

# CAN-0031 Comment Analysis Summary

## CIP-006 R1 Acceptable Opening Dimensions

CAN-0031 provides instruction for a CEA to assess whether an opening in the Physical Security Perimeter (PSP) must have additional protective measures in place. The CAN incorporates the direction provided by the NERC Board of Trustees in August of 2011.

The draft CAN was posted for industry comment on the NERC web site on September 23, 2011, and the comment period expired on October 14, 2011. NERC received approximately 17 comments from registered entities and three comments from trade associations, which are identified below. The main themes of the comments consisted of the following three categories: errata changes, scope and effective date of the CAN.

### Errata

The recommended errata change was to remove references to CIP-005 in the applicability section of the CAN, which was done. There was a change made with regard to the length of “any side greater than 6 inches” to now read “its shortest side greater than 6 inches.” Also, in the evidence of compliance section, the word “preventative” was added with a footnote to clarify that physical preventative measures are needed, not physical detection controls (also discussed below).

### Scope

There were several recommended substantive changes to the CAN in regard to scope. The commenters stated that CAN-0031 goes beyond the requirements in the standards, and Compliance Enforcement Authority (CEA) staff should not be instructed to verify evidence of 96 inches, because the standard does not articulate an exact measurement.

In response to the comments, CAN-0031 was drafted to ensure consistency among the ERO. Because the language of the standard does not state a number as an acceptable opening, the standard could be applied inconsistently. In order for Compliance Enforcement Authority (CEA) staff to assess compliance in a consistent manner, 96 square inches was determined to be appropriate, because it is consistent with other agencies, including the Department of Defense and the Department of Homeland Security.

Some commenters suggested that the CAN be further expanded to include other examples of different shapes, such as a circle or a polygon. In response, the shape of the opening is not the subject of the discussion, and calculations may need to be made in order to determine if an opening is greater than 96 square inches.

Other comments discussed the material used to enclose those openings and suggested to include other materials beside metal. In response, the language was changed from metal to “other permanently installed barrier,” and a footnote was added to clarify that true physical prevention control, rather than physical detection control (such as motion sensors), is the goal of installing these barriers.

#### Effective Date

Several commenters believe that NERC should incorporate a reasonable implementation period with adequate time to allow registered entities to prepare and submit the Technical Feasibility Exceptions (TFEs), and for the Regional Entities to evaluate them. CEAs will apply discretion in applying the compliance application for registered entities that have had an audit initiated. Entities are encouraged to assess their facilities and to submit TFEs to their applicable Regional Entity if necessary.

#### Conclusion

The analysis spreadsheet for CAN-0031 and the industry comments that were received have been posted on the NERC website in addition to this Comment Analysis Summary. NERC received feedback that the spreadsheet format did not provide sufficient information to provide industry with visibility into the effort that is put into reviewing all of the comments. In order to provide increased transparency to the comment analysis phase of the CAN process, the industry comments are being posted, and this document has been created to supplement the information contained in the spreadsheet.

NERC staff thanks industry members for the time and effort put into providing the comments and feedback for CAN-0031. If you would like further discussion on CAN-0031, please feel free to contact us at [cancomments@nerc.net](mailto:cancomments@nerc.net).

#### ***Registered Entities that submitted CAN Comments***

ACES Power Marketing

American Electric Power (AEP)

Associated Electric Cooperative, Inc., Basin Electric Power Cooperative, Inc., and Tri-State Generation and Transmission Association, Inc. (G&T Cooperatives)

Arizona Public Service (AZPS)

Bonneville Power Administration (BPA)

Dominion Resources Services, Inc.

Florida Municipal Power Agency (FMPA)

Kansas City Power and Light (KCP&L)

Madison Gas and Electric Company

MidAmerican Energy Company

PacifiCorp

Pepco Holdings, Inc.

Progress Energy (PGN)  
Southern Company  
Westar Energy  
Xcel Energy

*Trade Associations that submitted CAN Comments*

Edison Electric Institute (EEI)  
ISO/RTO Council Standards Review Committee (IRC SRC)  
National Rural Electric Cooperative Association (NRECA)