

Consideration of Comments on 1st Draft of Cyber Security Violation Severity Levels SAR — Project 2008-14

The Cyber Security Violation Severity Levels (VSLs) Drafting Team thanks all commenters who submitted comments on the first draft of the SAR. This SAR was posted for a 30-day public comment period from January 12, 2009 through February 10, 2009. The stakeholders were asked to provide feedback on the SAR through a special Electronic Comment Form. There were 26 sets of comments, including comments from more than 70 different people from approximately 50 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

http://www.nerc.com/filez/standards/Project2008-14_Cyber_Security_VSLDT.html

The drafting team made the following changes to the SAR based on stakeholder comments:

Revised the applicability section to clarify that the team is not developing VSLs that will be applicable to any of the following functional entities:

- Planning Coordinator
- Resource Planner
- Transmission Planner
- Distribution Provider
- Purchasing-Selling Entity
- Market Planner

Modified the Reliability and Market Principles section of the SAR to clarify that the proposed VSLs are applicable to Reliability Principles 7 and 8:

- 7 The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis.
- 8 Bulk power systems shall be protected from malicious physical or cyber attacks.

Revised the Brief and Detailed Descriptions to reflect the Project 2008-14 drafting team will develop VSLs for both Version 1 and Version 2 of standards CIP-002 through CIP-009.

No other changes were made to the SAR.

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. In addition, there is a NERC Reliability Standards Appeals Process.¹

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

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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	Guy Zito	NPCC												X
	Additional Member	Additional Organization	Region	Segment Selection											
	1 Al Adamson	New York State Reliability Council	NPCC	10											
	2 Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10											
	3 Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10											
	4 Brian Hogue	Northeast Power Coordinating Council	NPCC	10											
2.	Group	Roman Carter	Southern Company Transmission		X		X								
	Additional Member	Additional Organization	Region	Segment Selection											
	1 Marc Butts	Southern	SERC	1											

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	Commenter	Organization	Industry Segment																		
			1	2	3	4	5	6	7	8	9	10									
	. 2 . JT Wood	Transmission Southern Transmission	SERC 1																		
	. 3 . Jim Busbin	Southern Transmission	SERC 1																		
	. 4 . Raymond Vice	Southern Transmission	SERC 1																		
3.	Group	Richard Kafka	Pepco Holdings, Inc — Affiliates	X		X		X	X												
	Additional Member	Additional Organization	Region	Segment Selection																	
	. 1 . Mark Godfrey	Pepco Holdings, Inc.	RFC	1, 3																	
4.	Group	Jeri Domingo-Brewer, Chair	Project 2008-06 — Cyber Security Order 706 Standards Drafting Team	X	X	X	X	X									X	X			
	Additional Member	Additional Organization	Region	Segment Selection																	
	1. 2. 3. 4. 5. 6. 7. 8. 9. 10 .	Kevin Perry Jon Stanford Rob Antonishen Sharon Edwards Jay Cribb Joe Doetzl Scott Fixmer David Revill Philip Huff Tom Hofstetter	Southwest Power Pool Bonneville Power Administration Ontario Power Generation Duke Energy Southern Company Kansas City Power & Light Exelon Georgia Transmission Corporation Arkansas Electric Cooperative Corporation Midwest ISO	SPP WECC NPCC SERC SERC SPP ERCOT SERC SPP MRO	2, 10 1, 3 5 1, 3, 5 1, 3, 5 1, 3, 5 1, 3, 5 1 4 2																

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	Commenter	Organization	Industry Segment																	
			1	2	3	4	5	6	7	8	9	10								
11	Chris Peters	ICF International	ERCOT	NA																
12	Keith Stoffer	National Institute of Standards and Technology	NA - Not Applicable	NA																
13	Gerry Freese	American Electric Power	RFC	5, 1, 3																
5.	Group	Mike Davis	WECC Reliability Coordination																	X
6.	Group	Denise Koehn	Bonneville Power Administration	X		X		X	X											
	Additional Member	Additional Organization	Region	Segment Selection																
1	Pete Jeter	Office of Security	WEC C	1, 3, 5, 6																
2	Erik Smith	Office of Security	WEC C	1, 3, 5, 6																
3	Curt Wilkins	Transmission System Operations	WEC C	1																
4	Kevin Dorning	Transmission Technical Services	WEC C	1																
5	Kelly Hazelton	Tx Control Cntr HW Design & Maint	WEC C	1																
7.	Group	Michael Gammon	Kansas City Power & Light	X		X		X	X											
	Additional Member	Additional Organization	Region	Segment Selection																
1	Joe Doetzl	KCPL	SPP	1, 3, 5, 6																
2	Scott Harris	KCPL	SPP	1, 3, 5, 6																

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		Commenter	Organization	Industry Segment										
				1	2	3	4	5	6	7	8	9	10	
8.	Group	Sam Ciccone	FirstEnergy	X		X	X	X	X					
	Additional Member	Additional Organization	Region	Segment Selection										
	1 .	Doug Hohlbaugh	FE	RFC	1, 3, 4, 5, 6									
	2 .	Dave Folk	FE	RFC	1, 3, 4, 5, 6									
9.	Group	Ben Li	ISO/RTO Council Standards Review Committee (SRC)		X									
	Additional Member	Additional Organization	Region	Segment Selection										
	1 .	Anita Lee	AESO	WECC	2									
	2 .	James Castle	NYISO	NPCC	2									
	3 .	Matt Goldberg	ISO-NE	NPCC	2									
	4 .	Bill Phillips	MISO	MRO	2									
	5 .	Stever Myers	ERCOT	ERCOT	2									
	6 .	Charles Yeung	SPP	SPP	2									
	7 .	Lourdes Estrada-Saliner	CAISO	WECC	2									
	8 .	Pat Brown	PJM	RFC	2									
10.	Group	Michael Brytowski	MRO NERC Standards Review											

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		Commenter	Organization	Industry Segment											
				1	2	3	4	5	6	7	8	9	10		
			Subcommittee												
		Additional Member	Additional Organization	Region	Segment Selection										
		1. Carol Gerou	MP		1,3,5,6										
		2. Neal Balu	WPS		3,4,5,6										
		3. Terry Bilke	MISO		2										
		4. Joe DePoorter	MGE		3,4,5,6										
		5. Ken Goldsmith	ALTW		4										
		6. Jim Haigh	WAPA		1,6										
		7. Terry Harbour	MEC		1,3,5,6										
		8. Joseph Knight	GRE		1,3,5,6										
		9. Scott Nickels	RPU		3,4,5,6										
		10. Dave Rudolph	BEPC		1,3,5,6										
		11. Eric Ruskamp	LES		1,3,5,6										
		12. Pam Sordet	XCEL		1,3,5,6										
11.	Individual	Dan Rochester	Independent Electricity System Operator		X										
12.	Individual	Kyle Hussey	Public Utility District #2 of Grant County	X		X		X					X		
13.	Individual	Gordon Rawlings	BC Transmission Corp.	X	X										
14.	Individual	Richard McLeon	South Texas Electric Cooperative, Inc.	X				X							
15.	Individual	James H. Sorrels, Jr.	American Electric Power	X		X		X	X						
16.	Individual	Martyn Turner	LCRA Transmission Services Corporation	X											

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		Commenter	Organization	Industry Segment											
				1	2	3	4	5	6	7	8	9	10		
17.	Individual	Guy Andrews	Georgia System Operations Corporation			X									
18.	Individual	Eric Olson	Transmission Agency of Northern California	X											
19.	Individual	Denise Roeder	North Carolina Municipal Power Agency #1			X	X		X						
20.	Individual	Alan Gale	City of Tallahassee (TAL)					X							
21.	Individual	Dave DeGroot	Austin Energy					X							
22.	Individual	Patrick Wheeler - Information Technology Manager	Modesto Irrigation District	X		X									
23.	Individual	Greg Rowland	Duke Energy	X		X		X	X						
24.	Individual	Bob Thomas	Illinois Municipal Electric Agency				X								
25.	Individual	Rick White	Northeast Utilities	X											
26.	Individual	Dave Norton	Entergy Transmission, Policy	X		X		X							

1. Do you agree that the scope of the proposed standards action addresses the directive to “. . . file Violation Severity Levels before the auditably compliant stage” which is July 1, 2009?

Summary Consideration: All commenters agreed that the scope of the proposed standards action does address the directive to file VSLs before the auditably compliant stage of July 1, 2009. No changes were made to the SAR based on the affirmative comments provided.

Organization	Yes or No	Question 1 Comment
Bonneville Power Administration	Yes	The scope of the SAR appears to confine itself to the FERC requirement.
Response: Agreed.		
Public Utility District #2 of Grant County	Yes	May not necessarily be the direction of the proposal, but the proposition only address's the need for the change from a "Levels of Non-compliance" to a structure of "Violation Severity Levels, However this document does not define the Violation Severity Levels themself.
Response: There are already guidelines on setting VSLs.		
Entergy Transmission, Policy	Yes	Entergy has no comments concerning this SAR.
Southern Company Transmission	Yes	
Pepco Holdings, Inc - Affiliates	Yes	
WECC Reliability Coordination	Yes	
Kansas City Power & Light	Yes	
FirstEnergy	Yes	

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Organization	Yes or No	Question 1 Comment
ISO/RTO Council Standards Review Committee (SRC)	Yes	
MRO NERC Standards Review Subcommittee	Yes	
Independent Electricity System Operator	Yes	
BC Transmission Corp.	Yes	
South Texas Electric Cooperative, Inc.	Yes	
American Electric Power	Yes	
LCRA Transmission Services Corporation	Yes	
Georgia System Operations Corporation	Yes	
North Carolina Municipal Power Agency #1	Yes	
City of Tallahassee (TAL)	Yes	
Austin Energy	Yes	
Modesto Irrigation District	Yes	

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Organization	Yes or No	Question 1 Comment
Duke Energy	Yes	
Illinois Municipal Electric Agency	Yes	
Northeast Utilities	Yes	

2. The scope of the proposed standards action is limited to adding VSLs to the already approved CIP-002-1 through CIP-009-1, but does not include any other revisions. (Other revisions to this set of standards are being developed under Project 2008-06.) Do you agree with the scope of the proposed standards action?

Summary Consideration: While most commenters agreed that the scope of the SAR is appropriate, some commenters wanted this drafting team to also address developing VSLs for the next version of the CIP Standards. The Project 2008-14 drafting team agrees and will coordinate drafting of VSLs for version 2 of the CIP Standards with the Project 2008-06 drafting team.

Organization	Yes or No	Question 2 Comment
Project 2008-06 - Cyber Security - Order 706 Standards Drafting Team	No	The Phase I changes (Version 2) to the CIP standards are expected to be balloted coincident with the development of the VSLs for Version 1 of the standards. The Project 2008-06 drafting team will not be in a position to include the VSLs with the revised standards due to the timing of the two projects. The VSL drafting team is best positioned to recommend VSLs in support of the Version 2 standards.
Response: The Project 2008-14 drafting team agrees with the Project 2008-06 drafting team and will coordinate with the Project 2008-06 drafting team to develop VSLs for the version 2 CIP standards.		
Kansas City Power & Light	No	The version 2 of the CIP standards has been posted for public comments. The changes from version 1 are minimal. The VSL team should develop VSLs for CIP-002-2 through CIP-009-2.
Response: The Project 2008-14 drafting team agrees with the Project 2008-06 drafting team and will coordinate with the Project 2008-06 drafting team to develop VSLs for the version 2 CIP standards.		
ISO/RTO Council Standards Review Committee (SRC)	No	The Phase I changes (Version 2) to the CIP standards are expected to be balloted coincident with the development of the VSLs for Version 1 of the standards. The Project 2008-06 drafting team will not be in a position to include the VSLs with the revised standards due to the timing of the two projects. Because of this, the VSL drafting team is best positioned to recommend VSLs in support of the Version 2 standards. The SAR should be expanded to include VSLs for the Phase I changes (Version 2) to the CIP standards.
Response: The Project 2008-14 drafting team agrees with the Project 2008-06 drafting team and will coordinate with the Project 2008-06 drafting team to develop VSLs for the version 2 CIP standards.		

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Organization	Yes or No	Question 2 Comment
Independent Electricity System Operator	No	The Phase I changes (Version 2) to the CIP standards are expected to be balloted coincident with the development of the VSLs for Version 1 of the standards. The Project 2008-06 drafting team will not be in a position to include the VSLs with the revised standards due to the timing of the two projects. Because of this, the VSL drafting team is best positioned to recommend VSLs in support of the Version 2 standards. The SAR should be expanded to include VSLs for the Phase I changes (Version 2) to the CIP standards.
<p>Response: The Project 2008-14 drafting team agrees with the Project 2008-06 drafting team and will coordinate with the Project 2008-06 drafting team to develop VSLs for the version 2 CIP standards.</p>		
Bonneville Power Administration	Yes	Yes - the SAR limits itself specifically to VSLs and no other changes.
<p>Response: Agreed.</p>		
Southern Company Transmission	Yes	
Pepco Holdings, Inc - Affiliates	Yes	
WECC Reliability Coordination	Yes	
FirstEnergy	Yes	
MRO NERC Standards Review Subcommittee	Yes	
Public Utility District #2 of Grant County	Yes	
BC Transmission Corp.	Yes	
South Texas Electric	Yes	

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Organization	Yes or No	Question 2 Comment
Cooperative, Inc.		
American Electric Power	Yes	
LCRA Transmission Services Corporation	Yes	
Georgia System Operations Corporation	Yes	
North Carolina Municipal Power Agency #1	Yes	
City of Tallahassee (TAL)	Yes	
Austin Energy	Yes	
Modesto Irrigation District	Yes	
Duke Energy	Yes	
Illinois Municipal Electric Agency	Yes	
Northeast Utilities	Yes	
Entergy Transmission, Policy	Yes	

3. The applicability of this SAR matches the applicability of the approved CIP-002-1 through CIP-009-1. Do you agree with the applicability of the proposed standards action?

Summary Consideration: Several commenters indicated that the SAR listed entities that are not identified in the applicability section of the approved CIP-002-1 through CIP-009-1. The commenters are correct – the applicability of this SAR should have been limited to just those functional entities identified as responsible entities in the approved standards. The SAR has been modified to remove the following from the applicability:

- Planning Coordinator
- Resource Planner
- Transmission Planner
- Distribution Provider
- Purchasing-Selling Entity
- Market Planner

In addition, one commenter pointed out that the VSLs apply to NERC and NERC was not added as NERC’s noncompliance is not addressed in the Sanctions Guidelines and the only reason for having VSLs is to support the assignment of penalties and sanctions in accordance with the Sanctions Guidelines.

Organization	Yes or No	Question 3 Comment
North Carolina Municipal Power Agency #1		The SAR shows applicability checked for some entities which are not listed in the applicability sections of the standards (e.g., Resource Planner). To be clear, the intent of this SAR is only to add the VSLs -- it will not make any changes to the applicability as currently shown in the standards (not in this SAR) -- correct?
Response: You are correct – the SAR has been revised to remove the functional entities that are not listed in the applicability section of the approved CIP standards.		
FirstEnergy	No	The Reliability Functions section of the SAR incorrectly references the Planning Coordinator, Resource Planner, Transmission Planner, Distribution Provider, Purchasing-Selling Entity as NERC Reliability Entities being impacted by the SAR. The currently approved version of the CIP standards do not apply to those entity classifications. Additionally, the Market Operator is checked as applicable entity but we do not believe that is appropriate as well. We are not sure how the Market Operator would be applicable to any NERC Reliability standard since it is not a registered entity classification. The approved standards also refer to NERC as being applicable, but this SAR does not address NERC.

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Organization	Yes or No	Question 3 Comment
<p>Response: You are correct – the SAR has been revised to remove the functional entities that are not listed in the applicability section of the approved CIP standards.</p>		
<p>Independent Electricity System Operator</p>	<p>No</p>	<p>Version 1 of the CIP standards is not applicable to Planning Coordinators, Resource Planners, Transmission Planners, Distribution Providers, Purchase-selling Entities, or Market Operators. They are applicable to NERC (the ERO). The same is true of Version 2 of the standards about to be balloted. In addition, Regional Reliability Organization is being re-designated to Regional Entity in Version 2 of the CIP standards. The VSLs should not be applicable to any entity not subject to the corresponding standard. Please clarify why the applicability is expanded.</p>
<p>Response: You are correct – the SAR has been revised to remove the functional entities that are not listed in the applicability section of the approved CIP standards.</p>		
<p>ISO/RTO Council Standards Review Committee (SRC)</p>	<p>No</p>	<p>Version 1 of the CIP standards is not applicable to Planning Coordinators, Resource Planners, Transmission Planners, Distribution Providers, Purchase-selling Entities, or Market Operators. They are applicable to NERC (the ERO). The same is true of Version 2 of the standards about to be balloted. In addition, Regional Reliability Organization is being re-designated to Regional Entity in Version 2 of the CIP standards. The VSLs should not be applicable to any entity not subject to the corresponding standard. Please clarify why the applicability is expanded.</p>
<p>Response: You are correct – the SAR has been revised to remove the functional entities that are not listed in the applicability section of the approved CIP standards.</p>		
<p>NPCC</p>	<p>No</p>	<p>The SAR applicability covers more Functions than the underlying Standards.</p>
<p>Response: You are correct – the SAR has been revised to remove the functional entities that are not listed in the applicability section of the approved CIP standards.</p>		
<p>American Electric Power</p>	<p>No</p>	<p>Please refer to section A4 of the standards. The applicability identified in the SAR differs from those identified in the standards. Additionally, NERC's responsibilities for the IDC should be identified as well as responsibilities of the regions.</p>
<p>Response: You are correct – the SAR has been revised to remove the functional entities that are not listed in the applicability section of the approved CIP standards. The SAR already identifies the RRO as a responsible entity. NERC's noncompliance is not addressed in the Sanctions Guidelines and the only reason for having VSLs is to support the assignment of penalties and sanctions in accordance with the</p>		

