Unofficial Comment Form

Project 2016-02 Modifications to CIP Standards

Virtualization – Draft 4

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on the **CIP Virtualization suite of Standards** by **8 p.m. Eastern, Friday, September 30, 2022.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project%202016-02%20Modifications%20to%20CIP%20Standards.aspx). If you have questions, contact Senior Standards Developer, Jordan Mallory (via email) or at 404-446-2589.

## Background Information

Project 2016-02 (1) addresses the Federal Energy Regulatory Commission (Commission) directives contained in Order No. 822 and (2) considers the Version 5 Transition Advisory Group (V5TAG) issues identified in the CIP V5 Issues for Standard Drafting Team Consideration (V5TAG Transfer Document).

The V5TAG, which consisted of representatives from NERC, Regional Entities, and industry stakeholders, was formed to issue guidance regarding possible methods to achieve compliance with the CIP Version 5 standards and to support industry’s implementation activities. During the V5TAG’s activities, it identified certain issues with the CIP Reliability Standards that would be better addressed by a standard drafting team (SDT) for the CIP Reliability Standards. The V5TAG developed the [CIP Version 5 Transition Advisory Group Issues for Consideration](http://www.nerc.com/pa/Stand/Project%20201602%20Modifications%20to%20CIP%20Standards%20DL/Transfer_Issues_V5TAG-SDT_1st-final-03232016.pdf) document to formally recommend that the SDT address these issues and consider modifications to the standard language during the standards development process.

## Summary of Changes Overview

The SDT reviewed all comments and made modifications to the Reliability Standards and Definitions accordingly. There are currently two drafting teams working on modifications to CIP-003-8. The NERC Project 2016-02 SDT is posting its modifications as CIP-003-Y to differentiate its work from the Supply Chain Low drafting teams (Project 2020-03) modifications, which has posted CIP-003-X.

In addition, the proposed new and revised definitions are not balloted separately but are being balloted via the standards. As such, when voting on the standards, ballot body participants will also be voting on the proposed new and revised definitions used in those standards. The definitions are posted in one document among the other ballot materials. While CIP-002, CIP-003, CIP-004, CIP-006, CIP-008, CIP-009, CIP-011, and CIP-013 passed ballot during the draft 3 posting, the SDT will be balloting all standards again based on updated definitions.

Below are questions for which the SDT is seeking industry input. In order to allow the SDT to sort comments received by topic, the SDT respectfully requests comments be submitted with the respective question topic. The SDT thanks all stakeholders for your time and responses during this comment period.

## Questions

1. The SDT has modified the IRA definition to simplify it, primarily in regards to the routable protocol to serial conversion scenario. Do you agree with the proposed change? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT modified other definitions used in the CIP standards based on industry comments. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT revised CIP-005 based on industry comments. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT revised CIP-007 based on industry comments. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT has used phrasing such as “SCI supporting an Applicable System from this Part” in the Applicable Systems column across many of the standards. Is it clear that this scopes the requirements for SCI to match the system(s) it hosts?

[ ]  Yes

[ ]  No

Comments:

1. The SDT made numerous clarifying changes to CIP-010 based on industry comments. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT revised CIP-003, CIP-004, CIP-006, CIP-008, CIP-009, CIP-011, and CIP-013 mostly with conforming changes or scoping clarifications related to SCI. Do you agree with the proposed changes to these Reliability Standards? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT has revised the Implementation Plan to include 3 defined early adoption dates as options should Responsible Entities choose to do so. Do you agree with the proposed Implementation Plan? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. Please provide any additional comments for the standard drafting team to consider, if desired.