) a signed and dated approval of the list of Critical Assets, or 3) a signed and dated approval of the list of Critical Cyber Assets (even if such lists are null.)
<b>Response:</b> Thank you for your comment, your suggested changes are being accepted.					

All Changes Proposed by Stakeholders for VSLs for CIP-003-2 Cyber Security – Security Management Controls					
Company	R #	Alternate Lower VSL	Alternate Moderate VSL	Alternate High VSL	Alternate Severe VSL
BPA	R2.3			Changes to the delegated authority are not documented within thirty calendar days of the effective date.	A senior manager's delegate is not identified by name, title, and date of designation; the document delegating the authority does not identify the authority being delegated; the document delegating the authority is not approved by the senior manager.
<p><b>Response:</b> Thank you for your comments. The drafting team has considered your suggested change to have additional levels of severity and has revised the VSLs for this requirement.</p>					
BPA	R2.4				Exceptions from the requirements of the cyber security policy were not authorized by the senior manager or delegate(s) and documented as required.
<p><b>Response:</b> Thank you for your comment. Since the language of the requirement did not change between version one and version 2, the drafting team elected to maintain the version 1 VSL language for consistency for version 1 VSLs.</p>					

All Changes Proposed by Stakeholders for VSLs for CIP-004-2 Cyber Security – Personnel & Training					
Company	R #	Alternate Lower VSL	Alternate Moderate VSL	Alternate High VSL	Alternate Severe VSL
NPCC	R1	should use the same wording as the Standard as in “and implemented”	should use the same wording as the Standard as in “and implemented”	should use the same wording as the Standard as in “and implemented”	should use the same wording as the Standard as in “and implemented”
<p><b>Response:</b> Thank you for your comment. The VSLs have been modified to reflect the language of the requirement.</p>					
BPA	R 2.1	At least one individual but less than 5% of personnel having <b>unescorted</b> access to Critical Cyber Assets, including contractors and service vendors, were not trained prior to their being granted such access except in specified circumstances such as an emergency.	At least 5% but less than 10% of all personnel having <b>unescorted</b> access to Critical Cyber Assets, including contractors and service vendors, were not trained prior to their being granted such access except in specified circumstances such as an emergency.	At least 10% but less than 15% of all personnel having <b>unescorted</b> access to Critical Cyber Assets, including contractors and service vendors, were not trained prior to their being granted such access except in specified circumstances such as an emergency.	15% or more of all personnel having <b>unescorted</b> access to Critical Cyber Assets, including contractors and service vendors, were not trained prior to their being granted such access except in specified circumstances such as an emergency.
<p><b>Response:</b> Thank you for your comment. The language of the VSLs has been revised as suggested.</p>					

All Changes Proposed by Stakeholders for VSLs for CIP-005-2 Cyber Security – Electronic Security Perimeter(s)					
Company	R #	Alternate Lower VSL	Alternate Moderate VSL	Alternate High VSL	Alternate Severe VSL
BPA	R 2.3			The Responsible Entity did implement but did not maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s) where applicable.	The Responsible Entity did not implement <b>and</b> maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s) where applicable.
Response: Thank you for your comment. The language of the VSL has been revised to include your suggestion.					

All Changes Proposed by Stakeholders for VSLs for CIP-006-2 Cyber Security – Physical Security of Physical Cyber Assets					
Company	R #	Alternate Lower VSL	Alternate Moderate VSL	Alternate High VSL	Alternate Severe VSL
BPA	R 1.1		Where a completely enclosed (“six-wall”) border cannot be established, the Responsible Entity has deployed but not documented alternative measures to control physical access to Cyber Assets <b>within the Electronic Security Perimeter.</b>	Where a completely enclosed (“six-wall”) border cannot be established, the Responsible Entity has not deployed alternative measures to control physical access to Cyber Assets <b>within the Electronic Security Perimeter.</b>	The Responsible Entity's physical security plan does not include processes to ensure and document that all Cyber Assets within an Electronic Security Perimeter also reside within an identified Physical Security Perimeter.  OR  Where a completely enclosed (“six-wall”) border cannot be established, the Responsible Entity has not deployed and

All Changes Proposed by Stakeholders for VSLs for CIP-006-2 Cyber Security – Physical Security of Physical Cyber Assets					
Company	R #	Alternate Lower VSL	Alternate Moderate VSL	Alternate High VSL	Alternate Severe VSL
					documented alternative measures to control physical <b>access</b> to Cyber Assets <b>within the Electronic Security Perimeter</b> .
<b>Response:</b> Thank you for your comment. The language of the VSL has been revised to include your suggestion.					
BPA	R1.4				The Responsible Entity's physical security plan does not address the appropriate use of physical access controls as described in Requirement R4.
<b>Response:</b> Thank you for your comment. The language of the VSL has been revised to include your suggestion.					
NPCC	R1.7	should use the same wording as the Standard	should use the same wording as the Standard	should use the same wording as the Standard	should use the same wording as the Standard
<b>Response:</b> Thank you for your comment. The drafting team believes the posted language is sufficient.					
Exelon	R2				Remove the sentence that appears prior to the OR statement as it is not necessary since it is covered by the other VSLs in this requirement. Sentence to eliminate is as follows: <b>A Cyber Asset that</b>

All Changes Proposed by Stakeholders for VSLs for CIP-006-2 Cyber Security – Physical Security of Physical Cyber Assets					
Company	R #	Alternate Lower VSL	Alternate Moderate VSL	Alternate High VSL	Alternate Severe VSL
					authorizes and/or logs access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers, was not protected from unauthorized physical access.
<p><b>Response:</b> Thank you for your comments. The drafting team did not make any changes to the VSLs since the levels of VSLs are not duplicated.</p>					
BPA	R7			<b>The responsible entity did not retain physical access logs for at least ninety calendar days.</b>	The Responsible Entity did not retain electronic access logs <b>related to reportable incidents</b> in accordance with the requirements of Standard CIP-008-2.
<p><b>Response:</b> Thank you for your comments. Since the technical language did not change, the drafting team has revised the VSLs to be consistent with version 1.</p>					

**2. Do you agree with the VRFs proposed for the version 2 CIP standards? If not, please identify which VRFs you disagree with and identify why.**

**Summary Consideration:** All commenters except for one indicated agreement with the VRFs that were proposed, therefore the drafting team did not make any changes to the VRFs.

Organization	Yes or No	Question 3 Comment
Tampa Electric	Disagree	Time did not permit review, therefore we cannot agree at this time.
Exelon	Agree	
IESO	Agree	
BPA	Agree	
NPCC	Agree	
MRO NERC Standards Review Subcommittee	Agree	
Kansas City Power & Light	Agree	
IRC Standards Review Committee	Agree	
Southern California Edison Company	Agree	

**3. If there any other comments you wish to provide (relative to the VSLs for CIP-002-2 through CIP-009-2) to the standard drafting team for Project 2008-06 Cyber Security Order 706 (version 2 VSLs) that you have not already provided in responses to the questions above, please provide them here.**

**Summary Consideration:** Based on stakeholder comments, the drafting team did make some changes to some of the sets of VSLs for CIP-002-2 (R4), CIP-003-2 (R 2.3 and R2.4), CIP-004-2 (R1 and R2.1), CIP-005-2 (R2,3), and CIP-006-2 (R1.1 and R1.4).

No changes were made to VSLs for CIP-007-2, CIP-008-2 or for CIP-009-2.

Most changes were either clarifying or format changes. In some cases, stakeholders identified additional descriptions of noncompliant performance that could be used to add more options to the already proposed VSLs – and where the proposed VSLs met the definitions for the proposed VSL category, the proposed VSLs were adopted.

Some commenters proposed modifications to requirements, and this is outside the scope of this VSL and VRF effort. Additional modifications to the requirements will be addressed in the next phase of modifications to the set of CIP standards.

Organization	Question 6 Comment
IESO	<p>Table 2, attached provides a summary assessment of the VRFs and VSLs for the Version 2 CIP standards. Examples cited in the comments below can be found in table 2.</p> <p>Similar problems as identified for the Version 1 CIP standards VSLs are also identified among the VSLs for the Version 2 CIP standards. An added inconsistency is the removal of some of the VSLs for the subrequirements after they are rolled-up to the main requirement. Examples re R2, R6 and R8 in CIP-006-2.</p> <p>Some subrequirements have become bullets. The main requirements' VSLs are dependent on which of the bulleted items are not complied with. It suggests that the bulleted items should in fact be subrequirements (conditions to meet the main requirement). We speculate that the SDT's intent is to roll-up non-compliance of subrequirements to the main requirement's VSLs, the approach is proper but this does not need a change from subrequirements to bullets. The latter is appropriate when the items are not required to be met, but rather they are listed as options or examples.</p>
<p><b>Response:</b> Thank you for your comment.</p> <p>1. The roll up approach is used where appropriate to address industry concerns including the concern of double jeopardy. (Double jeopardy is assigning a penalty for violating a sub-requirement to both the sub-requirement and the primary requirement.)</p>	

Organization	Question 6 Comment
BPA	<p data-bbox="71 237 1108 264">2. Further concern on this topic should be raised through the standards drafting process.</p> <p data-bbox="422 302 527 326"><b>General:</b></p> <p data-bbox="422 347 1927 407">Several of the VSLs for the version 2 standards include “(implemented)” after “established.” It is unclear why the parentheses are necessary and why the VSL does not just state “established and implemented.”</p> <p data-bbox="422 423 590 448"><b>CIP-002-2, R4</b></p> <p data-bbox="422 472 2028 532">1. There doesn't seem to be any substantive difference between High and Severe. In fact High indicates that you don't have any of the 3. Severe indicates that they don't have 2 or more, which could actually be less severe than the High. They seem to be reversed.</p> <p data-bbox="422 548 2001 609">Our first suggestion therefore is that the definitions be switched so that the more egregious violation is listed under Severe and the less egregious is placed in the High.</p> <p data-bbox="422 625 2028 805">2. The proposed language change is cumbersome and could lead to a misinterpretation that a risk based methodology is used to identify Critical Cyber Assets. This would be incorrect. The basis for selection of Critical Cyber Assets is their presence within a Critical Asset, whether they are essential to the reliable operation of the Critical Asset and whether they meet the requirements of R3.1, or R3.2, or R3.3. There is no assessment involved that is a pure yes or no process. The risk-based methodology applies to the Critical Assets. We also recommend numbering each of the required elements to make it even clearer. The suggested replacements below are a bit longer, but make it clearer what the VSL statement is saying.</p> <p data-bbox="422 821 1335 849">Note: The definitions are also reversed to put them into the proper categories.</p> <p data-bbox="422 870 2028 959"><b>Suggested Change High:</b> The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s)'s annual approval of two or more of the following: 1) The risk-based assessment methodology for the identification of Critical Assets, 2) the list of Critical Assets and 3) the list of Critical Cyber Assets (even if such lists are null.)</p> <p data-bbox="422 976 2028 1065"><b>Suggested Change Severe:</b> The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s) annual approval of 1) A risk based assessment methodology for identification of Critical Assets, 2) a signed and dated approval of the list of Critical Assets, or 3) a signed and dated approval of the list of Critical Cyber Assets (even if such lists are null.)</p> <p data-bbox="422 1081 621 1105"><b>CIP-003-2, R 2.3</b></p> <p data-bbox="422 1114 1476 1141">Suggest breaking it out into two VSLs – rather than having it all under “severe” (see table).</p> <p data-bbox="422 1174 621 1198"><b>CIP-004-2, R 2.1</b></p> <p data-bbox="422 1206 1518 1234">Suggest adding “unescorted” before “access” to align with wording in the standard (see table).</p> <p data-bbox="422 1266 621 1291"><b>CIP-005-2, R 2.3</b></p> <p data-bbox="422 1299 1791 1326">Suggest breaking it out into two VSLs – rather than having it all under “severe”. Also change “or” to “and” (see table).</p>

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Organization	Question 6 Comment
	<p><b>CIP-006-2, R1.1</b> Reads poorly, suggested rewording and including “within the Electronic Security Perimeter” to each VSL (see table).</p> <p><b>CIP-006-2, R 1.4</b> Typo – R3 should be R4 to match version 2 standard (see table).</p> <p><b>CIP-006-2, R 7</b> Added a high VSL to correlate to retention of electronic access logs for 90 days, and for severe VSL added “related to reportable incidents” before log (see table).</p>
<p><b>Response:</b> Thank you for your comments. The drafting team has addressed or responded to your specific concerns above in this consideration of comments document.</p>	
NPCC	<p>In CIP-004 the VSLs for R1 should use the same wording as the Standard. In CIP-006 the VSLs for R1.7 should use the same wording as the Standard.</p>
<p><b>Response:</b> Thank you for your comments. The drafting team has addressed or responded to your specific concerns above in this consideration of comments.</p>	
NextEra Energy Resources, LLC	<p>General comment for both VSL’s and VRF’s for CIP-006-2, Use of the term “continuous” under R1.6 will need clarification.</p>
<p><b>Response:</b> Thank you for your comments. Your concern is related to the language of the standard and should be addressed to the standards development process.</p>	
Tampa Electric	<p>We applaud the effort that has gone into this exercise. We know that it is not easy given the time constraints that NERC is facing. However, we feel the impact to the industry of these VSLs warrants that much more consideration be given to this project, and that time must be allowed to ensure that a quality product is delivered. We do not believe this document is at that point yet.</p> <p>NERC CIP drafting teams should give consideration to the number of items that they have out for review simultaneously at a time when the industry is working to meet the June and December 2009 compliance dates. We would have appreciated more time to review this, the TFE process, V2 of the standards, and all the new guidelines that were recently circulated.</p> <p>Additionally, we would like to know if the results and aggregated industry comments will be made available to the industry.</p>
<p><b>Response:</b> Thank you for your comments. All comments and results associated with CIP Version 2 VSLs and VRFs are available to the industry on the NERC website.</p>	
IRC Standards Review Committee	<p>Table 2, attached provides a summary assessment of the VRFs and VSLs for the Version 2 CIP standards. Examples cited in the comments below can be found in table 2. Similar problems as identified for the Version 1 CIP standards VSLs are also identified among</p>

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Organization	Question 6 Comment
	the VSLs for the Version 2 CIP standards.
<b>Response:</b> Thank you for your comments. Table 2 provides “observations” but does not appear to provide recommendations for revisions to specific VSLs.	

Additional Comments Submitted by the IRC Standards Review Committee and IESO				
Table 2 — Summary of Comments on VSLs for Version 1 CIP Standards				
Standard and Requirement	Changes in Requirement	Changes in VRFs	Changes in VSLs	Assessment
<b>CIP-002-2</b>				
R1 R1.1 R1.2 R1.2.1 R1.2.2 R1.2.3 R1.2.4 R1.2.5 R1.2.6 R1.2.7	None	None	None	This standard remains virtually the same as in Version 1 except some cosmetic changes in R4.
R2	None	None	None	
R3 R3.1 R3.2 R3.2	None	None	None	
R4	Cosmetic	None	Cosmetic	Conforming changes
<b>CIP-003-2</b>				

Additional Comments Submitted by the IRC Standards Review Committee and IESO				
Table 2 — Summary of Comments on VSLs for Version 1 CIP Standards				
Standard and Requirement	Changes in Requirement	Changes in VRFs	Changes in VSLs	Assessment
R1	None			
R1.1	None			
R1.2	None			
R1.3	None			
R2	Cosmetic	None	Cosmetic	Conforming changes
R2.1	Cosmetic	None	Cosmetic	Conforming changes
R2.2	None			
R2.3	New	Lower	New	Binary VSL: Severe only.
<b>Response:</b> Thank you for your comments.				
R2.4	None	Lower	New	VRF Same as R2.3 in V1; Binary VSL: Severe only.
<b>Response:</b> Thank you for your comments.				
R3	None			
R3.1	None			
R3.2	Cosmetic	None	Cosmetic	Conforming changes
R3.3	None			

**Additional Comments Submitted by the IRC Standards Review Committee and IESO**

Table 2 — Summary of Comments on VSLs for Version 1 CIP Standards

Standard and Requirement	Changes in Requirement	Changes in VRFs	Changes in VSLs	Assessment
R4	None			
R4.1	None			
R4.2	None			
R4.3	None			
R5	None			
R5.1	None			
R5.2	None			
R5.3	None			
R6	None			
<b>CIP-004-2</b>				
R1	Cosmetic	None	Cosmetic	Conforming changes
R2	Minor wording	None	Minor	Conforming changes
R2.1	Minor wording	None	Minor	Conforming changes
R2.2 R2.2.1-R2.2.4	None			
R2.3	None			

**Additional Comments Submitted by the IRC Standards Review Committee and IESO**

Table 2 — Summary of Comments on VSLs for Version 1 CIP Standards

<b>Standard and Requirement</b>	<b>Changes in Requirement</b>	<b>Changes in VRFs</b>	<b>Changes in VSLs</b>	<b>Assessment</b>
R3	Minor wording	None	Minor	Conforming changes
R3.1	None			
R3.2	None			
R3.3	None			
R4	None			
R4.1	None			
R4.2	None			
<b>CIP-005-2</b>				
R1	None			
R1.1	None			
R1.2	None			
R1.3	None			
R1.4	None			
R1.5	Cosmetic	None	Cosmetic	Conforming changes
R1.6	None			

Additional Comments Submitted by the IRC Standards Review Committee and IESO				
Table 2 — Summary of Comments on VSLs for Version 1 CIP Standards				
Standard and Requirement	Changes in Requirement	Changes in VRFs	Changes in VSLs	Assessment
R2	None			
R2.1	None			
R2.2	None			
R2.3	Cosmetic	None	Cosmetic	Conforming changes
R2.4	None			
R2.5	None			
R2.6	None			
R3	None			
R3.1	None			
R3.2	None			
R4	None			
R4.1	None			
R4.2	None			
R4.3	None			
R4.4	None			

Additional Comments Submitted by the IRC Standards Review Committee and IESO				
Table 2 — Summary of Comments on VSLs for Version 1 CIP Standards				
Standard and Requirement	Changes in Requirement	Changes in VRFs	Changes in VSLs	Assessment
R4.5	None			
R5	Cosmetic		None	
R5.1	Cosmetic		None	
R5.2	None			
R5.3	Cosmetic		None	
<b>CIP-006-2</b>				
R1	Minor wording	None	Minor	Conforming changes
R1.1	Minor wording	None	Minor	Conforming changes
R1.2	Cosmetic	None	Minor	Conforming changes
R1.3	None			
R1.4	Cosmetic	None	Minor	Conforming changes
R1.5	Cosmetic	None	Minor	Conforming changes
R1.6	Reworded	None	Minor	Conforming changes
R1.7	Minor wording	None	Minor	Conforming changes
R1.8	New	Lower	New	VRF same as R1.9 in V1; Binary VSL: Severe only.

Additional Comments Submitted by the IRC Standards Review Committee and IESO				
Table 2 — Summary of Comments on VSLs for Version 1 CIP Standards				
Standard and Requirement	Changes in Requirement	Changes in VRFs	Changes in VSLs	Assessment
<b>Response:</b> Thank you for your comments.				
R2	New	Medium	New	VSL has 4 levels whose assignments are dependent on meeting requirements in other CIP standards. This can be an issue.
<b>Response:</b> Thank you for your comments.				
R2.1	New	Medium	Removed	Rolled up to R2; but it has a VRF which by the general rule has to have a VSL!
<b>Response:</b> Thank you for your comments. The roll up approach is used where appropriate to address industry concerns including the concern of double jeopardy. (Double jeopardy is assigning a penalty for violating a sub-requirement to both the sub-requirement and the primary requirement.)				
R2.2	New	Medium	Removed	Rolled up to R2; but it has a VRF which by FERC's rule has to have a VSL!
<b>Response:</b> Thank you for your comments. The roll up approach is used where appropriate to address industry concerns including the concern of double jeopardy. (Double jeopardy is assigning a penalty for violating a sub-requirement to both the sub-requirement and the primary requirement.)				
R3	New	Medium	New	VRF is new; Binary VSL: Severe only.
<b>Response:</b> Thank you for your comments.				
R4	None (formerly R2)	Medium	Changed from VSLs for former R2).	VRF similar to R2 in V1; 3 VSLs from Moderate to Severe depending on which bulleted items the entity fails to implement. This suggests that the bulleted items should have remained as subrequirements.
<b>Response:</b> Thank you for your comments. Further concern on this topic should be raised through the standards drafting process.				

Additional Comments Submitted by the IRC Standards Review Committee and IESO				
Table 2 — Summary of Comments on VSLs for Version 1 CIP Standards				
Standard and Requirement	Changes in Requirement	Changes in VRFs	Changes in VSLs	Assessment
R4.1–R4.4	Become bullets			See above comment.
<b>Response:</b> See response above.				
R5	None (formerly R3)	Medium	Changed from VSLs for former R3)	VRF similar to R3 in V1; 3 VSLs from Moderate to Severe depending on which bulleted items the entity fails to implement. This suggests that the bulleted items should have remained as subrequirements.
<b>Response:</b> Thank you for your comments Further concern on this topic should be raised through the standards drafting process.				
R5.1-R5.2	Become bullets			
R6	None (Formerly R4)	Lower	Changed from VSLs for former R4)	VRF similar to R4 in V1; 4 VSLs depending on which bulleted items the entity fails to implement. This suggests that the bulleted items should have remained as subrequirements.
<b>Response:</b> Thank you for your comments. Further concern on this topic should be raised through the standards drafting process.				
R6.1-R6.3	Become bullets			
R7	None (Formerly R5)	Lower	Similar to VSLs for former R5)	VRF similar to R5 in V1; Binary VSL: Severe only.
<b>Response:</b> Thank you for your comment.				
R8	Cosmetic (Formerly R6)	Medium	Similar to VSLs for former R6)	VRF similar to R6 in V1; 4 VSLs depending on which subrequirements the entity fails to comply.

Consideration of Comments for Project 2008-06 — Cyber Security Order 706 (CIP Version 2 VSLs and VRFs)

Additional Comments Submitted by the IRC Standards Review Committee and IESO				
Table 2 — Summary of Comments on VSLs for Version 1 CIP Standards				
Standard and Requirement	Changes in Requirement	Changes in VRFs	Changes in VSLs	Assessment
<b>Response:</b> Thank you for your comment.				
R8.1	None	Medium	Removed	VRF similar to R6.1 in V1; Rolled up to R8 so there are no VSLs assigned; but it has a VRF which by FERC's rule has to have a VSL!
<b>Response:</b> Thank you for your comments. The roll up approach is used where appropriate to address industry concerns including the concern of double jeopardy. (Double jeopardy is assigning a penalty for violating a sub-requirement to both the sub-requirement and the primary requirement.)				
R8.2	Cosmetic	Lower	Removed	VRF similar to R6.2 in V1; Rolled up to R8 so there are no VSLs assigned; but it has a VRF which by FERC's rule has to have a VSL!
<b>Response:</b> Thank you for your comments. The roll up approach is used where appropriate to address industry concerns including the concern of double jeopardy. (Double jeopardy is assigning a penalty for violating a sub-requirement to both the sub-requirement and the primary requirement.)				
R8.3	None	Lower	Removed	VRF similar to R6.3 in V1; Rolled up to R8 so there are no VSLs assigned; but it has a VRF which by FERC's rule has to have a VSL!
<b>Response:</b> Thank you for your comments. The roll up approach is used where appropriate to address industry concerns including the concern of double jeopardy. (Double jeopardy is assigning a penalty for violating a sub-requirement to both the sub-requirement and the primary requirement.)				
<b>CIP-007-2</b>				
R1	Cosmetic	None	None	None
R1.1	None			

Additional Comments Submitted by the IRC Standards Review Committee and IESO				
Table 2 — Summary of Comments on VSLs for Version 1 CIP Standards				
Standard and Requirement	Changes in Requirement	Changes in VRFs	Changes in VSLs	Assessment
R1.2	None			
R1.3	None			
R2	Cosmetic	None	Minor	Conforming changes
R2.1	None	None	None	None
R2.2	None	None	None	None
R2.3	Minor wording	None	None	None
R3	Cosmetic	None	Minor	Conforming changes
R3.1	None	None	None	None
R3.2	Minor wording	None	None	None
R4	None			
R4.1	Minor wording	None	Minor	Conforming changes
R4.2	None			
R5	None			
R5.1	None			
R5.1.1	None			

Additional Comments Submitted by the IRC Standards Review Committee and IESO				
Table 2 — Summary of Comments on VSLs for Version 1 CIP Standards				
Standard and Requirement	Changes in Requirement	Changes in VRFs	Changes in VSLs	Assessment
R5.1.2	None			
R5.1.3	Cosmetic	None	Minor	Conforming changes
R5.2	None			
R5.2.1	None			
R5.2.2	None			
R5.2.3	None			
R5.3	None			
R5.3.1	None			
R5.3.2	None			
R5.3.3	None			
R6	None			
R6.1	None			
R6.2	None			
R6.3	None			
R6.4	None			

**Additional Comments Submitted by the IRC Standards Review Committee and IESO**

Table 2 — Summary of Comments on VSLs for Version 1 CIP Standards

Standard and Requirement	Changes in Requirement	Changes in VRFs	Changes in VSLs	Assessment
R6.5	None			
R7	Cosmetic	None	Minor	Conforming changes
R7.1	None			
R7.2	None			
R7.3	None			
R8	None			
R8.1	None			
R8.2	None			
R8.3	None			
R8.4	None			
R9	Cosmetic	None	Minor	Conforming changes
<b>CIP-008-2</b>				
R1	Wording changes	None	Minor	Conforming changes
R1.1	None			
R1.2	Minor wording			

Additional Comments Submitted by the IRC Standards Review Committee and IESO				
Table 2 — Summary of Comments on VSLs for Version 1 CIP Standards				
Standard and Requirement	Changes in Requirement	Changes in VRFs	Changes in VSLs	Assessment
R1.3	None			
R1.4	Cosmetic			
R1.5	None			
R1.6	Major changes			
R2	None			
<b>CIP-009-2</b>				
R1	None			
R1.1	None			
R1.2	None			
R2	None			
R3	Cosmetic	None	Minor	Conforming changes
R4	None			
R5	None			