

Comment Report

Project Name: 2023-04 Modifications to CIP-003 | Draft 3
Comment Period Start Date: 6/12/2024
Comment Period End Date: 7/11/2024
Associated Ballots: 2023-04 Modifications to CIP-003 CIP-003-A AB 3 ST
2023-04 Modifications to CIP-003 Implementation Plan AB 3 OT

There were 54 sets of responses, including comments from approximately 156 different people from approximately 92 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree with the language proposed in CIP-003-11 Attachment 1? If you do not agree, please explain why and provide recommended language you would support and, if appropriate, technical, or procedural justification.

2. Do you agree with the language proposed in CIP-003-11 Attachment 2? If you do not agree, please explain why and provide recommended language you would support and, if appropriate, technical, or procedural justification.

3. The Drafting Team (DT) proposes a three (3) year implementation plan for CIP-003-11. Do you agree with the proposed implementation plan? If you think an alternate timeframe is needed, please propose an alternate implementation plan with detailed explanation.

4. The DT believes the language of CIP-003-11 addresses the issues outlined in the SAR 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.

5. Provide any additional comments on the standard and technical rationale for the DT to consider, if desired.

The DT created a CIP-003-12 standard, CIP-003-12 implementation plan and a summary of changes document for this posting. Please review these files prior to answering this question.

6. Do you have any concerns in the way CIP-003-10 (Project 2016-02 changes) and CIP-003-11 (Project 2023-04 changes) were combined to create standard CIP-003-12?

The DT created a CIP-003-12 standard, CIP-003-12 implementation plan and a summary of changes document for this posting. Please review these files prior to answering this question.

7. Do you have any concerns in the CIP-003-12 implementation plan that should be addressed?

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
MRO	Anna Martinson	1,2,3,4,5,6	MRO	MRO Group	Shonda McCain	Omaha Public Power District (OPPD)	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jamison Cawley	Nebraska Public Power District	1,3,5	MRO
					Jay Sethi	Manitoba Hydro (MH)	1,3,5,6	MRO
					Husam Al-Hadidi	Manitoba Hydro (System Performance)	1,3,5,6	MRO
					Kimberly Bentley	Western Area Power Administration	1,6	MRO
					Jaimin Patal	Saskatchewan Power Corporation (SPC)	1	MRO
					George Brown	Pattern Operators LP	5	MRO
					Larry Heckert	Alliant Energy (ALTE)	4	MRO
					Terry Harbour	MidAmerican Energy Company (MEC)	1,3	MRO
					Dane Rogers	Oklahoma Gas and Electric (OG&E)	1,3,5,6	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Ayotte	ITC Holdings	1	MRO
					Andrew Coffelt	Board of Public Utilities-Kansas (BPU)	1,3,5,6	MRO
Peter Brown	Invenergy	5,6	MRO					

					Angela Wheat	Southwestern Power Administration	1	MRO
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
Tennessee Valley Authority	Brian Millard	1,3,5,6	SERC	TVA RBB	Ian Grant	Tennessee Valley Authority	3	SERC
					David Plumb	Tennessee Valley Authority	1	SERC
					Armando Rodriguez	Tennessee Valley Authority	6	SERC
					Nehtisha Rollis	Tennessee Valley Authority	5	SERC
Santee Cooper	Carey Salisbury	5		Santee Cooper	Rodger Blakely	Santee Cooper	1,3,5,6	SERC
					Christine Pope	Santee Cooper	1,3,5,6	SERC
					Lachelle Brooks	Santee Cooper	1,3,5,6	SERC
					Rene' Free	Santee Cooper	1,3,5,6	SERC
					Bob Rhett	Santee Cooper	1,3,5,6	SERC
					Bridget Coffman	Santee Cooper	1,3,5,6	SERC
					Wanda Williams	Santee Cooper	1,3,5,6	SERC
					Jordan Steele	Santee Cooper	1,3,5,6	SERC
WEC Energy Group, Inc.	Christine Kane	3		WEC Energy Group	Christine Kane	WEC Energy Group	3	RF
					Matthew Beilfuss	WEC Energy Group, Inc.	4	RF
					Clarice Zellmer	WEC Energy Group, Inc.	5	RF
					David Boeshaar	WEC Energy Group, Inc.	6	RF
Manitoba Hydro	Jay Sethi	1,3,5,6	MRO	Manitoba Hydro Group	Nazra Gladu	Manitoba Hydro	1	MRO

					Mike Smith	Manitoba Hydro	3	MRO
					Kristy-Lee Young	Manitoba Hydro	5	MRO
					Kelly Bertholet	Manitoba Hydro	6	MRO
Jennie Wike	Jennie Wike		WECC	Tacoma Power	Jennie Wike	Tacoma Public Utilities	1,3,4,5,6	WECC
					John Merrell	Tacoma Public Utilities (Tacoma, WA)	1	WECC
					John Nierenberg	Tacoma Public Utilities (Tacoma, WA)	3	WECC
					Hien Ho	Tacoma Public Utilities (Tacoma, WA)	4	WECC
					Terry Gifford	Tacoma Public Utilities (Tacoma, WA)	6	WECC
					Ozan Ferrin	Tacoma Public Utilities (Tacoma, WA)	5	WECC
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy-FirstEnergy	1,3,4,5,6	RF
					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF
Michael Johnson	Michael Johnson		WECC	PG&E All Segments	Marco Rios	Pacific Gas and Electric Company	1	WECC
					Sandra Ellis	Pacific Gas and Electric Company	3	WECC
					Tyler Brun	Pacific Gas and Electric Company	5	WECC

Black Hills Corporation	Rachel Schuldt	6		Black Hills Corporation - All Segments	Micah Runner	Black Hills Corporation	1	WECC
					Josh Combs	Black Hills Corporation	3	WECC
					Rachel Schuldt	Black Hills Corporation	6	WECC
					Carly Miller	Black Hills Corporation	5	WECC
					Sheila Suurmeier	Black Hills Corporation	5	WECC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power Coordinating Council	10	NPCC
					Deidre Altobell	Con Edison	1	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC
					Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
					Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC
					Randy Buswell	Vermont Electric Power Company	1	NPCC
					James Grant	NYISO	2	NPCC
					Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
					David Burke	Orange and Rockland	3	NPCC
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
					Salvatore Spagnolo	New York Power Authority	1	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC

					David Kwan	Ontario Power Generation	4	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
					Sean Cavote	PSEG	4	NPCC
					Jason Chandler	Con Edison	5	NPCC
					Tracy MacNicoll	Utility Services	5	NPCC
					Shivaz Chopra	New York Power Authority	6	NPCC
					Vijay Puran	New York State Department of Public Service	6	NPCC
					David Kiguel	Independent	7	NPCC
					Joel Charlebois	AESI	7	NPCC
					Joshua London	Eversource Energy	1	NPCC
					Nicolas Turcotte	Hydro-Quebec (HQ)	1	NPCC
					Jeffrey Streifling	NB Power Corporation	1,4,10	NPCC
					Joel Charlebois	AESI	7	NPCC
					John Hastings	National Grid	1	NPCC
					Erin Wilson	NB Power	1	NPCC
					James Grant	NYISO	2	NPCC
					Michael Couchesne	ISO-NE	2	NPCC
					Kurtis Chong	IESO	2	NPCC
					Michele Pagano	Con Edison	4	NPCC
					Bendong Sun	Bruce Power	4	NPCC
					Carvers Powers	Utility Services	5	NPCC
					Wes Yeomans	NYSRC	7	NPCC
Dominion - Dominion Resources, Inc.	Sean Bodkin	6		Dominion	Connie Lowe	Dominion - Dominion Resources, Inc.	3	NA - Not Applicable

					Lou Oberski	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable
					Larry Nash	Dominion - Dominion Virginia Power	1	NA - Not Applicable
					Rachel Snead	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable
Western Electricity Coordinating Council	Steven Rueckert	10		WECC CIP	Steve Rueckert	WECC	10	WECC
					Morgan King	WECC	10	WECC
					Deb McEndaffer	WECC	10	WECC
					Tom Williams	WECC	10	WECC
Tim Kelley	Tim Kelley		WECC	SMUD and BANC	Nicole Looney	Sacramento Municipal Utility District	3	WECC
					Charles Norton	Sacramento Municipal Utility District	6	WECC
					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Foung Mua	Sacramento Municipal Utility District	4	WECC
					Nicole Goi	Sacramento Municipal Utility District	5	WECC
					Kevin Smith	Balancing Authority of Northern California	1	WECC

1. Do you agree with the language proposed in CIP-003-11 Attachment 1? If you do not agree, please explain why and provide recommended language you would support and, if appropriate, technical, or procedural justification.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer No

Document Name

Comment

FirstEnergy finds the scope is too great for larger utilities to be successfully accomplished as well as within the timeframe suggested by these proposals.

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Although section 3.1.2 is within the scope of the SAR BPA still believes it creates a higher compliance bar for Low BCS than for Medium BCS outside of Control Centers and inconsistencies within the standards. The proposed language requires detection of known/suspected malicious communications for "inbound and outbound electronic remote access." There is no similar requirement for Medium BCS unless they are at a Control Center (see Draft 5 of CIP-005-8 R1.5).

BPA suggests that this requirement be removed for better consistency with the requirements for Medium BCS or the applicability be changed to bring it in-line with other requirements.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer No

Document Name

Comment

Section 3.1.2 is requiring malicious communication detection which is not even required at medium sites (CIP-005-7 or CIP-005-8). It does not make sense to require it at lows unless there is going to be a change to require it for mediums as well.

Section 4 and Section 5 cannot be accomplished without knowing the individual assets that are part of the low impact Cyber Systems. The note that states a list of low assets is not required is a fallback that entities are using to justify not accomplishing the requirements of section 4 and 5. The requirement to classify individual assets should be required to accomplish all the changes in requirements.

Likes 0

Dislikes 0

Response

Alison Nickells - NiSource - Northern Indiana Public Service Co. - 1 - RF

Answer No

Document Name

Comment

The additional language in Section 3 does not fully mitigate the coordinated attack risk for LIBCS as the controls do not address distributed network accessibility from IBRs. Also, the suggested Requirements are more stringent than BCS classified as Medium Impact without ERC.

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC

Answer No

Document Name

Comment

CIP-003-11 Attachment 1, Section 3, Part 3.1.2 does not specify whether the requirement is to detect known or suspected malicious communications for **both** encrypted and/or unencrypted traffic.

SMUD recommends changing the language to:

3.1.2 Detect known or suspected malicious communications for both inbound and outbound electronic **unencrypted** access;

Likes 0

Dislikes 0

Response

Jeffrey Streifling - NB Power Corporation - 1

Answer No

Document Name

Comment

We are confused with the foundation starting with CIP-003-9 which was modified based upon project 2016-02 virtualization creating CIP-003-10 which has not been approved by FERC. CIP-003-11 changes do not appear to align or clearly track the changes in the last approved CIP-003-9 language. CIP-003-12 attempts to combine CIP-003-10 and the proposed CIP-003-11 but does not seem to capture all changes. We recommend merging the proposed language in CIP-003-11 and CIP-003-12, merge the implementation plans, and repost after FERC approves CIP-003-10 in a new ballot.

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer No

Document Name

Comment

For Attachment 1, Part 3.1.2 – As proposed, this currently applies to all low impact BES Cyber Systems but does not apply to Medium Impact Facilities that are not Control Centers. The DT needs to ensure that the reliability risks of both low and medium impact facilities are appropriately and consistently applied.

Likes 0

Dislikes 0

Response

James Keele - Entergy - 3

Answer No

Document Name

Comment

Comments: Section 3.1.3 could be reworded to be less confusing. The intent appears to be requiring authentication of remote access into a LIBCS based on the verbiage “through which user-initiated electronic access applicable to Section 3.1 is subsequently permitted”. However, the Section 3.1 that is referenced may bring local access into question, as Section 3.1 includes both inbound (remote) and outbound access (local) from the LIBCS as it only mentions traffic “between a [LIBCS] and a Cyber Asset(s) outside the asset containing [LIBCS]” with no mention of traffic direction or origination

point. This could require authentication in all cases of network access where traffic is leaving the site, if users could even be 100% aware of the destination of all information generated by their session and authentication may need to be implemented for all sessions. It may be difficult to implement an outbound access solution, and would potentially bring authentication prior to connecting to a non-CIP system into scope.

The Technical Rationale section again supports the notion that the scope includes access “from a remote client outside the asset containing the LIBCS and destined for a LIBCS within the asset”. This specifically notes an origination point and a traffic direction, which is missing in the language of the requirement.

The requirement should specify traffic origination and direction for authentication if it is indeed scoped only to remote access. If local network access is intended to be included, then a requirement for remote access authentication and a separate requirement for local system access should be created and mirror the requirements of CIP-005 and CIP-007.

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

No

Document Name

Comment

OPG supports NPCC Regional Standards Committee's comments.

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez

Answer

No

Document Name

Comment

• The proposed changes to the language in section 1.1 of the “C. Compliance” area of the standard is problematic. What “Applicable Governmental Authority” could enforce compliance other than FERC, NERC or the Regional Entity in their “respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions”? How is “Applicable” defined?

• Language in section 3, particularly 3.1.1 through 3.1.6 and 3.2, is perceived to be arduous and expensive to implement and maintain compliance with, and could result in negative results. More money and people will be required to ensure compliance rather than focus on the goal, which is to

secure the systems against adversaries. Low impact assets are low impact or they are not. By adding the requirements to permit only necessary inbound and outbound access, detect known or suspected malicious communications, authenticate each user prior to permitting access, protecting user authentication information, determine vendor electronic access and disabling vendor access this is, in essence, raising the level of compliance requirements, and subsequently to the audit requirements thereof, to a state equivalent to Medium impact.

- Recommendations: Leave it alone. Unless there are metrics to prove that the existing standards are not adequately protecting the critical infrastructure relating directly to root causes identifying these sections of the standards, then modifications to them should not be made, especially modifications that would result in an undue burden to the financial stability of the Responsible entity due to additional compliance requirements, labor, capital costs and potential fines for non-compliance.
- Cancel all changes to CIP-003-9 and the SAR should be reviewed and recommendations made to change the criterion for Medium impact based on objective and measurable criteria rather than expect responsible entities to acquiesce to the recommendation by the LICRT to change all low impact requirements.

Likes 0

Dislikes 0

Response

Ellese Murphy - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF

Answer Yes

Document Name

Comment

Duke Energy supports the proposed language.

Likes 0

Dislikes 0

Response

Richard Vendetti - NextEra Energy - 5

Answer Yes

Document Name

Comment

NEE supports EEI's comments: "EEI supports the language proposed in CIP-003-11 Attachment 1."

Likes 0

Dislikes 0

Response

Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 5

Answer Yes

Document Name

Comment

Supporting EEI comments

Likes 0

Dislikes 0

Response

Matt Carden - Southern Company - Southern Company Services, Inc. - 1

Answer Yes

Document Name

Comment

Southern Company is in agreement with EEI along with the following comment:

Southern asks that a clarification as to intent be made at least in the Technical Rationale document that for 3.1.3 when it states "Authenticate each user" that it does not imply that every remote user must have an individual user account, precluding the use of shared accounts by valid and authorized users for remote access.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer Yes

Document Name

Comment

Exelon is aligned with EEI in response to this question.

Likes 0

Dislikes 0

Response

Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer Yes

Document Name

Comment

CenterPoint Energy Houston Electric, LLC (CEHE) supports the proposed language in CIP-003-11 Attachment 1.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

Exelon supports the comments submitted by the EEI for this question.

Likes 0

Dislikes 0

Response

Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name TVA RBB

Answer Yes

Document Name

Comment

TVA requests clarification that a list of users is not required to be maintained for vendor remote access.

Likes 0

Dislikes 0

Response

Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer	Yes
Document Name	
Comment	
EEI supports the language proposed in CIP-003-11 Attachment 1.	
Likes 0	
Dislikes 0	
Response	
Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	Yes
Document Name	
Comment	
The NAGF supports the proposed language in CIP-003-11 Attachment 1.	
Likes 0	
Dislikes 0	
Response	
Selene Willis - Edison International - Southern California Edison Company - 5	
Answer	Yes
Document Name	
Comment	
See comments from EEI	
Likes 0	
Dislikes 0	
Response	
Michael Moltane - International Transmission Company Holdings Corporation - 1	
Answer	Yes
Document Name	

Comment

Support EEI

Likes 0

Dislikes 0

Response

Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rebika Yitna - Rebika Yitna On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - Rebika Yitna

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO, Group Name Manitoba Hydro Group

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ijad Dewan - Hydro One Networks, Inc. - 1 - NPCC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Erik Gustafson - PNM Resources - 1,3 - WECC,Texas RE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Fausto Serratos - Los Angeles Department of Water and Power - 3****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Robert Kerrigan - Los Angeles Department of Water and Power - 5****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Marvin Johnson - DTE Energy - Detroit Edison Company - 3****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tyler Schwendiman - ReliabilityFirst - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Karen Artola - CPS Energy - 1,3,5 - Texas RE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Mike Magruder - Avista - Avista Corporation - 1****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Glen Farmer - Avista - Avista Corporation - 5****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC CIP

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Robert Follini - Avista - Avista Corporation - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer Yes

Document Name

Comment

Likes 1 Lincoln Electric System, 1, Johnson Josh

Dislikes 0

Response

TRACEY JOHNSON - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Alan Kloster

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nick Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leshel Hutchings - AEP - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carey Salisbury - Santee Cooper - 5, Group Name Santee Cooper

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer

Document Name

Comment

We are confused with the foundation starting with CIP-003-9 which was modified based upon project 2016-02 virtualization creating CIP-003-10 which has not been approved by FERC. CIP-003-11 changes do not appear to align or clearly track the changes in the last approved CIP-003-9 language. CIP-003-12 attempts to combine CIP-003-10 and the proposed CIP-003-11 but does not seem to capture all changes. We recommend merging the proposed language in CIP-003-11 and CIP-003-12, merge the implementation plans, and repost after FERC approves CIP-003-10 in a new ballot.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer

Document Name

Comment

WEC Energy Group supports the language proposed in CIP-003-11.

Likes 0

Dislikes 0

Response

2, Do you agree with the language proposed in CIP-003-11 Attachment 2? If you do not agree, please explain why and provide recommended language you would support and, if appropriate, technical, or procedural justification.

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez

Answer No

Document Name

Comment

• Suggested language changes throughout section 3 have completely vacated the approved CIP-003-8 and the changes are monumental. All changes are perceived to be arduous and expensive to implement and maintain compliance with, and could result in negative results. More money and people will be required to ensure compliance rather than focus on the goal, which is to secure the systems against adversaries. Low impact assets are low impact or they are not. By adding the requirements to show the ability to detect and authenticate, protect, determine and disable, this is, in essence, raising the level of compliance requirements, and subsequently the audit requirements thereof, to a state equivalent to a Medium impact facility.

• Cancel all changes to CIP-003-9 and the SAR should be reviewed and recommendations made to change the criterion for Medium impact based on objective and measurable criteria rather than expect responsible entities to acquiesce to the recommendation by the LICRT to change all low impact requirements.

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer No

Document Name

Comment

OPG supports NPCC Regional Standards Committee's comments.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer No

Document Name

Comment

Ameren suggests removing OEM sheets from the list of documentation. An OEM would not provide recommendations on how to use a device or consider what is necessary for electronic access by the entity.

Likes 0

Dislikes 0

Response

Jeffrey Streifling - NB Power Corporation - 1

Answer

No

Document Name

Comment

We are confused with the foundation starting with CIP-003-9 which was modified based upon project 2016-02 virtualization creating CIP-003-10 which has not been approved by FERC. CIP-003-11 changes do not appear to align or clearly track the changes in the last approved CIP-003-9 language. CIP-003-12 attempts to combine CIP-003-10 and the proposed CIP-003-11 but does not seem to capture all changes. We recommend merging the proposed language in CIP-003-11 and CIP-003-12, merge the implementation plans, and repost after FERC approves CIP-003-10 in a new ballot.

Likes 0

Dislikes 0

Response

Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nick Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh

Answer

No

Document Name

Comment

NST suggests adding username/password to the list of user authentication mechanisms cited in Section 3, Item 3 as possible ways to address requirement 3.1.3 of Attachment 1, Section 3. We believe this addition to be justified by the fact the Technical Rationale document mentions username and password in its discussion of Attachment 1, Section 3.1.4.

Likes 0

Dislikes 0

Response

Alison Nickells - NiSource - Northern Indiana Public Service Co. - 1 - RF

Answer

No

Document Name

Comment

Please refer to the comments provided in Question 1 above.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer

No

Document Name

Comment

Do not agree with 3.1.2 for Malware Detection unless it is going to be required at medium sites as well.

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

No

Document Name

Comment

Although section 3.1.2 is within the scope of the SAR BPA still believes it creates a higher compliance bar for Low BCS than for Medium BCS outside of Control Centers and inconsistencies within the standards. The proposed language requires detection of known/suspected malicious communications for "inbound and outbound electronic remote access." There is no similar requirement for Medium BCS unless they are at a Control Center (see Draft 5 of CIP-005-8 R1.5).

BPA suggests that this requirement be removed for better consistency with the requirements for Medium BCS or the applicability be changed to bring it in-line with other requirements.

BPA recommends the SDT include a documentation option outside of OEM spec sheets as, depending on equipment, these may not be available. BPA also believes internal proof of testing should be allowable in case OEM was not available.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer No

Document Name

Comment

FirstEnergy finds the scope is too great for larger utilities to be successfully accomplished as well as within the timeframe suggested by these proposals.

Likes 0

Dislikes 0

Response

Michael Moltane - International Transmission Company Holdings Corporation - 1

Answer Yes

Document Name

Comment

Support EEI

Likes 0

Dislikes 0

Response

Selene Willis - Edison International - Southern California Edison Company - 5

Answer Yes

Document Name

Comment

See comments from EEI

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer	Yes
Document Name	
Comment	
The NAGF supports the proposed language in CIP-003-11 Attachment 2.	
Likes 0	
Dislikes 0	
Response	
Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI supports the language proposed in CIP-003-11 Attachment 2 as it conforms with the revised language in Attachment 1.	
EEI provides the non-substantive edit to change the case of the terms "Intrusion Detection System (IDS)/Intrusion Prevention System (IPS)" and "Security Incident and Event Management (SIEM)" in Attachment 2, Section 3, part 2 to lowercase because they are not NERC Glossary defined terms and do not require capitalization.	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Alan Kloster On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute for Question #2.	
Likes 0	
Dislikes 0	
Response	

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

Exelon supports the comments submitted by the EEI for this question.

Likes 0

Dislikes 0

Response

Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer Yes

Document Name

Comment

CEHE tentatively supports the proposed language in CIP-003-11 Attachment 2, but would like to request further clarification on Section 3, part 1, bullet 3 in the snippet included below:

Section 3. Electronic Access Controls: Examples of evidence for Section 3 may include, but are not limited to:

1. For Section 3.1.1, documentation showing the permittance of only inbound and outbound electronic access, where electronic access meets Section 3.1, Parts (i), (ii), and (iii), that the Responsible Entity deems necessary, such as:

• Representative diagrams that illustrate control of inbound and outbound communication(s) between the low impact BES Cyber System(s) and a Cyber Asset(s) outside the asset containing low impact BES Cyber System(s);

• Lists of implemented electronic access controls (e.g., access control lists restricting IP addresses, ports, or services; implementing unidirectional gateways); or

• Original Equipment Manufacturer (OEM) specification sheets that provide rationale around necessary electronic access.

CEHE requests further clarification on the process in determining how the inclusion of OEM specification sheets would be considered sufficient evidence for Electronic Access Controls. CEHE understands that the provided example is merely a suggestion but would like to request more clarification on how this could be utilized.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3**Answer** Yes**Document Name****Comment**

Exelon is aligned with EEI in response to this question.

Likes 0

Dislikes 0

Response**Matt Carden - Southern Company - Southern Company Services, Inc. - 1****Answer** Yes**Document Name****Comment**

Southern Company is in agreement with the EEEI comments:

EEI supports the language proposed in CIP-003-11 Attachment 2 as it conforms with the revised language in Attachment 1.

EEI provides the non-substantive edit to change the case of the terms "Intrusion Detection System (IDS)/Intrusion Prevention System (IPS)" and "Security Incident and Event Management (SIEM)" in Attachment 2, Section 3, part 2 to lowercase because they are not NERC Glossary defined terms and do not require capitalization.

Likes 0

Dislikes 0

Response**Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 5****Answer** Yes**Document Name****Comment**

Supporting EEI comments

Likes 0

Dislikes 0

Response

Richard Vendetti - NextEra Energy - 5

Answer Yes

Document Name

Comment

EEI provides the non-substantive edit to change the case of the terms "Intrusion Detection System (IDS)/Intrusion Prevention System (IPS)" and "Security Incident and Event Management (SIEM)" in Attachment 2, Section 3, part 2 to lowercase because they are not NERC Glossary defined terms and do not require capitalization."

Likes 0

Dislikes 0

Response

Ellese Murphy - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF

Answer Yes

Document Name

Comment

Duke Energy supports the proposed language and supports the non-substantive revisions proposed by EEI.

Likes 0

Dislikes 0

Response

Carey Salisbury - Santee Cooper - 5, Group Name Santee Cooper

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
James Keele - Entergy - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Leshel Hutchings - AEP - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name TVA RBB

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3,

6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

TRACEY JOHNSON - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer Yes

Document Name

Comment

Likes 1

Lincoln Electric System, 1, Johnson Josh

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Robert Follini - Avista - Avista Corporation - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC CIP

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Karen Artola - CPS Energy - 1,3,5 - Texas RE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tyler Schwendiman - ReliabilityFirst - 10

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Marvin Johnson - DTE Energy - Detroit Edison Company - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Robert Kerrigan - Los Angeles Department of Water and Power - 5**Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Fausto Serratos - Los Angeles Department of Water and Power - 3****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Erik Gustafson - PNM Resources - 1,3 - WECC,Texas RE****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Richard Jackson - U.S. Bureau of Reclamation - 1****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response

Ijad Dewan - Hydro One Networks, Inc. - 1 - NPCC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO, Group Name Manitoba Hydro Group

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rebika Yitna - Rebika Yitna On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - Rebika Yitna

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	
Document Name	
Comment	
<p>We are confused with the foundation starting with CIP-003-9 which was modified based upon project 2016-02 virtualization creating CIP-003-10 which has not been approved by FERC. CIP-003-11 changes do not appear to align or clearly track the changes in the last approved CIP-003-9 language. CIP-003-12 attempts to combine CIP-003-10 and the proposed CIP-003-11 but does not seem to capture all changes. We recommend merging the proposed language in CIP-003-11 and CIP-003-12, merge the implementation plans, and repost after FERC approves CIP-003-10 in a new ballot.</p>	
Likes 0	
Dislikes 0	
Response	

3. The Drafting Team (DT) proposes a three (3) year implementation plan for CIP-003-11. Do you agree with the proposed implementation plan? If you think an alternate timeframe is needed, please propose an alternate implementation plan with detailed explanation.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer No

Document Name

Comment

FirstEnergy finds this an enormous undertaking for larger organizations/entities to meet expectations within the 3-year implementation plan. Considerations for network buildouts and firewalls as well as coordination with transmission planning and implementation must be taken into consideration. FirstEnergy requests the Drafting Team to consider a staged implementation plan to allow for planning, scheduling, budgeting, and implementing to ensure full compliance toward the scope of CIP-003 and protection of the BES. These required steps would necessitate a longer implementation that allows 18-24 months to develop an implementation plan, budget and staff for the implementation over time, and permit a number of years for staged implementations following CIP-003-09 based on reasonable criteria set by the utility which would, of course, be overseen by the RE.

Likes 0

Dislikes 0

Response

TRACEY JOHNSON - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer No

Document Name

Comment

Southern Indiana Gas and Electric d/b/a CenterPoint Energy Indiana South (SIGE) has concerns that having multiple versions of the standard and simultaneously working on modifications, is causing confusion. Without having approved versions, further proposed revisions seem a bit premature.

Likes 0

Dislikes 0

Response

Jeffrey Streifling - NB Power Corporation - 1

Answer No

Document Name

Comment

CIP-003-11 and CIP-003-12 implementation plan should be combined and repost after FERC approves CIP-003-10 in a new ballot. NPCC recommends only having one implementation timeframe and TFIST prefers 36-month timeframe.

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer

No

Document Name

Comment

Dominion Energy recommends a 5-year implementation plan with a phased approach for the implementation of devices required to achieve compliance with the IDS / IDP provisions in Part 3.1.2, The milestones and methodology for the implementation should be at the direction of the Registered Entity.

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

No

Document Name

Comment

OPG supports NPCC Regional Standards Committee's comments.

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez

Answer

No

Document Name

Comment

• By adding the requirements to show the ability to detect and authenticate, protect, determine and disable, this is, in essence, raising the level of compliance requirements, and subsequently the audit requirements thereof, to a state equivalent to a Medium impact facility.
• Cancel all changes to CIP-003-9 and the SAR should be reviewed and recommendations made to change the criterion for Medium impact based on objective and measurable criteria rather than expect responsible entities to acquiesce to the recommendation by the LICRT to change all low impact requirements.

Likes 0

Dislikes 0

Response

Carey Salisbury - Santee Cooper - 5, Group Name Santee Cooper

Answer

No

Document Name

Comment

Santee Cooper would request a five-year implementation plan for the additional security controls listed in CIP-003-11. It would take time and money to implement these controls into over 100 low impact sites. Santee Cooper is in the process of rolling out routable communication to its low impact sites and this would require us to revisit each site to implement these additional security controls.

Likes 0

Dislikes 0

Response

Ellese Murphy - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF

Answer

Yes

Document Name

Comment

Duke Energy supports EEI comments.

Likes 0

Dislikes 0

Response

Erik Gustafson - PNM Resources - 1,3 - WECC,Texas RE

Answer

Yes

Document Name

Comment

The implementation plan for CIP-003-11 includes a footnote that states:

“1 On May 9, 2024, the NERC Board of Directors approved the retirement of Reliability Standard CIP-003-9, which was scheduled to take effect on April 1, 2026, when it approved revised Reliability Standard CIP-003-10. CIP-003-10 is pending regulatory approval. This implementation plan is intended to retire whichever version of the CIP-003 Reliability Standard that is then in effect.”

With many concurrent CIP-003 version projects, it is possible that CIP-003-11 gets approved before CIP-003-10. Regardless of which version gets approved first, the wording in the footnote states that CIP-003-9 was to take effect on April 1, 2026. Is CIP-003-9 still effective April 1, 2026, or will CIP-003-10 or CIP-003-11 (or CIP-003-12) supersede the effective date of CIP-003-9?

Likes 0

Dislikes 0

Response

Richard Vendetti - NextEra Energy - 5

Answer

Yes

Document Name

Comment

NEE supports EEI's comments: "EEI supports the proposed three-year implementation plan for CIP-003-11 and appreciates the drafting team's acknowledgement that the revisions proposed in CIP-003-11 do not conflict but build upon the implementation of CIP-003-9 which has an effective date of April 1, 2026, however, we recommend removing the footnote on page 1 of the implementation plan regarding the retirement of CIP-003-9.

The effective dates and retirement dates of the different versions of CIP-003 are discussed clearly in the General Considerations section and Retirement Date Section. Including the information in a footnote has not been standard practice and the Implementation Plan is clearer without it."

Likes 0

Dislikes 0

Response

Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 5

Answer

Yes

Document Name

Comment

Supporting EEI comments

Likes 0

Dislikes 0

Response

Matt Carden - Southern Company - Southern Company Services, Inc. - 1

Answer Yes

Document Name

Comment

Southern Company is in agreement with the EEI comments:

EEI supports the proposed three-year implementation plan for CIP-003-11 and appreciates the drafting team's acknowledgement that the revisions proposed in CIP-003-11 do not conflict but build upon the implementation of CIP-003-9 which has an effective date of April 1, 2026, however, we recommend removing the footnote on page 1 of the implementation plan regarding the retirement of CIP-003-9.

The effective dates and retirement dates of the different versions of CIP-003 are discussed clearly in the General Considerations section and Retirement Date Section. Including the information in a footnote has not been standard practice and the Implementation Plan is clearer without it.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer Yes

Document Name

Comment

Exelon is aligned with EEI in response to this question.

Likes 0

Dislikes 0

Response

Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer Yes

Document Name

Comment

CEHE supports the comments as submitted by the Edison Electric Institute (EEI)

EEI Comments:

EEI supports the proposed three-year implementation plan for CIP-003-11 and appreciates the drafting team's acknowledgement that the revisions proposed in CIP-003-11 do not conflict but build upon the implementation of CIP-003-9 which has an effective date of April 1, 2026, however, we recommend removing the footnote on page 1 of the implementation plan regarding the retirement of CIP-003-9.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer

Yes

Document Name

Comment

Exelon supports the comments submitted by the EEI for this question.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments

Answer

Yes

Document Name

Comment

Black Hills Corporation agrees with EEI's comments on question 7: Black Hills Corporation is concerned about the proposed effective date for CIP-003-12. CIP-003-12 is the alignment of the Project 2023-04 changes with conforming changes from Project 2016-02 Virtualization, which is pending FERC approval. Given its pending approval, it is difficult to understand if the 24-month period would provide a shorter implementation timeframe than the 36-month period proposed for CIP-003-11. EEI supports a 36-month implementation period for the draft revisions and asks for that timeframe regardless of the version of CIP-003 approved.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Alan Kloster

Answer Yes

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute for Question #3.

Likes 0

Dislikes 0

Response

Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

EEl supports the proposed three-year implementation plan for CIP-003-11 and appreciates the drafting team's acknowledgement that the revisions proposed in CIP-003-11 do not conflict but build upon the implementation of CIP-003-9 which has an effective date of April 1, 2026, however, we recommend removing the footnote on page 1 of the implementation plan regarding the retirement of CIP-003-9.

The effective dates and retirement dates of the different versions of CIP-003 are discussed clearly in the General Considerations section and Retirement Date Section. Including the information in a footnote has not been standard practice and the Implementation Plan is clearer without it.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer Yes

Document Name

Comment

The NAGF supports the proposed three (3) year implementation plan for CIP-003-11.

Likes 0

Dislikes 0

Response

Selene Willis - Edison International - Southern California Edison Company - 5

Answer Yes

Document Name

Comment

See comments from EEI

Likes 0

Dislikes 0

Response

Michael Moltane - International Transmission Company Holdings Corporation - 1

Answer Yes

Document Name

Comment

Support EEI

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer Yes

Document Name

Comment

WEC Energy Group supports the comments of EEI.

Likes 0

Dislikes 0

Response

Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rebika Yitna - Rebika Yitna On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - Rebika Yitna	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO, Group Name Manitoba Hydro Group	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Ijad Dewan - Hydro One Networks, Inc. - 1 - NPCC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Fausto Serratos - Los Angeles Department of Water and Power - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Robert Kerrigan - Los Angeles Department of Water and Power - 5

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Marvin Johnson - DTE Energy - Detroit Edison Company - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tyler Schwendiman - ReliabilityFirst - 10

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Alison Nickells - NiSource - Northern Indiana Public Service Co. - 1 - RF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Karen Artola - CPS Energy - 1,3,5 - Texas RE

Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes	0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC CIP

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Robert Follini - Avista - Avista Corporation - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer Yes

Document Name	
Comment	
Likes 1	Lincoln Electric System, 1, Johnson Josh
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name TVA RBB	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nick Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leshel Hutchings - AEP - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

James Keele - Entergy - 3

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	
Document Name	
Comment	
CIP-003-11 and CIP-003-12 implementation plan should be combined and repost after FERC approves CIP-003-10 in a new ballot. NPCC recommends only having one implementation timeframe and TFIST prefers 36-month timeframe.	
Likes 0	
Dislikes 0	
Response	

4. The DT believes the language of CIP-003-11 addresses the issues outlined in the SAR 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.

Carey Salisbury - Santee Cooper - 5, Group Name Santee Cooper

Answer No

Document Name

Comment

Implementing CIP-003-11 would not be cost effective for Santee Cooper. We are installing routable communication at our low impact facilities. However, when developing the plans to roll out routable communication to our low impact facilities we didn't consider CIP-003-11. To comply with CIP-003-11 we would have to add additional support and incur significant cost in adding equipment or software licenses to comply.

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez

Answer No

Document Name

Comment

• Just the recommended changes to Appendix 2 make the DT claims that the language addresses the issues outlined in the SAR cost effectively objectively false. Just the technology needed to comply with the language makes that claim unreasonable, much less the cost of labor for implementation, maintenance, audit, troubleshooting and lifecycle replacement.

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer No

Document Name

Comment

Dominion Energy does not think the methods listed in the SAR are cost effective. Any methods that require installation of devices that support IDS/IDP for Low Impact within larger Registered Entities is an expensive undertaking. Other methods that can be used to comply with the standard, such as manual reviews and SIEMs also have a significant cost associated with them.

Likes 0

Dislikes 0

Response

Jeffrey Streifling - NB Power Corporation - 1

Answer

No

Document Name

Comment

We have no comments on the cost-effectiveness of CIP-003-11. We will note that the cost effectiveness of CIP-003-12 was not asked in this comment form.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

No

Document Name

Comment

GO/GOPs will need more information to adequately assess the cost effectiveness of the proposed approach.

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC

Answer

No

Document Name

Comment

SMUD views the language in CIP-003-11 as neither cost effective nor cost ineffective. If CIP-003-11 Attachment 1, Section 3, Part 3.1.2 requires the detection of suspected malicious communications that is **encrypted** [emphasis added], then the language of CIP-003-11 would not be cost effective due to the additional cost of implementing the inspection of encrypted traffic.

Likes 0

Dislikes 0

Response

Alison Nickells - NiSource - Northern Indiana Public Service Co. - 1 - RF

Answer

No

Document Name

Comment

There will be costs associated with implementing additional IDS, monitoring, equipment upgrades, and resources to both implement and maintain. It is uncertain at this time if the language will provide a cost-effective solution.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer

No

Document Name

Comment

PG&E will not comment on costs that have not been analyzed, there are too many factors that will go into this question.

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer

No

Document Name

Comment

Reclamation identifies that more information is needed to adequately assess the cost effectiveness of the proposed approach.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

No

Document Name

Comment

See FirstEnergy's comments above.

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer

No

Document Name

Comment

There will be costs associated with adding new software/technology and upgrading legacy equipment.

Likes 0

Dislikes 0

Response

Rebika Yitna - Rebika Yitna On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - Rebika Yitna

Answer

No

Document Name

Comment

It cannot be determined at this time if the language of CIP-003-11 addresses the issues in a cost effective manner.

Likes 0

Dislikes 0

Response

Ellese Murphy - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF

Answer

Yes

Document Name

Comment

Duke Energy supports the revisions and does not have any concerns regarding the cost effectiveness.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

James Keele - Entergy - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nick Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name TVA RBB

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Alan Kloster On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	Yes
Document Name	
Comment	
Likes 1	Lincoln Electric System, 1, Johnson Josh
Dislikes 0	
Response	
Andrew Smith - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Robert Follini - Avista - Avista Corporation - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC CIP

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Karen Artola - CPS Energy - 1,3,5 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Matt Carden - Southern Company - Southern Company Services, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tyler Schwendiman - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Marvin Johnson - DTE Energy - Detroit Edison Company - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Robert Kerrigan - Los Angeles Department of Water and Power - 5	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Fausto Serratos - Los Angeles Department of Water and Power - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Erik Gustafson - PNM Resources - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ijad Dewan - Hydro One Networks, Inc. - 1 - NPCC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO, Group Name Manitoba Hydro Group

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michael Moltane - International Transmission Company Holdings Corporation - 1

Answer

Document Name

Comment

No comment

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer

Document Name

Comment

Ameren has no comment on the cost effectiveness of the project.

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer

Document Name

Comment

We have no comments on the cost-effectiveness of CIP-003-11. We will note that the cost effectiveness of CIP-003-12 was not asked in this comment form.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments

Answer

Document Name

Comment

Black Hills Corporation will not comment on cost effectiveness.

Likes 0

Dislikes 0

Response

Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer

Document Name

Comment

CEHE does not comment on cost.

Likes 0

Dislikes 0

Response

Richard Vendetti - NextEra Energy - 5

Answer

Document Name

Comment

NEE does not comment on cost.

Likes 0

Dislikes 0

Response

5. Provide any additional comments on the standard and technical rationale for the DT to consider, if desired.

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Document Name

Comment

FirstEnergy thanks the DT for their work on these drafts but requests an increase in the implementation plan's timeline to ensure efficient and manageable protection of the Bulk Electric System.

Likes 0

Dislikes 0

Response

Ellese Murphy - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF

Answer

Document Name

Comment

Duke Energy supports EEI comments.

Likes 0

Dislikes 0

Response

Fausto Serratos - Los Angeles Department of Water and Power - 3**Answer****Document Name****Comment**

CIP-003-11 references “Technical Rationale for Reliability Standard CIP-003-11 – Low Impact BES Cyber Security Criteria Revisions”. We recommend the following sentences be reviewed:

- 1) On page 1 of the Technical Rationale, please note that the following is not a complete sentence: “Specifically, the degrees of risk presented by various facilities that house the low impact BES Cyber Assets and report on whether the low impact criteria should be modified.”
- 2) On page 6 of the Technical Rationale, under Section 3.1.3, says “(allowing, establishing, gaining)” after “permitting”. It is recommended that this phrase in the parentheses should just be deleted. It is unnecessary and confusing, given that these other words do not appear in the standard.

Likes 0

Dislikes 0

Response**Robert Kerrigan - Los Angeles Department of Water and Power - 5****Answer****Document Name****Comment**

Comments: CIP-003-11 references “Technical Rationale for Reliability Standard CIP-003-11 – Low Impact BES Cyber Security Criteria Revisions”. We recommend the following sentences be reviewed:

- 1) On page 1 of the Technical Rationale, please note that the following is not a complete sentence: “Specifically, the degrees of risk presented by various facilities that house the low impact BES Cyber Assets and report on whether the low impact criteria should be modified.”
- 2) On page 6 of the Technical Rationale, under Section 3.1.3, says “(allowing, establishing, gaining)” after “permitting”. It is recommended that this phrase in the parentheses should just be deleted. It is unnecessary and confusing, given that these other words do not appear in the standard.

The DT created a CIP-003-12 standard, CIP-003-12 implementation plan and a summary of changes document for this posting. Please review these files prior to answering the following questions.

Likes 0

Dislikes 0

Response**Richard Vendetti - NextEra Energy - 5**

Answer	
Document Name	
Comment	
NEE supports EEI's comments: "The DT created a CIP-003-12 standard, CIP-003-12 implementation plan and a summary of changes document for this posting. Please review these files prior to answering the following questions."	
Likes 0	
Dislikes 0	
Response	
Michael Johnson - Michael Johnson On Behalf of: Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	
Document Name	
Comment	
The rationale comments that jump host for low sites is not required, but in reality, there are limited ways to meet the requirements stated here other than using jump hosts. Since it is required in CIP 005, it should be here too.	
The DT created a CIP-003-12 standard, CIP-003-12 implementation plan and a summary of changes document for this posting. Please review these files prior to answering the following questions.	
Likes 0	
Dislikes 0	
Response	
Matt Carden - Southern Company - Southern Company Services, Inc. - 1	
Answer	
Document Name	
Comment	
Southern Company is in agreement with the EEI comments	

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer

Document Name

Comment

Exelon is aligned with EEI in response to this question.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer

Document Name

Comment

Exelon supports the comments submitted by the EEI for this question.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments

Answer

Document Name

Comment

Black Hills Corporation is concerned about having multiple CIP-003 projects and multiple virtualization projects occurring simultaneously as it is becoming difficult to maintain oversight of the changes to a degree that allows sufficient review. In addition, how is NERC ensuring that the direction of these multiple projects maintain alignment?

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC CIP

Answer

Document Name

Comment

No Comments

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer

Document Name

Comment

The DT created a CIP-003-12 standard, CIP-003-12 implementation plan and a summary of changes document for this posting. Please review these files prior to answering the following questions.

Likes 1

Lincoln Electric System, 1, Johnson Josh

Dislikes 0

Response

Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nick Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh

Answer

Document Name

Comment

NST considers it unfortunate that industry has been afforded only a single, up or down vote on two distinctly different implementation plans, one for CIP-003-11 and one for CIP-003-12. Our "Negative" vote reflects our concerns about only the "-12" implementation plan. Given the opportunity to vote on just the "-11" implementation plan, our vote would have been "Affirmative."

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer

Document Name

Comment

In the Technical Rationale the information in figure 4 should be included in the diagram for figure 1 and figure 2. Figure 4 provides confusion because it does not meet the criteria listed in 3.1.1 and 3.1.2. Recommend that the Technical Rationale clearly states for each diagram if they are depicting compliance with only an individual subsection of the requirement.

In figure 5 can the jump host now be part of an associated data center for a Control Center?

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

Document Name

Comment

The NAGF has no additional comments.

Likes 0

Dislikes 0

Response

Jeffrey Streifling - NB Power Corporation - 1

Answer

Document Name

Comment

We are confused with the foundation starting with CIP-003-9 which was modified based upon project 2016-02 virtualization creating CIP-003-10 which has not been approved by FERC. CIP-003-11 changes do not appear to align or clearly track the changes in the last approved CIP-003-9 language.

CIP-003-12 attempts to combine CIP-003-10 and the proposed CIP-003-11 but does not seem to capture all changes. We recommend merging the proposed language in CIP-003-11 and CIP-003-12, merge the implementation plans, and repost after FERC approves CIP-003-10 in a new ballot.

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer

Document Name

Comment

We are confused with the foundation starting with CIP-003-9 which was modified based upon project 2016-02 virtualization creating CIP-003-10 which has not been approved by FERC. CIP-003-11 changes do not appear to align or clearly track the changes in the last approved CIP-003-9 language. CIP-003-12 attempts to combine CIP-003-10 and the proposed CIP-003-11 but does not seem to capture all changes. We recommend merging the proposed language in CIP-003-11 and CIP-003-12, merge the implementation plans, and repost after FERC approves CIP-003-10 in a new ballot.

Likes 0

Dislikes 0

Response

Leshel Hutchings - AEP - 3

Answer

Document Name

Comment

VCA is used in the document but never defined as Virtual Cyber Asset anywhere, if an end user needs to look up acronym, it would be useful to define VCA in the Glossary of Terms.

Likes 0

Dislikes 0

Response

Selene Willis - Edison International - Southern California Edison Company - 5

Answer

Document Name

Comment

See comments from EEI

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Michael Moltane - International Transmission Company Holdings Corporation - 1

Answer

Document Name

Comment

Support EEI

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Document Name

Comment

OPG supports NPCC Regional Standards Committee's comments.

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez

Answer

Document Name

Comment

• Cancel all changes to CIP-003-9 and the SAR should be reviewed and recommendations made to change the criterion for Medium impact based on objective and measurable criteria rather than expect responsible entities to acquiesce to the recommendation by the LICRT to change all low impact requirements resulting in unreasonable technological and labor costs.

Likes 0

Dislikes 0

Response

The DT created a CIP-003-12 standard, CIP-003-12 implementation plan and a summary of changes document for this posting. Please review these files prior to answering this question.

6. Do you have any concerns in the way CIP-003-10 (Project 2016-02 changes) and CIP-003-11 (Project 2023-04 changes) were combined to create standard CIP-003-12?

David Jendras Sr - Ameren - Ameren Services - 3

Answer No

Document Name

Comment

EACMS and PCAs have previously not been applicable for Low-Impact CIP Assets. However, SCI could be introducing an opportunity for EACMS and PCA requirements. Would a centralized engineering or cyber tool suite that is only used to support Low-Impact CIP assets from outside the ESP qualify as a SCI? If so, would EACMS or PCA requirements then apply to such a system even if such protections are not required for the BCS? Ameren suggests adding a statement to the SCI definition clarifying which requirements are for low, medium, and high impact BCS or SCI.

Likes 0

Dislikes 0

Response

Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nick Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh

Answer No

Document Name

Comment

NST has no concerns about the content of proposed CIP-003-12. We do, however, have concerns about the implementation plan, as explained below.

Likes 0

Dislikes 0

Response

Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer No

Document Name

Comment

CEHE supports the comments as submitted by EEI.

EEl has reviewed the redline of CIP-003-9 to CIP-003-12 and understands that the revisions make conforming changes in alignment with Project 2016-02 and is supportive of the alignment.

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer

No

Document Name

Comment

Tacoma Power has no concerns.

Likes 0

Dislikes 0

Response

Carey Salisbury - Santee Cooper - 5, Group Name Santee Cooper

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

James Keele - Entergy - 3

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name TVA RBB

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group**Answer** No**Document Name****Comment**

Likes 1

Lincoln Electric System, 1, Johnson Josh

Dislikes 0

Response**Robert Follini - Avista - Avista Corporation - 3****Answer** No**Document Name****Comment**

Likes 0

Dislikes 0

Response**Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC CIP****Answer** No**Document Name****Comment**

Likes 0

Dislikes 0

Response**Mike Magruder - Avista - Avista Corporation - 1****Answer** No**Document Name****Comment**

Likes 0

Dislikes 0

Response

Karen Artola - CPS Energy - 1,3,5 - Texas RE

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Tyler Schwendiman - ReliabilityFirst - 10

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Erik Gustafson - PNM Resources - 1,3 - WECC,Texas RE	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6	
Answer	No
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Rebika Yitna - Rebika Yitna On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - Rebika Yitna

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO, Group Name Manitoba Hydro Group

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez

Answer	Yes
Document Name	
Comment	
<p>• Expecting responsible entities to understand the unintended consequences of multiple changes to the same standard without any implementation time or settling time is unreasonable. Suggest following precedent set during changes to CIP-015 by making suggested changes in a new standard such as CIP-016, where CIP-003 would remain unchanged and requirements for low impact assets would be captured in the new standard. We do not agree that any changes should be made for Low Impact, but if forced to do so, the recommendation is to create a new standard.</p> <p>• Recommend canceling all changes to CIP-003-9 and the SAR should be reviewed and recommendations made to change the criterion for Medium impact based on objective and measurable criteria rather than expect responsible entities to acquiesce to the recommendation by the LICRT to change all low impact requirements.</p>	
Likes	0
Dislikes	0
Response	
Selene Willis - Edison International - Southern California Edison Company - 5	
Answer	Yes
Document Name	
Comment	
See comments from EEI	
Likes	0
Dislikes	0
Response	
Michael Moltane - International Transmission Company Holdings Corporation - 1	
Answer	Yes
Document Name	
Comment	
Support EEI	
Likes	0
Dislikes	0
Response	

Constantin Chitescu - Ontario Power Generation Inc. - 5**Answer** Yes**Document Name****Comment**

OPG supports NPCC Regional Standards Committee's comments.

Likes 0

Dislikes 0

Response**Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group****Answer** Yes**Document Name****Comment**

WEC Energy Group supports the comments of EEI.

Likes 0

Dislikes 0

Response**Leshel Hutchings - AEP - 3****Answer** Yes**Document Name****Comment**

AEP has reviewed the redlines and concur with EEI's comments below understands that the revisions make conforming changes in alignment with Project 2016-02 and is supportive of the alignment. EEI suggests the following clarification, which we feel is non-substantive and in alignment with the intention of the DT, in Attachment 1:

Responsible Entities with multiple-impact BCS ratings can utilize policies, procedures, and processes for their high or medium impact BCS to fulfill the sections for the development of low impact cyber security plan(s). **Responsible Entities with Shared Cyber Infrastructure (SCI) that supports a low impact BCS can utilize policies, procedures, and processes for their SCI supporting high or medium impact BCS to fulfill the sections for the development of low impact cyber security plan(s).** Each Responsible Entity can develop a cyber security plan(s) either by individual asset or groups of assets.

The defined term SCI applies when it hosts or provides storage resources required for system functionality for one or more Virtual Cyber Assets (VCAs) and one or more VCAs that are not included in, or associated with, BCS of the same impact categorization. Where a higher level of controls is applied to the SCI supporting low impact BCS, Entities should be able to use them to satisfy the requirements applicable to SCI in CIP-003-12, Attachment 1.

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer

Yes

Document Name

Comment

Dominion Energy would like clarification on the SCI and the phrase from the technical rationale document for Project 2021-02, "However, network switches and other hardware that does enforce an ESP" specifically clarification on "other hardware". Does this term include the firewall that is creating the ESP?

Likes 0

Dislikes 0

Response

Jeffrey Streifling - NB Power Corporation - 1

Answer

Yes

Document Name

Comment

It's very confusing to review two separate versions of the same standard at the same time. Preferably one version should be reviewed at a time. Also having so many different projects working on one standard at the same time creates confusion.

We are confused with the foundation starting with CIP-003-9 which was modified based upon project 2016-02 virtualization creating CIP-003-10 which has not been approved by FERC. CIP-003-11 changes do not appear to align or clearly track the changes in the last approved CIP-003-9 language. CIP-003-12 attempts to combine CIP-003-10 and the proposed CIP-003-11 but does not seem to capture all changes. TFIST recommends merging the proposed language in CIP-003-11 and CIP-003-12, merge the implementation plans, and repost after FERC approves CIP-003-10 in a new ballot.

Additionally, we have concerns with the use of the SCI term and the possibility the EACMS, PACS at High or Medium Facilities may also have to comply with CIP-003-12 requirements which may be different than High and Medium requirements. We observed that SCI devices at High or Medium locations may be subject to documenting all inbound communication at the location which could be a substantial burden at a High and Medium location which would include corporate and non-BCS communications. It is proposed that SCI devices be high water marked to High/Medium or Low requirements.

Likes 0

Dislikes 0

Response

Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer

Yes

Document Name

Comment

EEl has reviewed the redline of CIP-003-9 to CIP-003-12 and understands that the revisions make conforming changes in alignment with Project 2016-02 and is supportive of the alignment. EEl suggests the following clarification, which we feel is non-substantive and in alignment with the intention of the DT, in Attachment 1:

Responsible Entities with multiple-impact BCS ratings can utilize policies, procedures, and processes for their high or medium impact BCS to fulfill the sections for the development of low impact cyber security plan(s). **Responsible Entities with Shared Cyber Infrastructure (SCI) that supports a low impact BCS can utilize policies, procedures, and processes for their SCI supporting high or medium impact BCS to fulfill the sections for the development of low impact cyber security plan(s).** Each Responsible Entity can develop a cyber security plan(s) either by individual asset or groups of assets.

The defined term SCI applies when it hosts or provides storage resources required for system functionality for one or more Virtual Cyber Assets (VCAs) and one or more VCAs that are not included in, or associated with, BCS of the same impact categorization. Where a higher level of controls is applied to the SCI supporting low impact BCS, Entities should be able to use them to satisfy the requirements applicable to SCI in CIP-003-12, Attachment 1.

Likes 0

Dislikes 0

Response

TRACEY JOHNSON - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer

Yes

Document Name

Comment

Southern Indiana Gas and Electric d/b/a CenterPoint Energy Indiana South (SIGE) has concerns that having multiple versions of the standard simultaneously working on modifications causing confusion. Without having approved versions prior to making proposed revisions seems a bit premature.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Alan Kloster

Answer Yes

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute for Question #6.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments

Answer Yes

Document Name

Comment

Black Hills Corporation agrees with EEI. Black Hills Corporation has reviewed the redline of CIP-003-9 to CIP-003-12 and understands that the revisions make conforming changes in alignment with Project 2016-02 and is supportive of the alignment. EEI suggests the following clarification, which we feel is non-substantive and in alignment with the intention of the DT, in Attachment 1:

Responsible Entities with multiple-impact BCS ratings can utilize policies, procedures, and processes for their high or medium impact BCS to fulfill the sections for the development of low impact cyber security plan(s). **Responsible Entities with Shared Cyber Infrastructure (SCI) that supports a low impact BCS can utilize policies, procedures, and processes for their SCI supporting high or medium impact BCS to fulfill the sections for the development of low impact cyber security plan(s).** Each Responsible Entity can develop a cyber security plan(s) either by individual asset or groups of assets.

The defined term SCI applies when it hosts or provides storage resources required for system functionality for one or more Virtual Cyber Assets (VCAs) and one or more VCAs that are not included in, or associated with, BCS of the same impact categorization. Where a higher level of controls is applied to the SCI supporting low impact BCS, Entities should be able to use them to satisfy the requirements applicable to SCI in CIP-003-12, Attachment 1.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

Exelon supports the comments submitted by the EEI for this question.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer

Yes

Document Name

Comment

Exelon is aligned with EEI in response to this question.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer

Yes

Document Name

Comment

Comments and ballots on CIP-003-11 and 12 are confusing> To avoid complications, the others should be abandoned and only one should be released.

Likes 0

Dislikes 0

Response

Richard Vendetti - NextEra Energy - 5

Answer

Yes

Document Name

Comment

NEE supports EEI's comments: "EEI has reviewed the redline of CIP-003-9 to CIP-003-12 and understands that the revisions make conforming changes in alignment with Project 2016-02 and is supportive of the alignment. EEI suggests the following clarification, which we feel is non-substantive and in alignment with the intention of the DT, in Attachment 1:

Responsible Entities with multiple-impact BCS ratings can utilize policies, procedures, and processes for their high or medium impact BCS to fulfill the sections for the development of low impact cyber security plan(s). **Responsible Entities with Shared Cyber Infrastructure (SCI) that supports a low impact BCS can utilize policies, procedures, and processes for their SCI supporting high or medium impact BCS to fulfill the sections for the development of low impact cyber security plan(s).** Each Responsible Entity can develop a cyber security plan(s) either by individual asset or groups of assets.

The defined term SCI applies when it hosts or provides storage resources required for system functionality for one or more Virtual Cyber Assets (VCAs) and one or more VCAs that are not included in, or associated with, BCS of the same impact categorization. Where a higher level of controls is applied to the SCI supporting low impact BCS, Entities should be able to use them to satisfy the requirements applicable to SCI in CIP-003-12, Attachment 1."

Likes 0

Dislikes 0

Response

Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 5

Answer

Yes

Document Name

Comment

Supporting EEI comments

Likes 0

Dislikes 0

Response

Alison Nickells - NiSource - Northern Indiana Public Service Co. - 1 - RF

Answer

Yes

Document Name

Comment

Combining multiple versions of a Reliability Standard Under Development into one (1) ballot is proving to be overtly onerous. It would be more beneficial if CIP-003-11 and CIP-003-12 language were combined into one (1) version of the Standard to be evaluated and balloted upon.

Likes 0

Dislikes 0

Response

Matt Carden - Southern Company - Southern Company Services, Inc. - 1

Answer

Yes

Document Name

Comment

Southern Company is in agreement with the EEI comments:

EEI has reviewed the redline of CIP-003-9 to CIP-003-12 and understands that the revisions make conforming changes in alignment with Project 2016-02 and is supportive of the alignment. EEI suggests the following clarification, which we feel is non-substantive and in alignment with the intention of the DT, in Attachment 1:

Responsible Entities with multiple-impact BCS ratings can utilize policies, procedures, and processes for their high or medium impact BCS to fulfill the sections for the development of low impact cyber security plan(s). **Responsible Entities with Shared Cyber Infrastructure (SCI) that supports a low impact BCS can utilize policies, procedures, and processes for their SCI supporting high or medium impact BCS to fulfill the sections for the development of low impact cyber security plan(s).** Each Responsible Entity can develop a cyber security plan(s) either by individual asset or groups of assets.

The defined term SCI applies when it hosts or provides storage resources required for system functionality for one or more Virtual Cyber Assets (VCAs) and one or more VCAs that are not included in, or associated with, BCS of the same impact categorization. Where a higher level of controls is applied to the SCI supporting low impact BCS, Entities should be able to use them to satisfy the requirements applicable to SCI in CIP-003-12, Attachment 1.

Likes 0

Dislikes 0

Response

Robert Kerrigan - Los Angeles Department of Water and Power - 5

Answer

Yes

Document Name

Comment

Comments: CIP-003-12 seems better developed than CIP-003-11, in that it includes more concepts. The main comment about CIP-003-12 is that it includes two terms, "VCA" and "SCI", that are new per virtualization project – will the terms be added into the standard itself or will the DT ensure they be added to the NERC glossary of terms?

Likes 0

Dislikes 0

Response

Fausto Serratos - Los Angeles Department of Water and Power - 3

Answer

Yes

Document Name

Comment

CIP-003-12 seems better developed than CIP-003-11, in that it includes more concepts. The main comment about CIP-003-12 is that it includes two terms, "VCA" and "SCI", that are new per virtualization project – will the terms be added into the standard itself or will the DT ensure they be added to the NERC glossary of terms?

Likes 0

Dislikes 0

Response

Ijad Dewan - Hydro One Networks, Inc. - 1 - NPCC

Answer

Yes

Document Name

Comment

It's very confusing to review two separate versions of the same standard at the same time. Preferably one version should be reviewed at a time. Also having so many different projects working on one standard at the same time creates confusion.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Yes

Document Name

Comment

See FirstEnergy's response to Q1.

Likes 0

Dislikes 0

Response

Ellese Murphy - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF

Answer

Yes

Document Name

Comment

Duke Energy supports the non-substantive revisions proposed by EEI.

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Marvin Johnson - DTE Energy - Detroit Edison Company - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer

Document Name

Comment

It's very confusing to review two separate versions of the same standard at the same time. Preferably one version should be reviewed at a time. Also having so many different projects working on one standard at the same time creates confusion.

We are confused with the foundation starting with CIP-003-9 which was modified based upon project 2016-02 virtualization creating CIP-003-10 which has not been approved by FERC. CIP-003-11 changes do not appear to align or clearly track the changes in the last approved CIP-003-9 language. CIP-003-12 attempts to combine CIP-003-10 and the proposed CIP-003-11 but does not seem to capture all changes. TFIST recommends merging the proposed language in CIP-003-11 and CIP-003-12, merge the implementation plans, and repost after FERC approves CIP-003-10 in a new ballot.

Additionally, we have concerns with the use of the SCI term and the possibility the EACMS, PACS at High or Medium Facilities may also have to comply with CIP-003-12 requirements which may be different than High and Medium requirements. We observed that SCI devices at High or Medium locations may be subject to documenting all inbound communication at the location which could be a substantial burden at a High and Medium location which would include corporate and non-BCS communications. It is proposed that SCI devices be high water marked to High/Medium or Low requirements.

Likes	0
Dislikes	0
Response	

The DT created a CIP-003-12 standard, CIP-003-12 implementation plan and a summary of changes document for this posting. Please review these files prior to answering this question.

7. Do you have any concerns in the CIP-003-12 implementation plan that should be addressed?

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer No

Document Name

Comment

Tacoma Power has no concerns.

Likes 0

Dislikes 0

Response

Richard Vendetti - NextEra Energy - 5

Answer No

Document Name

Comment

NEE supports EEI's comments: "EEI supports the CIP-003-12 implementation plan."

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 5

Answer No

Document Name

Comment

NA.

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC

Answer No

Document Name

Comment

SMUD agrees with the comments submitted by the MRO NSRF.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer No

Document Name

Comment

The NAGF agrees with the proposed CIP-003-12 implementation plan.

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Rebika Yitna - Rebika Yitna On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - Rebika Yitna

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Fausto Serratos - Los Angeles Department of Water and Power - 3

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Erik Gustafson - PNM Resources - 1,3 - WECC,Texas RE

Answer No

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Robert Kerrigan - Los Angeles Department of Water and Power - 5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Tyler Schwendiman - ReliabilityFirst - 10

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Karen Artola - CPS Energy - 1,3,5 - Texas RE

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response**Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC CIP****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Robert Follini - Avista - Avista Corporation - 3****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name TVA RBB****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

James Keele - Entergy - 3

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Carey Salisbury - Santee Cooper - 5, Group Name Santee Cooper

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO, Group Name Manitoba Hydro Group

Answer Yes

Document Name

Comment

Manitoba Hydro appreciates the standard drafting team's intent that the timeline set forth for CIP-003-12 be the later of 36-months from CIP-003-11 approval or 24-months from CIP-003-12 approval, giving entities at least 36-months of time to implement the changes. However, there is the possibility that CIP-003-11 does not receive governmental approval, and the version is "skipped" going straight to CIP-003-12. In this scenario, only 24-months of implementation would be afforded. This would not give entities enough time, especially if the standard changes require additional staff, hardware or architecture changes. Manitoba Hydro suggests that the implementation plan effective date for CIP-003-12 be revised to match CIP-003-11 and state that the standard become effective thirty-six (36) months after the effective date of the applicable governmental authority's order approving Reliability Standard CIP-003-12.

Likes 0

Dislikes 0

Response

Ellese Murphy - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF

Answer Yes

Document Name

Comment

Duke Energy supports EEI comments.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer Yes

Document Name

Comment

See FirstEnergy's response to Q3.

Likes 0

Dislikes 0

Response

Ijad Dewan - Hydro One Networks, Inc. - 1 - NPCC

Answer Yes

Document Name

Comment

When looking at implementation of plans of CIP-003-10, CIP-003-11, and CIP-003-12 it becomes confusing to decipher what is the actual effective date of CIP-003-12. There are too many dependencies involved.

Likes 0

Dislikes 0

Response

Matt Carden - Southern Company - Southern Company Services, Inc. - 1

Answer Yes

Document Name

Comment

Southern Company is in agreement with the EEI comments:

EEI is concerned about the proposed effective date for CIP-003-12. CIP-003-12 is the alignment of the Project 2023-04 changes with conforming changes from Project 2016-02 Virtualization, which is pending FERC approval. Given its pending approval, it is difficult to understand if the 24-month period would provide a shorter implementation timeframe than the 36-month period proposed for CIP-003-11. EEI supports a 36-month implementation period for the draft revisions and asks for that timeframe regardless of the version of CIP-003 approved.

Likes 0

Dislikes 0

Response

Alison Nickells - NiSource - Northern Indiana Public Service Co. - 1 - RF

Answer Yes

Document Name

Comment

With multiple versions of implementation plans as they pertain to the different versions of a Reliability Standard Under Development, it is challenging to discern the applicable timelines and the organizational impacts of the implementation

Likes 0

Dislikes 0

Response

Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 5

Answer Yes

Document Name

Comment

Supporting EEl comments

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer Yes

Document Name

Comment

This should state 24 months after the implementation of CIP -003-11 not CIP 003-9. The way it is currently written, implementation would be required earlier than CIP-003-11.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer Yes

Document Name

Comment

Exelon is aligned with EEl in response to this question.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

Exelon supports the comments submitted by the EEI for this question.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments

Answer Yes

Document Name

Comment

Black Hills Corporation agrees with EEI's comments: Black Hills Corporation is concerned about the proposed effective date for CIP-003-12. CIP-003-12 is the alignment of the Project 2023-04 changes with conforming changes from Project 2016-02 Virtualization, which is pending FERC approval. Given its pending approval, it is difficult to understand if the 24-month period would provide a shorter implementation timeframe than the 36-month period proposed for CIP-003-11. EEI supports a 36-month implementation period for the draft revisions and asks for that timeframe regardless of the version of CIP-003 approved.

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer Yes

Document Name

Comment

The NSRF appreciates the standard drafting team's intent that the timeline set forth for CIP-003-12 be the later of 36-months from CIP-003-11 approval or 24-months from CIP-003-12 approval, giving entities at least 36-months of time to implement the changes. However, there is the possibility that CIP-003-11 does not receive governmental approval, and the version is "skipped" going straight to CIP-003-12. In this scenario, only 24-months of implementation would be afforded. This would not give entities enough time, especially if the standard changes require additional staff, hardware or architecture changes. The NSRF suggests that the implementation plan effective date for CIP-003-12 be revised to match CIP-003-11 and state that the

standard become effective thirty-six (36) months after the effective date of the applicable governmental authority's order approving Reliability Standard CIP-003-12.

Likes 1 Lincoln Electric System, 1, Johnson Josh

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Alan Kloster

Answer Yes

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute and MRO NSRF for Question #7.

Likes 0

Dislikes 0

Response

TRACEY JOHNSON - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer Yes

Document Name

Comment

Southern Indiana Gas and Electric d/b/a CenterPoint Energy Indiana South (SIGE) has the same concerns as addressed in question 6.

Likes 0

Dislikes 0

Response

Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

EEl is concerned about the proposed effective date for CIP-003-12. CIP-003-12 is the alignment of the Project 2023-04 changes with conforming changes from Project 2016-02 Virtualization, which is pending FERC approval. Given its pending approval, it is difficult to understand if the 24-month

period would provide a shorter implementation timeframe than the 36-month period proposed for CIP-003-11. EEI supports a 36-month implementation period for the draft revisions and asks for that timeframe regardless of the version of CIP-003 approved.

Likes 0

Dislikes 0

Response

Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nick Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh

Answer

Yes

Document Name

Comment

NST has the following two concerns about the CIP-003-12 implementation plan:

(1) We note the section, "Prerequisite Standards" lists only CIP-003-11. We believe it should also be necessary for CIP-003-10 to be approved before CIP-003-12 can become effective.

(2) We note the section, "Effective Date" identifies two possible scenarios (36 months after FERC approval of CIP-003-11 or 24 months after FERC approval of CIP-003-12) that seem to be based on an implicit assumption that by such time FERC approval is given to either Version 11 or Version 12, CIP-003-10 will have been previously approved. Although the NERC BoT has approved the "-10" version, it has not yet been approved by FERC, and NST believes this fact should be reflected in the current version of the "-12" implementation plan.

Likes 0

Dislikes 0

Response

Jeffrey Streifling - NB Power Corporation - 1

Answer

Yes

Document Name

Comment

When looking at implementation of plans of CIP-003-10, CIP-003-11, and CIP-003-12 it becomes confusing to decipher what is the actual effective date of CIP-003-12. There are too many dependencies involved.

CIP-003-11 and CIP-003-12 implementation plan should be combined and repost after FERC approves CIP-003-10 in a new ballot. TFIST recommends only having one implementation timeframe and TFIST prefers 36-month timeframe.

Likes 0

Dislikes 0

Response	
Leshel Hutchings - AEP - 3	
Answer	Yes
Document Name	
Comment	
AEP has the same concerns as EEI--concerned about the proposed effective date for CIP-003-12. CIP-003-12 is the alignment of the Project 2023-04 changes with conforming changes from Project 2016-02 Virtualization, which is pending FERC approval. Given its pending approval, it is difficult to understand if the 24-month period would provide a shorter implementation timeframe than the 36-month period proposed for CIP-003-11. EEI supports a 36-month implementation period for the draft revisions and asks for that timeframe regardless of the version of CIP-003 approved.	
Likes	0
Dislikes	0
Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
WEC Energy Group supports the comments of EEI.	
Likes	0
Dislikes	0
Response	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
OPG supports NPCC Regional Standards Committee's comments.	
Likes	0
Dislikes	0

Response

Michael Moltane - International Transmission Company Holdings Corporation - 1

Answer Yes

Document Name

Comment

Support EEI

Likes 0

Dislikes 0

Response

Selene Willis - Edison International - Southern California Edison Company - 5

Answer Yes

Document Name

Comment

See comments from EEI

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez

Answer Yes

Document Name

Comment

• Expecting responsible entities to understand the unintended consequences of multiple changes to the same standard without any implementation time or settling time is unreasonable.

Likes 0

Dislikes 0

Response

Marvin Johnson - DTE Energy - Detroit Edison Company - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE requests the SDT consider adding verbiage to the Initial Performance of Periodic Requirements section to include initial performance expectations for newly registered entities and for entities for which CIP-003 did not previously apply.

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer

Document Name

Comment

When looking at implementation of plans of CIP-003-10, CIP-003-11, and CIP-003-12 it becomes confusing to decipher what is the actual effective date of CIP-003-12. There are too many dependencies involved.

CIP-003-11 and CIP-003-12 implementation plan should be combined and repost after FERC approves CIP-003-10 in a new ballot. TFIST recommends only having one implementation timeframe and TFIST prefers 36-month timeframe.

Likes 0

Dislikes 0

Response

Chantal Mazza - Chantal Mazza On Behalf of: Junji Yamaguchi, Hydro-Quebec (HQ), 1, 5; - Chantal Mazza

Answer

Document Name

Comment

This comment applies to all questions :It's very confusing to review two separate versions of the same standard at the same time. Preferably one version should be reviewed at a time. Also having so many different projects working on one standard at the same time creates confusion.

Likes 0

Dislikes 0

Response