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Organization	Yes or No	Question 3 Comment
Sanctions Guidelines – so NERC was not added to the SAR.		
Transmission Agency of Northern California	No	The SAR states its only objective is to develop VSL assignments for the Cyber Security standards (CIP-002-1 through CIP-009-1) to replace the Levels of Non-Compliance. The SAR does not provide for adding new reliability functions to the Applicability Section of the Cyber Security standards. To be consistent with the SAR's sole objective, the SAR should only indicate the reliability functions for which the underlying Cyber Security standards apply. Specifically, the Cyber Security standards are not applicable to Transmission Planners; therefore, the SAR should not indicate the Cyber Security standards would apply to Transmission Planners.
Response: You are correct – the SAR has been revised to remove the functional entities that are not listed in the applicability section of the approved CIP standards.		
Modesto Irrigation District	No	The SAR should not be applicable to a “Responsible Entity” for which the CIP standard is not applicable such as Distribution Provider, Purchasing Selling Entity, Resource Planner and Transmission Planner. Since the proposed Violation Severity Levels are directly related to CIP standards and such standards identify applicability to a predefined group of entities, this SAR should not be applicable to entities not defined within the CIP standards. Such applicability would infer entities not identified within a CIP standard must comply with the standard.
Response: You are correct – the SAR has been revised to remove the functional entities that are not listed in the applicability section of the approved CIP standards.		
Illinois Municipal Electric Agency	No	The SAR indicates the standard/VSLs will apply to the RP, DP, and PSE functions. The approved CIP-002-1 through CIP-009-1 standards do not apply to these functions.
Response: You are correct – the SAR has been revised to remove the functional entities that are not listed in the applicability section of the approved CIP standards.		
WECC Reliability Coordination	No	
Northeast Utilities	Yes	While the Purpose and Detailed Description sections of the SAR properly limit the applicability to CIP-002 thru CIP-009; in the Reliability Functions section of the SAR PC, RP, TP, DP, & PSE are “checked off” and these functions are not listed in the Applicability sections of CIP-002 thru CIP-009. Is this correct?

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Organization	Yes or No	Question 3 Comment
<p>Response: You are correct – the SAR has been revised to remove the functional entities that are not listed in the applicability section of the approved CIP standards.</p>		
Bonneville Power Administration	Yes	VSLs apply to CIP-002-1 through CIP009-1. We assume that they will be transferred through to CIP-002-2 through CIP-009-2 and subsequent versions.
<p>Response: The drafting team expects that most of the version 1 VSLs will carry over and be used as version 2 VSLs, with new VSLs added where needed to reflect new or modified requirements in the version 2 standards.</p>		
Southern Company Transmission	Yes	
Pepco Holdings, Inc - Affiliates	Yes	
Kansas City Power & Light	Yes	
MRO NERC Standards Review Subcommittee	Yes	
Public Utility District #2 of Grant County	Yes	
BC Transmission Corp.	Yes	
South Texas Electric Cooperative, Inc.	Yes	
LCRA Transmission Services Corporation	Yes	
Georgia System Operations Corporation	Yes	

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Organization	Yes or No	Question 3 Comment
City of Tallahassee (TAL)	Yes	
Austin Energy	Yes	
Duke Energy	Yes	
Entergy Transmission, Policy	Yes	

4. If you have any other comments on this SAR that you have not provided above, please provide them here.

Summary Consideration: One commenter indicated that the SAR did not check applicable Market Interface Principles and Reliability Principles – and the SAR was revised to check the reliability principles in boxes 7 and 8 of the SAR. Some commenters indicated that posting the SAR with the proposed VSLs was a variance from the approved Reliability Standards Development Procedure and this is not correct. The Reliability Standards Development Procedure (RSDP) does allow a draft standard and a SAR to be submitted and approved for initial posting at the same time. The following is from the latest approved version of the RSDP:

Sequence Considerations: *Submitting a valid SAR is the first step in proposing a standard action. A requester may prepare a draft of the proposed standard action (Step 5), which the Standards Committee may authorize for concurrent posting with the SAR. This could be useful for a standard action with a clearly defined and limited scope or one for which stakeholder consensus on the need and scope is likely. Complex standards where broad debate of issues is required should be presented in two stages: the SAR first to get agreement on the scope and purpose, and the standard later in Step 6.*

Organization	Yes or No	Question 4 Comment
NPCC	Yes	This SAR should apply to ONLY the existing Cyber Security Standards (CIP-002-1 through CIP-009-1).
Response: The Project 2008-14 drafting team agrees with the Project 2008-06 drafting team and will coordinate with the Project 2008-06 drafting team to develop VSLs for the version 2 CIP standards. The scope of the Standard Authorization Request has been modified to reflect this change.		
Pepco Holdings, Inc - Affiliates	Yes	Reliability and Market Interface Principles, Applicable Reliability Principles, boxes 7 and 8 should be checked
Response: Agreed. The SAR was modified to check boxes 7 and 8 for the applicable principles.		
FirstEnergy	Yes	Under the "Detailed Description" section, we suggest striking the text "and any related FERC Orders or Rules" from the last sentence because it could potentially broaden the scope unintentionally. We believe the reference to Order 706 and the VSL Order sufficiently describes the task at hand.
Response: The team did not make the proposed change because a FERC Order may provide guidance on setting VSLs.		
ISO/RTO Council Standards Review		Concerned that initial Project 2008-14 SDT meetings and initial draft VSLs were completed and coordinated prior to approval of the SAR consistent with the NERC Standards Development Process. Is there a possibility

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Organization	Yes or No	Question 4 Comment
Committee (SRC)		that this variance from approved NERC SDP will adversely affect future enforcement actions based on the new VSLs once approve as mandatory and enforceable by Board of Trustees or FERC?
<p>Response: Note that the Reliability Standards Development Procedure (RSDP) does allow a draft standard and a SAR to be submitted and approved for initial posting at the same time. The following is from the latest approved version of the RSDP:</p> <p>Sequence Considerations: <i>Submitting a valid SAR is the first step in proposing a standard action. A requester may prepare a draft of the proposed standard action (Step 5), which the Standards Committee may authorize for concurrent posting with the SAR. This could be useful for a standard action with a clearly defined and limited scope or one for which stakeholder consensus on the need and scope is likely. Complex standards where broad debate of issues is required should be presented in two stages: the SAR first to get agreement on the scope and purpose, and the standard later in Step 6.</i></p>		
Independent Electricity System Operator	Yes	1) Concerned that initial Project 2008-14 SDT meetings and initial draft VSLs were completed and coordinated prior to approval of the SAR consistent with the NERC Standards Development Process. Is there a possibility that this variance from approved NERC SDP will adversely affect future enforcement actions based on the new VSLs once approve as mandatory and enforceable by Board of Trustees or FERC?
<p>Response: Note that the Reliability Standards Development Procedure (RSDP) does allow a draft standard and a SAR to be submitted and approved for initial posting at the same time. The following is from the latest approved version of the RSDP:</p> <p>Sequence Considerations: <i>Submitting a valid SAR is the first step in proposing a standard action. A requester may prepare a draft of the proposed standard action (Step 5), which the Standards Committee may authorize for concurrent posting with the SAR. This could be useful for a standard action with a clearly defined and limited scope or one for which stakeholder consensus on the need and scope is likely. Complex standards where broad debate of issues is required should be presented in two stages: the SAR first to get agreement on the scope and purpose, and the standard later in Step 6.</i></p>		
Public Utility District #2 of Grant County	Yes	I would hope that the auditing is reflective of obtaining the ultimate objective of providing the United States of America with a "Reliable" Electric system and the VSL's don't begin to become individualized to the point of creating "Unreliability" due to creating an enormous work force for the sole purpose of achieving compliance and not for the production, transmission, distribution, and maintenance of Electrical Energy.
<p>Response: VSLs categorize degrees of noncompliant performance and should be referenced by auditors “after” there has been a finding of noncompliance.</p>		
Entergy Transmission, Policy	No	No comment.

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Organization	Yes or No	Question 4 Comment
Kansas City Power & Light	No	No additional comments.
WECC Reliability Coordination	No	
Southern Company Transmission	No	
South Texas Electric Cooperative, Inc.	No	
American Electric Power	No	
LCRA Transmission Services Corporation	No	
Georgia System Operations Corporation	No	
City of Tallahassee	No	
Austin Energy	No	
Modesto Irrigation District	No	
Duke Energy	No	
Northeast Utilities	No	