Unofficial Comment Form

Project 2020-04 Modifications to CIP-012

**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 2020-04 Modifications to CIP-012** by **8 p.m. Eastern, June 9, 2021.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project202004ModificationstoCIP-012.aspx). If you have questions, contact Senior Standards Developer, Alison Oswald (via email), or at 404-446-9668.

## Background Information

In Order No. 866, FERC stated that “maintaining the availability of communication networks and data should include provisions for incident recovery and continuity of operations in a responsible entity's compliance plan." FERC recognized that the redundancy of communication links cannot always be guaranteed, and acknowledged there should be plans for both recovery of compromised communication links and use of backup communication capability. The proposed scope of this project would entail modifications to CIP-012 – Communications between Control Centers.

The purpose of this project is to address a directive issued by the Federal Energy Regulatory Commission (FERC) in Order No. 866 to develop modifications to the CIP Reliability Standards to require protections regarding the availability of communication links and data communicated between the bulk electric system Control Centers**.**

## Questions

1. The SDT revised CIP-012-1 and added R2 to meet the directives outlined in FERC Order No. 866 seeking to provide for the availability of real-time assessment and real-time monitoring data while in transit between control centers. Do you agree with the proposed R2 language? If not please provide comments and suggested requirement language.

[ ]  Yes

[ ]  No

Comments:

1. The SDT proposes that the modifications in CIP-012-2 meet the FERC directives in a cost effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. The SDT is proposing a 24-month implementation plan. Do you agree with the proposed timeframe? If you think an alternate timeframe is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.

[ ]  Yes

[ ]  No

Comments:

1. Provide any additional comments for the standard drafting team to consider, including the provided technical rationale document, if desired.

Comments: