Unofficial Comment Form

Project 2023-06 CIP-014 Risk Assessment Refinement
Standard Authorization Request

**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 **Project 2023-06 CIP-014 Risk Assessment Refinement Standard Authorization Request (SAR)** by **8 p.m. Eastern, Thursday, August 24, 2023.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://auth.internal.nerc.com/pa/Stand/Pages/Project_2023-06_CIP-014_Risk_Assessment_Refinement.aspx). If you have questions, contact Manager of Standards Development, Jamie Calderon (via email), or at 404-446-9647.

## Background Information

Due to an increase in reports of physical attacks on electric substations, the Federal Energy Regulatory Commission (FERC) issued the December 2022 Order in Docket No. RD23-2-000 directing NERC to evaluate the effectiveness of the Physical Security Reliability Standard CIP-014-3 in mitigating the risks to the Bulk-Power System (BPS) associated with physical attacks. In the [report](https://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/NERC%20Report%20on%20CIP-014-3.pdf) filed in response to a FERC directive, NERC staff identified continuing inconsistency in registered entity CIP-014-3 risk assessments to most appropriately identify critical infrastructure. FERC directed NERC to evaluate whether the physical security protection requirements in NERC’s Reliability Standards are adequate to address the risks associated with physical attacks on BPS Facilities, including the adequacy of the required risk assessment in CIP-014-3 Requirement R1. In the [report](https://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/NERC%20Report%20on%20CIP-014-3.pdf), NERC found that CIP-014-3 required revision to assure adequate and consistent approach in evaluating instability as well as the identification of infrastructure critical to the operation of the BPS.

## Questions

1. Do you agree with the proposed scope as described in the Project 2023-06 SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

1. Provide any additional comments for the SAR drafting team to consider, if desired.

Comments: