Unofficial Comment Form

Project 2016-02 Modifications to CIP Standards

CIP-002-6

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System](https://sbs.nerc.net/) to submit comments on **CIP-002-6 - Cyber Security – BES Cyber System Categorization (Transmission Owner Control Center performing Transmission Operator obligations)**. Comments must be submitted by **8 p.m. Eastern, Tuesday, October 9, 2018**. **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 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. Among other issues of the V5TAG recommended clarification of the phrase “used to perform the functional obligations of the Transmission Operator” in CIP-002-5.1a, Attachment 1, Criterion 2.12. The Project 2016-02 Standard Drafting Team (SDT) proposes the following modifications to CIP-002-5.1a, Attachment 1, Criterion 2.12 to clarify the applicability of requirements on a Transmission Owner Control Center that performs the functional obligations of a Transmission Operator.

The proposed criterion establishes an average MVA line loading based on voltage class, for BES Transmission Lines operated between 100 and 499 kV. The aggregate weighted value for applicable BES Cyber Systems must exceed 6000 to meet the minimum threshold established in Criterion 2.12. The aggregate weighted value is calculated by summing the "weight value per line" shown in the associated table for each BES Transmission Line monitored and controlled by the Control Center or backup Control Center. If the BES Cyber System(s) exceeds the 6000 aggregate weighted value, it should be identified as a medium impact BES Cyber System. If the BES Cyber System does not exceed the 6000 aggregate weighted value, it should be categorized as a low impact BES Cyber System pursuant to Criterion 3.1.

Reliability Standard CIP-002-5.1a (Impact Rating Criterion 2.6 in Attachment 1), however, references

IROLs identified by Planning Coordinators and Transmission Planners. The Project 2015-09 SDT

concluded that there is a need to modify CIP-002-5.1a to account for the retirement of FAC-010-3 and

the elimination of a requirement for planners to identify SOLs and IROLs. The Project 2015-09 SDT

developed draft language to replace the reference to such IROLs in Criterion 2.6 with other language

that would allow Planning Coordinators and Transmission Planners to identify Facilities that otherwise

do not meet the criteria in Section 2 of Attachment 1 but pose a higher risk to reliability such that its

BES Cyber Systems should be protected as Medium Impact. In addition, the Project 2015-09 SDT

recommends revising the IROLs reference in Impact Rating Criterion 2.9 in Attachment 1 to CIP-002-

5.1a. reference in Impact Rating Criterion 2.9 in Attachment 1 to CIP-002-5.1a.

## Questions

1. Attachment 1, Criterion 2.6: Do you agree with the proposed modifications in CIP-002-6 Attachment 1, Criterion 2.6? If not, please provide your rationale and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. Attachment 1, Criterion 2.9: Do you agree with the proposed modifications in CIP-002-6 Attachment 1, Criterion 2.9? If not, please provide your rationale and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. Attachment 1, Criterion 2.12: No changes have been added from the previous ballot. Do you agree with the proposed modifications in CIP-002-6 Attachment 1, Criterion 2.12? If not, please provide your rationale and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. Guidelines and Technical Basis: Do you agree with the proposed modifications to Criterion 2.6 of the Guidelines and Technical Basis section of the CIP-002-6 standard?

[ ]  Yes

[ ]  No

Comments:

1. Guidelines and Technical Basis: Do you agree with the proposed modifications to Criterion 2.9 of the Guidelines and Technical Basis section of the CIP-002-6 standard?

[ ]  Yes

[ ]  No

Comments:

1. Implementation Plan: The SDT proposes an Implementation Plan to make the revised standard effective the first day of the first calendar quarter that is fifteen (15) calendar months after the effective date of the applicable governmental authority’s order approving the standard, or as otherwise provided for by the applicable governmental authority. Do you agree with this proposal? If you think an alternate, shorter or longer implementation time period is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.

[ ]  Yes

[ ]  No

Comments:

1. The SDT believes proposed modifications in CIP-002-6 provide entities with flexibility to meet the reliability objectives in a cost effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments: