Unofficial Comment Form

Project 2019-02 BES Cyber System Information Access Management

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Project 2019-02 BES Cyber System Information Access Management**. Comments must be submitted by **8 p.m. Eastern, April 26, 2019.  
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://nerc.com/pa/Stand/Pages/Project2019-02BCSIAccessManagement.aspx). If you have questions, contact Senior Standards Developer, [Latrice Harkness](mailto:latrice.harkness@nerc.net) (via email), or at 404-446-9728.

## Background Information

The purpose of this project is to clarify the CIP requirements related to BES Cyber System Information (BCSI) access, to allow for alternative methods, such as encryption, to be utilized in the protection of BCSI.

The proposed scope of this project would entail modifications to CIP-004-6 and CIP-011-2. The SAR describes the proposed scope as follows:

CIP-004-6 Requirement R4 Part 4.1.3 needs to be modified so authorization and access to BCSI is clarified to focus on the BCSI and the controls deployed to limit access. In addition, the Standard should allow multiple methods for controlling access to BES Cyber System Information, rather than just electronic and physical access to the BES Cyber System Information storage location. For example, the focus must be on BCSI and the ability to obtain and make use of it. This is particularly necessary when it comes to the utilization of a third party’s system (aka cloud). As currently drafted, the requirement is focused on access to the “storage location”, and therefore does not permit methods such as encryption and key management to be utilized in lieu of physical/electronic access controls. This wording also does not explicitly permit any flexibility in the audit approach. In addition to modifying CIP-004-6 Requirement R4 Part 4.1.3, Part 4.4, Part 5.3 and CIP-011-2 Requirement R1 should also be evaluated for any subsequent impacts to the requirements, measures and/or the guidelines and technical basis.

## Questions

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

Yes

No

Comments:

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

Comments: