

CAN Comment Form Compliance Application Notice – 00

Please complete the CAN Comment Form and email it to cancomments@nerc.net. Due to the amount of comments NERC receives, we will not accept attachments or comments submitted in another format.

Commenter Information

Name:

Phone Number:

Email Address:

Entity (ies) Represented:

Region(s):

Primary Interest Groups

Do you disagree with the groups mentioned? Yes or No

If yes, explain why:

Issue

Do you disagree with the issue statement of the CAN? Yes or No

If yes, explain why:

Background

Do you disagree with the background statement of the CAN? Yes or No
If yes, explain why:

Compliance Application

Do you disagree with the compliance application section of the CAN? Yes or No
If yes, explain why:

Effective Period for CAN

Do you disagree with the effective period of the CAN? Yes or No

If yes, explain why:

Evidence of Compliance

Do you disagree with the evidence of compliance mentioned in the CAN? Yes or No

If yes, explain why:

CAN-0031

While we appreciate NERC providing some flexibility in how compliance with the six-wall border requirement is met, we feel this is going beyond the scope of what can be discerned from the standard. Furthermore, the source documents seem to introduce even more ambiguity as to what type of materials might be acceptable for construction of your PSP. Instead, we propose that NERC provide clarification on what threat(s) an entity should be protecting against. Then an entity's chosen protective measures/materials could be tested against those threats. This method would be more effective in ensuring a secure environment, and would allow for the introduction of new materials and defense strategies as the industry and vendor products develop/mature.

Alice Murdock Ireland
Xcel Energy | Responsible By Nature



**Southern Company Comments on
CAN-0017 and CAN-0031
October 14, 2011**

Southern Company Services, Inc., for itself and on behalf of Alabama Power Company, Georgia Power Company, Gulf Power Company, Mississippi Power Company, and its other affiliates (collectively, "Southern Company") appreciates the opportunity to provide the following comments on proposed Compliance Application Notices ("CANs") -0017 & -0031.

General Comments

Southern Company respectfully requests that for all CANs, NERC implement a reasonable implementation period where Entities are afforded the ability to adjust their programs, policies, systems, or hardware to conform to newly defined or clarified requirements. To apply either retroactive enforcement or enforcement from the period of "Final Posting" is detrimental to the process of effectively ensuring reliability.

CAN Specific Comments

CAN-0017: CIP-007 (No Version Supplied) Requirement R5 – Technical and Procedural System Access and Password Controls

Southern Company concurs with the language provided in this CAN, with the following exception. Under the section entitled, "*Providing Evidence of Compliance, Password Controls – R5.3, item 2e.*", the given instruction that CEAs are to review "attestations from persons responsible for implementing and/or complying with the procedural solution" is not in line with the plain language of the approved standard. We respectfully request that, at a minimum, the language be amended to state that "attestations from persons responsible for implementing and/or overseeing compliance with the procedural solution."

CAN-0031: CIP-006 (No Version Supplied) Requirement R1 – Acceptable Opening Dimensions

Southern Company concurs, for the most part, with the language provided in this CAN. CAN-0031 provides applicable, measurable, and consistent direction that is commensurate with the physical security standards used by the Director of Central Intelligence, the Department of Homeland Security, and the Department of Defense.

However, we do not concur on the mandate provided in this CAN that "any opening greater than 96 square inches, with its shortest side greater than 6 inches in length, is protected against entry by the use of bars, wire mesh or other permanently installed metal barrier that leaves no opening greater than 6 inches on its shortest side." The use of the term "metal" should be removed to simply state "other permanently installed barrier." The Standards themselves do not dictate the type of material(s) that must be used to meet compliance, and various materials can be used to effectively meet the intent of the standard.

CAN Comment Form

CAN Number 0031

Please complete the CAN Comment Form and email it to cancomments@nerc.net.

Commenter Information

Name: David Thorne

Phone Number: 302-283-5718

Email Address: dkthorne@pepco.com

Entity (ies) Represented: Pepco Holdings Inc

Region(s): RFC

Primary Interest Groups

Do you disagree with the groups mentioned? Yes or No

If yes, explain why:

Issue

Do you disagree with the issue statement of the CAN? Yes or No

If yes, explain why:

Background

Do you disagree with the background statement of the CAN? Yes or No

If yes, explain why:

Compliance Application

Do you disagree with the compliance application section of the CAN? Yes or No

If yes, explain why:

Effective Period for CAN

Do you disagree with the effective period of the CAN? Yes or No

If yes, explain why:

Evidence of Compliance

Do you disagree with the evidence of compliance mentioned in the CAN? Yes or No

If yes, explain why:

Pepco Holdings is in agreement with the comments submitted by EEI. For the reasons stated in the EEI comments, consideration should be given to rescinding or dismissing this CAN.

**COMMENTS OF THE NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION ON
PROPOSED COMPLIANCE APPLICATION NOTICE – 0031 (CIP-006)
October 19, 2011**

The National Rural Electric Cooperative Association (NRECA) appreciates the opportunity to provide comments on NERC's proposed Compliance Application Notice (CAN) – 0031, which is focused on CIP-006. NRECA's comments are specified below.

- NRECA requests that NERC cease issuing any further CANs for industry comment until all current draft CANs are finalized. The extreme volume and pace of CANs out for industry comment is exceeding the capacity of industry to properly review them. Without the needed review by industry subject matter experts, CANs may be improperly issued and finalized based on inadequate review.
- In order to clearly understand what reliability standard requirement a CAN applies to, NERC should specify the standard, the requirement and the version number in the final CAN. Without the version number, it will be difficult to understand when a CAN should expire due to the revision of that standard through the standard development process.
- Each CAN should specify the requestor of a CAN by identifying, at minimum, the type of entity and the sector it represents.
- NERC cannot specify the maximum acceptable opening in a Physical Security Perimeter in CIP-006 without first gaining approval of the industry, the NERC BOT and FERC as required in the NERC Standards Development Process.
- While the 96 square inch measurement specified in the draft CAN might be reasonable, it is not specified in the current CIP-006, and therefore, cannot be enforced by Compliance Enforcement Authorities.
- The NERC Standards Development Process specifies how to change a standard and a CAN does not satisfy that process.
- Because the 96 square inch measurement specified in the draft CAN is not currently in CIP-006, it can only be considered one of a number of options a registered entity may use to comply with the requirements in CIP-006.
- NERC should make every effort to keep CANs as short and simple as possible and avoid repetition to ensure stakeholders can quickly and easily understand the issue(s) being addressed.

Barry R. Lawson
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MidAmerican Energy Company Comments on NERC Compliance Application Notice (CAN) CAN-0031

MidAmerican Energy Company appreciates the opportunity to provide comments for **Draft CAN-0031** (CIP-006 R1 Acceptable Opening Dimensions) posted on Sept. 23, 2011.

MidAmerican supports the comments submitted by the Edison Electric Institute (EEI). Many of the points outlined in EEI's comments are reflective of MidAmerican's position.

In general, the draft compliance application notice is going beyond the scope of the CAN process and is creating a defined term for "access point" outside of the standards process. The NERC Rules of Procedure Appendix 3A, page 23 states: "Any proposal for a new or revised definition shall be processed in the same manner as a standard."

MidAmerican Energy also has the following specific concerns with CAN-0031:

- The term "permanently installed" should be replaced with the concept that "barriers should be fastened in such a way that it cannot be defeated from outside of the physical security perimeter." There may be situations where a barrier cannot be permanently installed due to safety considerations, such as an emergency exit door that is securely fastened from inside the PSP and cannot be opened from outside the PSP.
 - The material for barriers should not be restricted to metal.
 - The compliance application notice should provide for a reasonable implementation timeline, not an effective date upon final posting.
-

CAN Comment Form

CAN Number 0031

Please complete the CAN Comment Form and email it to cancomments@nerc.net.

Commenter Information

Name: Joseph DePoorter

Phone Number: 608-252-1581

Email Address: jdepoorter@mge.com

Entity (ies) Represented: MRO NSRF consisting of: Madison Gas and Electric Company, Alliant Energy, Western Area Power Administration, Great River Energy, Xcel Energy, Rochester Public Utilities, Basin Electric Power Cooperative, Lincoln Electric System, American transmission Company, Wisconsin Public Service, Omaha Public Power District, Minnkota Power Cooperative, Midwest ISO, Otter Tail Power Company, Muscatine Power and Water, Nebraska Public Power District

Region(s): MRO

Primary Interest Groups

Do you disagree with the groups mentioned? **No**
If yes, explain why:

Issue

Do you disagree with the issue statement of the CAN? **No**
If yes, explain why:

The MRO NSRF is recommending that this CAN be deleted and the Guidance is captured as a Best Practice, White Paper etc.

Background

Do you disagree with the background statement of the CAN? **No**
If yes, explain why:

Compliance Application

Do you disagree with the compliance application section of the CAN? **Yes**

If yes, explain why:

Please note that the NERC Standard does not allow an opening in your PSP and caution that this “guidance” is favorable but should be vetted with our industry and be incorporated into the actual Standard.

The NSRF recommends that the information contained within this CAN be developed into a White Paper or other type of Guidance document and posted as a best practice.

The MRO NSRF agrees with CAN-0031 that CEAs are to consider 96 square inches as the measurement for each maximum acceptable opening without physical protective measures in place. This is consistent with other agencies that use similar measurement practices in other industries. The examples given within CAN-0031 clearly describe several examples on how an entity can apply the guidance within CAN-0031. However, the examples only speak of a square or rectangle openings. The NSRF recommends that a circle (and oval) be given within the example section to assist entities in determining the area of an opening. There may be round openings that an entity has that are within the “six-wall” border. Recommend the following be stated in this CAN;

1. That a circle example is given to read, “The area of a circle is determined by multiplying 3.14 (Pi) times the Radius, squared. So, a 10” round heating duct would be, $5 \times 5 \times 3.14 = 78.5$ sq. inches, no barrier would be required.
2. The guidance within this CAN could be used as a basis if the applicable entity has not already determined their own maximum allowable opening in the PSP and the basis of that maximum allowable opening.

The references given within CAN are not aligned, one speaks of half inch bars and the other speaks of five eights bars. One reference speaks of 100 square inches, and others speak of 96 square inches.

The following statement within CAN-0031 should be rewritten to remove the words “in length”:

Additionally, for any opening greater than 96 square inches with one side greater than 6 inches ~~in~~ length, CEAs are to look for evidence that the opening is protected against entry by the use of bars, wire mesh or other permanently installed metal barrier that leaves no opening greater than 6 inches on its shortest side.

Effective Period for CAN

Do you disagree with the effective period of the CAN? **No**

If yes, explain why:

Entities should be given an implementation date in order to assess their “six wall” border. Entities are not able to “flick a switch” and be compliant with this or any other CAN.

Evidence of Compliance

Do you disagree with the evidence of compliance mentioned in the CAN? **No**

If yes, explain why:

The MRO NSRF is recommending that this CAN be deleted and the Guidance is captured as a Best Practice, White Paper etc.



**COMMENTS OF KANSAS CITY POWER & LIGHT COMPANY ON
CAN-0031: CIP-006 R1 Acceptable Opening Dimensions**

Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company, both subsidiaries of Great Plains Energy Incorporated (collectively, "KCP&L" or the "Company"), respectfully submit these comments in response to the Proposed Changes to the NERC Compliance Application Notice ("CAN") - 0031 posted September 23, 2011 by the North American Electric Reliability Corporation ("NERC"). Consideration of these comments is appreciated.

There is no established basis for the metal materials as specified in the CAN-0031. There may be other materials that would be just as effective in providing a strong barrier and be more cost effective in implementing. Direction that has been provided may be no better than a Registered Entity's own procedures and should not be introduced by the CAN. In addition, there may be safety considerations in the security of the Physical Security Perimeter (PSP) for the employees of the Registered Entity. Directives intended to provide a one size fits all answer for unprotected openings of the PSP may introduce other risks. We recommend NERC consider these items and utilize the CAN process to provide compliance guidance, not to issue formal interpretations on standards and requirements.

Below are FMPA's final comments for this CAN:

This CAN significantly overreaches the standard and overreaches the purpose of the CANs. The CAN rules out other valid interpretations for "physical access point", such as 100 square inches, 144 square inches, or any other valid interpretation. Nowhere in the NERC standards is 96 square inches mentioned. It is inappropriate for Compliance Staff to essentially write the rules by establishing an arbitrary metric that do not exist in the standards through a CAN. Doing so significantly overreaches the purpose of the CAN and is out of alignment with the stakeholder process mandated by the FPA Section 215. At most, the CAN could require entities to describe their definition of a "physical access point".

If NERC compliance perceives the ambiguity or inconsistency of interpretation of "physical access point" as a reliability gap, then, a SAR should be requested. CANs should not be used as an "end-run" around the standards development process. This CAN seems more of a "gotcha" by instructing auditors to find possible violations based on the 96 square inch metric as opposed to working collaboratively with industry. 96 square inches may be good business practice, but how is an entity to know that the rules are 96 square inches without it being written in the standard? As such, FMPA recommends withdrawing the CAN, issuing the 96 square inches as a "best practice" possibly through a NERC Alert, and initiating a SAR request to define the term "physical access point". It is inappropriate create such a metric and impose it on the industry without industry input and consent through a comment period and balloting process.

Frank Gaffney
Florida Municipal Power Agency

CAN-0031 Issue:

1. CAN is beyond the letter of the Standard. Reasoning is sound but this needs to be addressed as an interpretation or the Standard should be incorporated into the CIP version 5 Standards revisions. While the reasoning is sound, a departure from the Standard that actually loosens the requirements of a Standard should go through the full approval process & be approved by the NERC BOT & FERC.
2. Additionally, the CAN requires the use of physical boundaries while a FER approved Interpretation located in Appendix 1 of CIP-006-3c approved the use of physical or logical controls when a six-wall perimeter cannot be established.

Federal Regulatory Affairs

**EEI Comments on
CAN-0009, CAN-0017, CAN-0029,
CAN-0031 and CAN-0039
October 14, 2011**

On behalf of our member companies, the Edison Electric Institute (EEI) appreciates the opportunity to provide the following comments on proposed Compliance Application Notices (CANs) 0009, 0017, 0029, 0031 and 0039.

General Comments

EEI urges NERC to consider suspending any further issuances of revised CANs until stakeholder concerns are addressed in the most recent batch of proposed revised CANs (i.e., CAN-0005, 0006, 0007, 0008, 0016 and 0018). At the present time, stakeholders continue to question the value and usefulness of the CAN process. We believe NERC should address those concerns by demonstrating that the process and its products are improving. As of today, NERC has not yet provided final revised CANs that were posted for comment after the Board of Trustees meeting in Vancouver, and has not posted a final CAN process document. We expect to include additional comments and recommendations in our policy input to the Board of Trustees in advance of next month's meetings in Atlanta.

We continue to have five general concerns. First, NERC continues to propose CANs that are, in fact, interpretations of approved Reliability Standard Requirements. NERC expressly states that CANs do not and should not establish new requirements under the FERC-approved Reliability Standards, and EEI urges NERC to hold to this basic policy principle.

Second, EEI believes that NERC needs to incorporate a reasonable implementation period for all CANs. Generally, we have observed that CANs routinely apply either retroactive enforcement or enforcement from the point of "Final Posting". In both cases, entities are not afforded any ability to adjust their programs, policies, systems or hardware to conform to these newly defined or clarified requirements. This approach, if left unchanged, will ensure that many, if not most, registered entities will be continually self reporting their potential non-compliance as a result of CANs. This situation is concerning and troubling particularly at a time when NERC is pursuing Find, Fix and Track.

Third, EEI believes that NERC should exercise more discernment when evaluating stakeholder questions as well as when it is necessary to provide compliance direction. At times, we have found the questions and issues identified in CANs lack merit. For example, CAN-0017 was the result of a question which asked: Does "and" actually mean "and" or could it mean "or" or possibly both? Examples such as this diminish the credibility of the CANs process and raise the question, should NERC attach the original question to all issued CANs? This approach might help the Industry better understand the context of the original question as well as improve our ability to provide poignant comments.

Fourth, we continue to believe that the CANs process would be better served by holding firm to the premise that CANs should be clear, concise and to the point; focused solely on clarifying the issue raised and strictly avoiding areas where no compliance concerns have been identified or raised. Unfortunately, the recent batch of proposed CANs contain extremely difficult to understand language and reasoning. We again urge caution that veering into areas where no question was asked frequently and inappropriately results in unintentional interpretations.

Finally, EEI notes that in this new batch of proposed CANs NERC did not consistently identify the Reliability Standard version for which the CAN was written and on occasion did not include the specific requirement in question. We believe omissions of this type, over time; will result in CANs that exist but simply do not match the version of the standard for which they were originally written as well as diminish focus on the requirement that is in question. Our following comments on specific proposed revised CANs reflect these general concerns.

Specific Compliance Application Notice Comments

CAN-0009

Reliability Standard Referenced:

FAC-008 & FAC-009 (*Version not stipulated*)

Reliability Standard Title(s):

Facility Ratings Methodology
Establish and Communicate Facility Ratings

Requirement(s) Identified:

(008) R1 & Sub-requirements R1.3.x (*Implied not specifically stated*)
(009) R1 & R2 (*Implied not specifically stated*)

NERC Identified Issue:

Should CEAs find a violation of FAC-008 R1 or FAC-009 when it is determined that constructed Facilities do not match design specifications?

Proposed Effective Date: January 7, 2011

EEI Comments: EEI submits that the premise for this CAN, which is that entities must validate “constructed” field conditions against design specifications, is incorrect and unfounded. As can be seen below, FAC-008-1 Requirement R1 does not specifically obligate an entity to include a process for comparing actual field conditions (i.e., “constructed” facilities) against original design specifications.

FAC-008-1:

R1. The Transmission Owner and Generator Owner shall each document its current methodology used for developing Facility Ratings (Facility Ratings Methodology) of its solely and jointly owned Facilities. The methodology shall include all of the following:

R1.1. A statement that a Facility Rating shall equal the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

- R1.2.** The method by which the Rating (of major BES equipment that comprises a Facility) is determined.
 - R1.2.1.** The scope of equipment addressed shall include, but not be limited to, generators, transmission conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices.
 - R1.2.2.** The scope of Ratings addressed shall include, as a minimum, both Normal and Emergency Ratings.
- R1.3.** Consideration of the following:
 - R1.3.1.** Ratings provided by equipment manufacturers.
 - R1.3.2.** Design criteria (e.g., including applicable references to industry Rating practices such as manufacturer's warranty, IEEE, ANSI or other standards).
 - R1.3.3.** Ambient conditions.
 - R1.3.4.** Operating limitations.
 - R1.3.5.** Other assumptions.

Similarly, entities are required under FAC-009-1 to establish Facility Ratings for their Facilities (existing, new & modified) consistent with their Facility Rating Methodology (FRM) as defined in FAC-008-1.

FAC-009-1:

- R1.** The Transmission Owner and Generator Owner shall each establish Facility Ratings for its solely and jointly owned Facilities that are consistent with the associated Facility Ratings Methodology.
- R2.** The Transmission Owner and Generator Owner shall each provide Facility Ratings for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities to its associated Reliability Coordinator(s), Planning Authority(ies), Transmission Planner(s), and Transmission Operator(s) as scheduled by such requesting entities.

Nowhere in either Standard does it state an entity must conduct field audits of field conditions and then assess whether existing field conditions compromise or change published Facility Ratings. Therefore, EEI respectfully suggests that a violation of any kind or any sort would be unenforceable since no Reliability Standard Requirement was violated. EEI further notes that penalizing entities that fall under Option 1, as indicated in the CAN, would incorrectly penalize entities who have included appropriate reliability measures in favor of those who were less specific. Furthermore, the simple identification of clearances as criterion in their FRM or even the validation of those clearances at the time of the original installation would not constitute a violation of the requirements of either standard or the entity's FRM unless the entity's FRM criteria also specifically required periodic inspections to validate those clearances over time and even in those situations, not all changes can be reasonably controlled over time.

As a result, EEI once again feels compelled to reinforce that NERC, within the CANs process, must not create new Requirements outside the processes provided within the NERC Rules of

Procedure. Moreover, the situation is being addressed by NERC through two NERC Alerts, "Recommendations to the Industry" dated October 7, 2010 and updated on November 20, 2010. Therefore, we see no benefit to reliability through a punitive process that we believe is unenforceable. We also note that NERC, through the above mentioned Alerts, has already set a schedule for assessing facility conditions by priority. Those schedules through urgent Industry attention are being effectively addressed while issues, as they are uncovered, are being resolved. Consequently, EEI respectfully submit that this CAN should be rescinded or dismissed in its entirety.

CAN-0017

Reliability Standard Referenced:

CIP-007 (*Version not stipulated*)

Reliability Standard Title(s):

Cyber Security - Systems Security Management

Requirement(s) Identified:

R5 (Account Management)

NERC Identified Issue:

Is a CEA to verify that technical controls, procedural controls, **or both** are implemented in assessing compliance with CIP-007 Requirement (R) 5?

Proposed Effective Date: Upon Posting as Final

EEI Comments: EEI affirms that the validity of this CAN is questionable because of the nature of the question, which if simplified and paraphrased asks: Does "and" actually mean "and" or could it mean "or" or possibly both?

Requirement R5 of the Standard states:

Account Management — The Responsible Entity shall establish, implement, and document technical **and** (emphasis added) procedural controls that enforce access authentication of, and accountability for, all user activity, and that minimize the risk of unauthorized system access.

We believe there is no question or lack of clarity as to whether both technical and procedural controls are necessary due to the use of the conjunction "and"; therefore, we see no need for compliance clarification for requirement R5. EEI submits that the Industry should stand on the plain words contained in the Standard measuring compliance in line with the requirement and associated sub-requirements as written. Consequently, EEI see no basis for this CAN and respectfully suggests that NERC consider rescinding or dismissing this CAN.

EEI is similarly troubled by NERC's attempt to arbitrarily enforce many of the subrequirements of R5 making unsupported interpretations even though EEI believes the language has been clearly written. As an example, we note NERC compliance direction as provided for Requirements R5, R5.1 and R5.2 which states:

"NERC and the Regional Entities have determined that the "and" in R5 indicates that both technical and procedural controls are required throughout the sub-requirements

R5.1 and R5.2, but both are not required for each of the actions required by R5.1 and R5.2.”

Although NERC goes on to provide some clarification to the above logic stating that, “whenever a registered entity has a technical control, the technical control has been programmed to perform pursuant to a procedure”. EEI submits that if that were the case, the entity would have met the requirement through their application of both technical and procedural controls; however, we respectfully disagree that this would always and indisputably be the case.

EEI is equally troubled by the compliance direction provided for Requirement R5.3 where CEAs are instructed to evaluate compliance based on equipment or system capability rather than the plain language of the Standard. NERC Rules of Procedure, Appendix 4D, Section 1.3 clearly allow Technical Feasibility Exceptions to be written for CIP-007-3, Requirements, R5.3, R5.3.1, R5.3.2 and R5.3.3. Therefore, we respectfully submit that the plain language of the Requirement is clear and adequate provisions have been made within the Standard enabling entities to conform to those requirements as written and as “Technically Feasible”.

Finally, EEI has concerns over some of the evidence which has been identified as necessary for compliance under the Section titled “Providing Evidence of Compliance” Password Control, Requirement R5. Specifically, we are concerned with the following:

1. Training – Compliance direction stating that CEAs are to evaluate an entity’s “training program to educate its affected personnel on its procedural solution as required by CIP-004” is an incorrect application of the requirement. Requirement R5.1.3 States:

“The Responsible Entity shall review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003-3 Requirement R5 and Standard CIP-004-3 Requirement R4.”

CIP-003-3, Requirement R5 provides Access Control direction while CIP-004-3, Requirement R4 apply’s to personnel “Access”. Again, the plain language of the standards and associated requirements as identified above simply do not specify training. Hence, training of the type and as identified is not required and should be stricken from the CAN.

2. Attestation – EEI respectfully submits that the requirement that an entity must supply an attestation from personnel responsible for implementing and/or complying with the procedural solution is unsupported in the referenced requirement or any of the other Reliability Standard requirements referenced within this Standard Requirement (i.e., CIP-003-3, Requirement R5 and CIP-004-3 Requirement R4). Therefore, we respectfully ask that NERC provide enforcement direction in conformance with the plain language of the standard and strike this requirement from the CAN.

CAN-0029

Reliability Standard Referenced:

PRC-004 (*Version not stipulated*)

Reliability Standard Title(s):

Analysis and Mitigation of Transmission and Generation Protection System Misoperations

Requirement(s) Identified:

R1, R2 and R3

NERC Identified Issue:

Does development of the common reporting template implemented by Electric Reliability Organization (ERO) - Reliability Assessment and Performance Analysis (RAPA) in 2011 modify the way in which compliance with PRC-004 will be measured?

Proposed Effective Date: January 7, 2011

EI Comments: EEI commends NERC’s clear and concise answer to the issue identified in this CAN. Note the following:

“The revised Misoperation reporting guidelines, implemented by ERO-RAPA in 2011, do not modify or negate the requirements under PRC-004.”

EEI further notes that the CAN goes on to provide additional and appropriate compliance guidance clarifying how to achieve compliance within Regions where the RRO has adopted the ERO-RAPA guidelines. No attempt was made to address issues or questions beyond what was asked. No attempt was made to provide interpretations to the Reliability Standard Requirements. Only useful information such as the hyperlink to the RAPA Misoperation Reporting Guidelines was provided.

Although it is our opinion the Version of the Standard should have also been included in the title of the CAN, we find the approach used in CAN-0029 to be in-line with our vision for CANs.

CAN-0031

Reliability Standard Referenced:

CIP-006 (*Version not stipulated*)

Reliability Standard Title(s):

Cyber Security - Physical Security of Critical Cyber Assets

Requirement(s) Identified:

R1.1

NERC Identified Issue:

What is the acceptable unprotected opening dimension in the Physical Security Perimeter (PSP)?

Proposed Effective Date: Upon posting as Final

EI Comments: EEI submits that CIP-006-3 does not provide specific direction to the Industry defining what would constitute an “acceptable unprotected opening dimension in a Physical Security Perimeter (PSP)”. Consequently, we believe that any direction provided outside of Appendix 3a of the Rules of Procedure (i.e., the Standards Process Manual, including the

Process for Developing a Term and/or the Process for Developing an Interpretation), would be arbitrary and unsupported by anything directly written or reasonably implied in the Standard. Therefore, EEI respectfully submits that any direction provided would be no better than an entity's own internal procedures and policies and should not be provided.

EEI suggests that NERC adhere to Rules of Procedures which contain clearly defined processes for asking and developing interpretations, new glossary terms, etc.; which might be necessary to ensure consistent adherence to Reliability Standard Requirements. EEI supports those processes and submits that NERC should direct entities, who have submitted questions of this type, to resubmit their question in conformance with those processes. We believe the CAN process should only be used to provide specific and directed compliance direction, not interpretations. Following this approach will ensure that approved processes are followed, the Industry is afforded the opportunity to weigh in on the interpretations and a suitable transition period is afforded.

CAN-0039

Reliability Standard Referenced:

EOP-004-1

Reliability Standard Title(s):

Disturbance Reporting

Requirement(s) Identified:

R3 (*Reliability Requirement Implied but not stated*)

NERC Identified Issue:

Does the Department of Energy's (DOE) new online process affect the EOP-004 requirement for a registered entity to submit the OE-417 disturbance report to NERC?

Proposed Effective Date: Upon posting as Final

EEI Comments: EEI finds CAN-0039 appropriate and acceptable as written as well as consistent with the original intent of the Standard. EEI also commends NERC in their efforts to make this CAN technically accurate, informationally sound and in line with the vision of CANs. Our only recommendation would be to specifically identify the Requirement for which they are basing their compliance guidance.

Dominion Comments

PROJECT TITLE: Draft CAN-0031: CIP-006 R1 Acceptable Opening Dimensions - As posted on 9/23/2011

Issue: What is the acceptable unprotected opening dimension in the Physical Security Perimeter (PSP)?

For the purpose of aiding a CEA, this CAN provides instruction to assess whether an opening in the PSP must have additional protective measures in place. What constitutes revocation of access to CCAs under different entity-specific scenarios?

Comments are due by October 14, 2011 and must be submitted electronically to cancomments@nerc.net. Please include the CAN identification name in the subject of the e-mail. NERC will issue final CANs after review and consideration of the comments.

CAN-0031	<p>CIP-006 R1 Acceptable Opening Dimensions (Redline)</p> <p>Comments are due by October 14, 2011 and must be submitted electronically to cancomments@nerc.net. Please include the CAN identification name in the subject of the e-mail. NERC will issue final CANs after review and consideration of the comments.</p>	09.23.2011	pdf
CAN-0031	<p>CIP-006 R1 Acceptable Opening Dimensions (Clean)</p> <p>Comments are due by October 14, 2011 and must be submitted electronically to cancomments@nerc.net. Please include the CAN identification name in the subject of the e-mail. NERC will issue final CANs after review and consideration of the comments.</p>	09.23.2011	pdf

Information Technology Risk Management Comments for Dominion :

Dominion has reviewed draft CAN-0031 as posted on 9/23/2011 and has reviewed EEI’s comments on the same. While Dominion has similar observations to those expressed by EEI on this CAN, Dominion is providing substantive comments based upon our understanding of the intent of the standard. With this focus, Dominion agrees in general that an opening greater than 96 square inches (with a shorter side greater than 6 inches) needs to be protected; however, as worded, CAN-0031 lacks consistency and accuracy.

Proposed clarifications to CAN-0031:

- Dominion suggests **changing the below statement...**“CEAs are to consider 96 square inches as the measurement for each maximum acceptable opening without physical protective measures in place.”
To read...“ CEAs are to consider 96 square inches as the measurement for each maximum acceptable opening without physical protective measures in place for openings with its shortest side greater than 6 inches in length.”
- Dominions suggests **changing the below statement...**“Additionally, for any opening greater than 96 square inches with one side greater than 6 inches in length, CEAs are to look for evidence that the opening is protected against entry by the use of bars, wire mesh or other permanently installed metal barrier that leaves no opening greater than 6 inches on its shortest side.”
To read...“ Additionally, for any opening greater than 96 square inches with its shortest side greater than 6 inches in length, CEAs are to look for evidence that the opening is protected against entry by the use of bars,

wire mesh or other permanently installed metal barrier that leaves no opening greater than 6 inches on its shortest side.”

- Dominion suggests **changing the below statement...**” In addition, a CEA is to verify that a responsible entity submitted a TFE for CIP-006 R1.1 that outlines the basis and alternate and/or compensating measures for any opening over 96 square inches without physical protective measures. For example, a motion detector is a non-physical protective measure.”

To read...” In addition, a CEA is to verify that a responsible entity submitted a TFE for CIP-006 R1.1 that outlines the basis and alternate and/or compensating measures for any opening over 96 square inches with its shortest side greater than 6 inches in length without physical protective measures. For example, a motion detector is a non-physical protective measure.”

**REQUEST FOR PERMISSION TO SUBMIT COMMENTS OUT-OF-TIME AND
COMMENTS OF ASSOCIATED ELECTRIC COOPERATIVE, INC.,
BASIN ELECTRIC POWER COOPERATIVE, INC., AND
TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.
ON DRAFT COMPLIANCE APPLICATION NOTICE CAN-0031**

Associated Electric Cooperative, Inc., Basin Electric Power Cooperative, Inc., and Tri-State Generation and Transmission Association, Inc. (collectively, the “G&T Cooperatives”) hereby request permission to submit their comments on the North American Electric Reliability Corporation’s (“NERC”) draft CAN-0031 six days after the October 14, 2011 comment deadline. The G&T Cooperatives submit that good cause exists to consider their comments since they are being submitted shortly after the deadline, and therefore should not disrupt NERC’s consideration of industry comments on the CAN.

The G&T Cooperatives respectfully submit that NERC should not utilize CAN-0031 to implement requirements that are not contained in CIP-006 R.1. Instead, NERC should modify the CAN to provide that the criteria for maximum acceptable opening sizes are guidelines that CEAs should consider, and that Registered Entities may demonstrate compliance with CIP-006 R1 without meeting the criteria contained in the CAN.

I. NERC SHOULD REVISE DRAFT CAN-0031 TO ENSURE THAT IT DOES NOT IMPROPERLY ESTABLISH NEW REQUIREMENTS.

A. NERC CANNOT ESTABLISH NEW RELIABILITY REQUIREMENTS THROUGH CANS.

NERC can establish reliability requirements only through the issuance of reliability standards. FPA Section 215 requires that “The Electric Reliability Organization shall file each reliability standard or modification to a reliability standard that it proposes to be made effective

under this section with the Commission.”¹ Pursuant to FPA Section 215, NERC is required to follow the Standards Development process and obtain FERC approval prior to enacting new Reliability Standards or modifying existing Reliability Standards.

NERC cannot implement new standards through the issuance of CANs. Consistent with FPA Section 215, NERC notes in each CAN that “The document is designed to convey compliance guidance from NERC’s various activities. It is not intended to establish new requirements under NERC’s Reliability Standards or modify the requirements in any existing NERC Reliability Standard.” NERC also states that CANs are to assist NERC’s Compliance Operations, Regional Entities and Registered Entities with compliance by providing consistency and transparency.²

B. NERC SHOULD MODIFY DRAFT CAN-0031 TO ENSURE THAT IT DOES NOT IMPROPERLY EXPAND THE REQUIREMENTS OF RELIABILITY STANDARD CIP-006-3C R1.

CIP-006-3c R1 does not contain criteria that establish the maximum acceptable opening sizes within a 6-wall border. It provides that “All Cyber Assets within an Electronic Security Perimeter shall reside within an identified Physical Security Perimeter. Where a completely enclosed (‘six-wall’) border cannot be established, the Responsible Entity shall deploy and document alternative measures to control physical access to such Cyber Assets.”

Draft CAN-0031 contravenes NERC’s own standards for the content of CANs because it contains explicit criteria for what constitutes a maximum acceptable opening size in an enclosed six-wall border. It provides that “CEAs are to consider 96 square inches as the measurement for

¹ 16 U.S.C. § 824o(d) (2006).

² “Compliance Application Notices,” available at <http://www.nerc.com/page.php?cid=3|22|354>.

each maximum acceptable opening without physical protective measures in place.” Draft CAN-0031 also provides that for any opening greater than 96 square inches with one side greater than 6 inches in length, CEAs should look for evidence that the opening is physically protected against entry by barriers that leave no opening greater than 6 inches on its shortest side. Neither of these requirements is contained in CIP-006-3c R1.

In addition to violating NERC's own CAN criteria, the establishment of new requirements through CAN-0031 places Registered Entities at an unreasonable risk of violation of CIP-003c R1 because they have not been given adequate time to conform to the new requirements. While the draft CAN provides that CEAs should apply the CAN with discretion with respect to enforcement actions in process and audits that have already been initiated, the CAN makes no provision for the exercise of discretion with respect to Registered Entities that are not currently involved in audits or enforcement actions, but that do not have adequate time to conform to the new requirement before initiation of an audit or a self-certification deadline. If NERC had implemented the 96 square inch requirement through the standards development process, there would be sufficient time between the adoption of the revision to the Standard and the compliance enforcement date to allow Registered Entities to comply with the new requirement.

The G&T Cooperatives understand the impetus behind the draft CAN and NERC's desire to achieve consistency and transparency in the implementation of CIP-006-3c. However, NERC is seeking to achieve its objectives in the wrong way. Rather than correct imprecise Standards through the CAN process, NERC should improve the Standards development process so that the Standards themselves contain criteria that are transparent and that can be applied consistently.

The G&T Cooperatives propose the following revisions to the draft CAN to bring it into compliance with NERC's policy that CANs should provide guidance and not establish new requirements.

1. The first two sentences after the quotation from CIP-006-3cR1 should be replaced with the following sentences: "In evaluating compliance with R1, CEAs should take into consideration the entity's definition of what is considered a maximum acceptable opening size within their Physical Security Perimeter. This opening may be defined based on a risk assessment similar to the Risk Based Assessment Methodology used for CIP-002-3."

2. The CAN also should be revised by replacing the paragraph immediately following the three bullets that explain industry measurement practices with the following sentence: "CEAs should use these industry measurement practices as guidelines in evaluating compliance by Registered Entities, but Registered Entities may provide evidence that other size criteria maintain adequate physical security."

3. The application examples should be revised to clarify that they are guidelines, rather than requirements.

II. CONCLUSION

WHEREFORE, the G&T Cooperatives respectfully request that NERC revise draft CAN-0031 as proposed in these comments.

Respectfully submitted,

BRUDER, GENTILE & MARCOUX, L.L.P.

/s/

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Counsel for Associated Electric Cooperative, Inc.,
Basin Electric Power Cooperative, Inc., and Tri-
State Generation and Transmission Association,
Inc.

October 20, 2011

CAN Comment Form

CAN Number 0031 Acceptable Opening Dimensions, CIP-005 and CIP-006

Please complete the CAN Comment Form and email it to cancomments@nerc.net.

Commenter Information

Name: Chris Higgins

Phone Number: 360-418-2132

Email Address: cmhiggins@bpa.gov

Entity (ies) Represented: Bonneville Power Administration

Region(s): WECC

Submitting on behalf of the following subject matter experts (SME's):

- Forrest Krigbaum and BPA's CIP Team

The following are BPA's comments on the Compliance Application Notice 0031

Summary of comments

After reviewing NERC's Compliance Application Notice 0031, Bonneville Power Administration feels that there are several key elements that need further clarification and if possible changed. In summary, CAN 31 has the standard disclaimer at the end that reads in part: *"It is not intended to establish new requirements under NERC's Reliability Standards or to modify the requirements in any existing NERC Reliability Standard. Compliance will continue to be assessed based on language in the currently enforceable NERC Reliability Standards."* This CAN seems to be overreaching the standard when defining "all physical access points" as "any opening greater than 96". BPA believes that the impact of this CAN will be burdensome and costly. In addition, this is clearly a requirement that goes beyond reasonable protection standards by applying a national security standard intended to protect the country's nuclear assets and national security interests. If this CAN does move forward without changes, BPA believes that there should be an implementation period to become compliant. We understand the expectation of the CAN is to ensure the best governmental security practices are implemented.

Detailed comments are below:

The North American Electric Reliability Corporation (NERC) posted Compliance Application Notice – 0031, Acceptable Opening Dimensions. CAN – 0031 states in part:

CEAs are to consider 96 square inches as the measurement for each maximum acceptable opening without physical protective measures in place. This is consistent with other agencies that use similar measurement practices in other industries.

- *Director of Central Intelligence Directive (DCID) 6/9 is the **Manual of Physical Security Standards for Sensitive Compartmented Information Facilities (SCIF)** adopted by the Department of Defense (DOD). Section 3.3.4 of this document references the 96-square-inch metric in regard to physical protection of vents, ducts and pipes.*
- *Department of Homeland Security Management Directives System MD# 11030.1 is the Manual of Physical Protection of Facilities and Real Property adopted by the Department of Homeland Security (DHS). Section VI.A.2 of this document references a 100-square-inch metric in regard to areas of single openings for perimeter walls.*
- *DOD Directive 5210.63 is the directive for Security of Nuclear Reactors and Special Nuclear Materials. In enclosure 2 of this directive, definition **E2.1.16.2** references 96 square inches as the maximum allowable opening without protective measures for Special Nuclear Material Vaults.*

The DoD and Central Intelligence Directive sources cited above are tied directly to that of National Defense and National Security interests (i.e. Nuclear Reactors and Special Nuclear Materials (SNM)). It is true that in limited instances portions of the Bulk Electric System support the Department of Defense (DOD) and other national security interests. We find the protective measure to prevent the loss, theft, diversion, and destruction of these interests is inconsistent with protecting the BES based on comparative levels of consequence. The DHS cites standards for new construction of certain government facilities and allows for a risk based application of the guidelines. The mere existence of the standards that relate to a 100 square inch opening does not translate to a requirement or recommendation for public and private utilities.

Losing control of special nuclear materials, nuclear reactors, Sensitive Compartmented Information Facilities (SCIF), and other highly sensitive national security information and material far outweigh consequences associated with other national critical infrastructure including the BES.

The exposure to nuclear material, dispersing of radiological agents, and the consequence to national security resulting from adversaries gaining access to SCIF protected information provides for consequence levels exceeding interruptions in the BES by an order of magnitude when considering the long term impacts to national security.

At no location related to the BES will SNM or SCIF protected information be present. The 96 sq in standard is not compatible with the environment and industry that the NERC CIP standards are attempting to protect. This is especially relevant when there are well defined industrial security standards available through both government guidelines and private sector guidelines. For example, DOE M. 47.4-2 Physical Protection describes options for implementing protection at "Property Protection Areas", ASIS International, and DHS all prescribe guidelines and a risk based approach to security.

Physical intrusion, through an opening, window, vent, etc of 96 square inches (the size of note book paper) is not a reasonable or credible threat to the BES. There is no information to suggest such intrusions have occurred or are anticipated to occur, other than in the speculative arena wherein CAN-0031 was developed.

It seems much more practical and reasonable to categorize these facilities as Property Protection Areas as defined in DOE M 470.4-2 or Level II or Level III Facilities as defined in the Physical Security Criteria for Federal Facilities published by the Interagency Security Committee (ISC) April 12, 2010. The current NERC Standards align with the recommendations and requirements defined in DOE M 470.4-2 and the ISC.

Additionally, CAN-0031 states:

That any opening greater than 96 square inches with one side greater than 6 inches in length, CEA's are to look for evidence that the opening is protected against entry by the use of bars, wire mesh or other permanently installed barrier that leaves no opening greater than 6 inches on its shortest side.

The intent of the 96 square inches as referenced in documents provided in CAN-0031 is to prevent the loss of special nuclear materials and information by preventing pass through, and to prevent the ability to introduce an explosive device through an opening causing a catastrophic release of nuclear material to the public. The standards above must be taken in context with the rest of the protective measures in the standard such as standards for construction of facilities, and mission of the facilities intended to be protected by the standards.

These standards were not intended for generation and transmission facilities or when protecting assets exhibiting significantly less consequence level than the release of nuclear material, nuclear explosions, or loss of this type of information.

As a visual example, the dimensions of this sheet of paper are 8.5 x 11 inches (93.5 square inches). A window or opening that is 2.5 square inches larger than this sheet of paper will require the installation of bars, wire mesh, or other permanently installed barriers.

It is definitely reasonable and prudent to implement physical **or** alternative measures to monitor and detect access through reasonable size openings. In fact, BPA has installed alternative measures (i.e. motion sensors) to monitor openings large enough that an average size human can fit through at its Critical Assets.

Should this CAN continue to proceed, BPA believes that NERC needs to strongly re-consider the language within the CAN to reflect that of CIP-006-3, R4 Physical Access Controls. NERC provides options such as Card Keys, Special Locks, Security Personnel, and Other Authentication Devices. BPA feels that CAN-0031 should reflect the same format and wording with options to apply physical protective measures or alternative measures:

Example:

The Responsible Entity shall document and implement physical or alternative measures for monitoring openings greater than XXX inches to the Physical Security Perimeter(s).

The Responsible Entity shall implement one of the following methods:

- Physical Measures: Bars, Wire Mesh
- Alternative Measures: Motion Sensors, Vibration Sensors, intrusion detection etc
- Other permanently installed metal barriers

A Technical Feasibility Exemption (TFE) should not be required to allow for the use of “alternative measures” such as motion sensors and other types of sensors to monitor openings.

Using prudent alternatives will allow utilities to apply CAN-0031 in a fiscally responsible manner and yet still provide for adequate security protection. The amount of money and resources to retrofit all of BPA’s Critical Assets with opening greater than 96sq in. such as air vents, windows, roof vents, etc would be unreasonable.

Additional detailed comments:

While the CAN is written as an advisory to Compliance Enforcement Authorities (CEA) it contains some additional instructions to Responsible Entities that have not previously been introduced. **There is one basic issue and a minor issue that must be addressed before BPA could support this CAN.**

1. The major issue is due to the CAN becoming effective with the date of its posting. This is not practical as the CAN states that Responsible Entities may need to submit Technical

Feasibility Exceptions (TFEs) for openings in the six-wall boundaries that may have previously been considered compliant. There must be adequate time to allow them to prepare and submit the TFEs, and for the Regional Entities to evaluate them. The does this by introducing a new standard of measurement, 96 square inches, to define an opening in the six wall perimeter that would require physical protection instead of permitting physical or procedural protection.

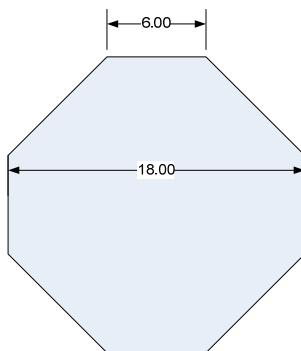
2. The second issue is, BPA feels that the CAN is unclear on the relationship between maximum total area and length of the shortest side. The examples make the intent of the CAN clear, so this is clearly an oversight. However, the examples are just that; examples, not direction.

In particular, there are two statements on page 2 of the CAN that address permissible sizes:

A) CEs are to consider 96 square inches as the measurement for each maximum acceptable opening without physical protective measures in place.

B) Additionally, for any opening greater than 96 square inches with one side greater than 6 inches in length, CEs are to look for evidence that the opening is protected against entry by the use of bars, wire mesh or other permanently installed metal barrier that leaves no opening greater than 6 inches on its shortest side.

The second statement does not address openings greater than 96 square inches whose smallest side is less than 6 inches. The second statement seems to be considering only rectangular openings. Consider the octagonal opening shown below:



Its area is 252 square inches, and its shortest side is 6 inches. Under the assumed intent of the second statement, it would need no further protection. Yet, its size clearly represents a vulnerability in the six-wall boundary.

BPA suggests the following corrections:

1. Replace the first statement on page 2

CEAs are to consider 96 square inches as the measurement for each maximum acceptable opening without physical protective measures in place with

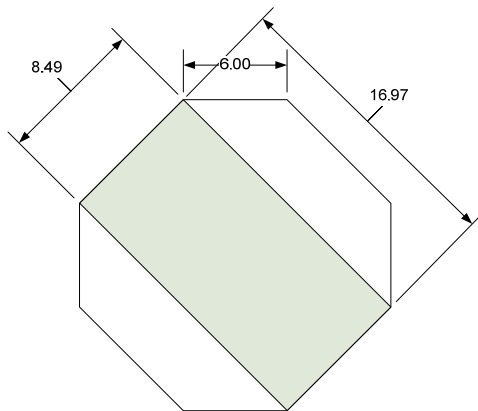
CEAs are to consider physical protective measures to be required for an opening if it is possible to enclose a 6 by 16 inch rectangle in the opening.

Note that this incorporates the 96 square inch maximum size: any opening capable of enclosing a 6 by 16 inch opening would be at least 96 square inches.

2. Delete the second statement starting “Additionally, for ...”

3. Add the following example.

The following opening has an area of 252 square inches. It can enclose a 6 by 16 inch rectangle. (In fact, it can enclose an 8.49 by 16.97 inch rectangle.) Therefore, it either needs metal bars or mesh, or the use of alternative measures and submission of a



TFE.

Finally. BPA recognizes one correction should be made on page 2, first paragraph after the 3 bullets, reads: "with one side greater than 6 inches" but this should say "with its shortest side greater than 6 inches" . It is stated correctly on page 3.

The CAN needs to state affirmatively if an opening greater than 96 square inches is allowed if the dimension of one side is not greater than 6". The CAN implies this is the case with the statement "for any opening greater than 96 square inches with one side greater than 6 inches". However, it is not stated affirmatively while the requirement that no opening greater than 96 square inches is stated affirmatively. Thus, the 6" dimension limit is implied rather than directly stated. This leaves an additional question as a result. Is there any upper limit on the opening size as long as one side is not greater than 6"?

CAN Comment Form Compliance Application Notice – 00 31

Please complete the CAN Comment Form and email it to cancomments@nerc.net. Due to the amount of comments NERC receives, we will not accept attachments or comments submitted in another format.

Commenter Information

Name: Bo Jones

Phone Number: (785) 575-1680

Email Address: Bo.Jones@westarenergy.com

Entity (ies) Represented: Westar Energy

Region(s): SPP

Primary Interest Groups

Do you disagree with the groups mentioned? Yes or No

If yes, explain why:

Issue

Do you disagree with the issue statement of the CAN? Yes or No

If yes, explain why:

Background

Do you disagree with the background statement of the CAN? Yes or No

If yes, explain why:

Compliance Application

Do you disagree with the compliance application section of the CAN? Yes or No

If yes, explain why:

Effective Period for CAN

Do you disagree with the effective period of the CAN? Yes or No

If yes, explain why:

Evidence of Compliance

Do you disagree with the evidence of compliance mentioned in the CAN? Yes or No

If yes, explain why:

CAN Comment Form Compliance Application Notice – 00 31

Please complete the CAN Comment Form and email it to cancomments@nerc.net. Due to the amount of comments NERC receives, we will not accept attachments or comments submitted in another format.

Commenter Information

Name: Michele Schelah

Phone Number: (602) 250-5178

Email Address: Michele.Schelah@aps.com

Entity (ies) Represented: AZPS

Region(s): WECC

Primary Interest Groups

Do you disagree with the groups mentioned? Yes or No

If yes, explain why:

Issue

Do you disagree with the issue statement of the CAN? Yes or No

If yes, explain why:

Background

Do you disagree with the background statement of the CAN? Yes or No

If yes, explain why:

Compliance Application

Do you disagree with the compliance application section of the CAN? Yes or No

If yes, explain why:

We have reviewed CAN-0031 for CIP-006 R1 regarding acceptable opening dimensions and believe the statement “That any opening greater than 96 square inches, with its shortest side greater than 6 inches in length, is protected against entry by the use of bars, wire mesh or other permanently installed metal barrier that leaves no opening greater than 6 inches on its shortest side.” adds additional requirements that were not in the original standard.

In addition we believe the term “protective” in the following statement “That any opening that does not have physical protective measures in place is less than 96 square inches.” would be more effective if replaced with the term “preventative”. The terminology change would help clarify a true physical prevention control versus a physical detection control (e.g. the motion sensors are detection controls – barriers are prevention controls).

Furthermore, the additional requirement for metal physical barriers would mean that AZPS would have to make physical changes to its facilities, which is costly, burdensome, and unnecessary, particularly in light of the fact that we were just audited and received no findings regarding CIP compliance.

Effective Period for CAN

Do you disagree with the effective period of the CAN? Yes or No

If yes, explain why:

Evidence of Compliance

Do you disagree with the evidence of compliance mentioned in the CAN? Yes or No

If yes, explain why:

CAN Comment Form Compliance Application Notice – 00

Please complete the CAN Comment Form and email it to cancomments@nerc.net. Due to the amount of comments NERC receives, we will not accept attachments or comments submitted in another format.

Commenter Information

Name:

Phone Number:

Email Address:

Entity (ies) Represented:

Region(s):

Primary Interest Groups

Do you disagree with the groups mentioned? Yes or No

If yes, explain why:

Issue

Do you disagree with the issue statement of the CAN? Yes or No

If yes, explain why:

Background

Do you disagree with the background statement of the CAN? Yes or No
If yes, explain why:

Compliance Application

Do you disagree with the compliance application section of the CAN? Yes or No
If yes, explain why:

Effective Period for CAN

Do you disagree with the effective period of the CAN? Yes or No
If yes, explain why:

Evidence of Compliance

Do you disagree with the evidence of compliance mentioned in the CAN? Yes or No
If yes, explain why: