Unofficial Comment Form

Project 2021-03 CIP-002

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **CIP-002-Y — Cyber Security — BES Cyber System Categorization** by **8 p.m. Eastern, Thursday, November 9, 2023.**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project%202021-03%20CIP-002%20Transmission%20Owner%20Control%20Centers.aspx). If you have questions, contact Standards Developer, Dominique Love (via email), or at (404) 217-7578.

## Background Information

Project 2021-03 currently has five assigned Standard Authorization Requests (SARs). The proposed standard revisions are based on the Project 2016-02 Modifications to CIP Standards [SAR](https://www.nerc.com/pa/Stand/Project202103_CIP002_Transmission_Owner_Control_Ce/CIP_SAR_822_directives_V5TAG_2016June1_clean.pdf) which seeks to modify Reliability Standard CIP-002 to address the categorization of certain Transmission Owner Control Centers performing Transmission Operator functions as medium impact based on an aggregate weighted value of their BES Transmission Lines in Criterion 2.12. The remaining four SARs will be addressed at a later date.

The Standards Committee (SC) assigned a portion of the Project 2016-02 SAR to the Project 2021-03 standard drafting team (SDT) at its March 17, 2021 meeting. In addition, the SDT assisted NERC staff in meeting the directive from the NERC Board of Trustees to conduct further study of the need to readdress the applicability of the Critical Infrastructure Protection Reliability Standards to theses Control Centers to support reliability. To help meet this directive and the scope of the SAR, the SDT initiated a field test. The SC approved the Project 2021-03 [Field Test Plan](https://www.nerc.com/pa/Stand/Project202103_CIP002_Transmission_Owner_Control_Ce/2021-03%20CIP-002%20TOCC%20Field%20Test.pdf) on November 17, 2021. Three fields tests were conducted in 2022 and the [final report](https://www.nerc.com/pa/Stand/Project202103_CIP002_Transmission_Owner_Control_Ce/2021-03_CIP-002_TOCC_Field_Test_Final_Report_01262023.pdf) was posted to the project page in January 2023. Lastly, the SDT conducted an informal comment period from June 13 – July 12, 2023 to solicit feedback on proposed standard language.

## Summary of changes Overview

The SDT made modifications to the Reliability Standard and Control Center Definition accordingly. For a detailed explanation of these changes, please refer to the *CIP-002-Y Technical Rationale*.

There are currently two drafting teams working on modifications to CIP-002-5.1a. The Project 2021-03 SDT is posting modifications as CIP-002-Y to differentiate its work from Project 2016-02 Modifications to CIP Standards (CIP-002-7).

In addition, the proposed revised definition is not balloted separately but is being balloted via the standard. As such, when voting on the standard, ballot body participants will also be voting on the proposed revised definition used in the standard.

## Questions

1. The SDT has modified the Control Center definition based on ambiguity that surfaced during the field test and industry comments from the informal comment period. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT added the following preface to Criteria 2.11, 2.12 and 2.13: “Each BES Cyber System, not included in Section 1 above, used by and located at any of the following:”. This was intentional, to make clear that the BES Cyber Systems to consider differ between Control Centers and other assets such as Transmission stations and Generation resources. In alignment with Part 1 of Attachment 1, BES Cyber Systems ‘used by and located at’ Control Centers need to be considered. This prevents expanding from Control Centers down into field assets. With respect to other assets, it is BES Cyber Systems ‘associated with’ the assets that are considered. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT revised CIP-002-Y Attachment 1 Criterion 2.12 based on data obtained from the field test and industry comments from the informal comment period. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. Provide any additional comments for the SDT to consider, if desired.

Comments: