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 **Project** **2021-03 CIP-002** by **8 p.m. Eastern, Thursday, May 16, 2024.**

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 [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 (TOCC) performing Transmission Operator (TOP) 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) were posted to the project page in January 2023.

## Summary of changes Overview

The SDT reviewed all comments and made modifications to the Reliability Standard and Control Center Definition accordingly. The most extensive changes were made to CIP-002 regarding the functional obligation language throughout the attachment 1 which has been replaced with specific references to Control Centers that are either operated by or owned by the relevant Registered Entities. 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 its modifications as CIP-002-Y to differentiate its work from Project 2016-02 Modifications to CIP Standards, which has posted 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. Based on industry comments, the SDT has modified the Control Center definition. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. Language throughout Attachment 1 of CIP-002-Y that referred to the “functional obligations” of the different Registered Entities has been replaced with specific references to Control Centers that are either operated by or owned by the relevant Registered Entities. This change was incorporated given that the NERC Functional Model is no longer being actively maintained. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal. Does the change introduce reliability gaps to the Registered Entities? If it does, please provide your rationale.

[ ]  Yes

[ ]  No

Comments:

1. The SDT intentionally constructed the exclusion clause within criteria 2.12 of Attachment 1 of CIP-002-Y to require an entity to measure gross export from their defined group of contiguous transmission Elements (GCTE). This accounts for both generation output and flow-through the GCTE. It ensures that an entity is unable to define a GCTE that contains significant generation that supports the BES or with significant flow-through that impacts the BES. 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 standard drafting team to consider, if desired.

Comments: