

June 18, 2025

Dr. Trey Melcher
Burns & McDonnell

Dear Dr. Trey,

Thank you for submitting a Standard Authorization Request (SAR) dated February 3, 2023 titled CIP-002 Communications Protocol Converters SAR.

Pursuant to Section 4.2 of the NERC Standard Processes Manual (SPM), Appendix 3A to the NERC Rules of Procedure, I write to inform you that on June 12, 2025, the Standards Committee (SC) reviewed and rejected the SAR submitted by NERC for good cause. The SAR was rejected on the grounds of the SAR not clearly defining the reliability risks to the BES and its scope of work lacked stakeholder support.

For additional information on this matter, please see the attached background document and review this [link](#) to the comments received in response to a public SAR posting, and SAR. These documents were considered at the June 12, 2025 SC meeting.

Thank you for your continued support of the Standards Development process. I look forward to our future collaborations.

Sincerely,



Todd Bennett
Chair, NERC Standards Committee
tbennett@aeci.org

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Project 2021-03 CIP-002

Action

Reject the CIP-002 Communications Protocol Converters Standard Authorization Request (SAR), with a written response to the submitter.

Background

Project 2021-03 currently has four active Standard Authorization Requests (SARs) assigned to it:

- [CIP-002 and CIP-014](#) -Seeks to modify the standards to replace/update language with regards to “critical to the derivation of the Interconnection Reliability Operating Limits (IROLS) to appropriately identify facilities.”
- [CIP-002 Communication Protocol Converters](#) - Seeks to include the identification of communication protocol converters and the relationship to the exception in Section 4.2.3 of CIP-002.
- [CIP-002-5.1a Criterion 1.3 Revision SAR](#) - Seeks to add Criterion 2.6 to the list of Criteria in Criterion 1.3 in Attachment 1 of CIP-002-5.1a. This project will require the Transmission Operator (TOP) to categorize its BES Cyber System(s) as high impact that meet Criterion 2.6 as is also required of the Balancing Authority and Generator Operator in Criterion 1.2 and 1.4, respectively. By including Criterion 2.6 in Criterion 1.3, the TOP’s BES Cyber Systems(s) will be properly categorized as high impact for Transmission Facilities at a single station or substation location that is identified as critical to the derivation of IROLS and their associated contingencies.
- Modifications to CIP-002 Identification - Seeks to centralize the identification of Protected Cyber Assets (PCA), Electronic Access Control or Monitoring Systems (EACMS), and Physical Access Control Systems (PACS) as “CIP applicable” systems in a single standard. This SAR was accepted at the May 2025 SC meeting and is anticipated to be posted for a 30-day formal comment period the week of June 9, 2025.

The Project 2021-03 Drafting Team (DT) was initially formed by the Standards Committee (SC) on March 17, 2021, to conduct a field test and address a portion of the Project 2016-02 SAR that related to Transmission Owners Control Centers (TOCC).

Phase one of the project focused on the TOCC portion of the Project 2016-02 SAR, which addressed the categorization of certain TOCC performing Transmission Operator (TOP) functions as medium impact based on an aggregate weighted value of their Bulk Electric System (BES) Transmission Lines in Criterion 2.12. Phase one was completed and the Board adopted CIP-002-8 on December 10, 2024, which was filed with FERC on December 20, 2024.

Project 2021-03 CIP-002 is currently in phase two of development. On January 19, 2022, the SC accepted the CIP-002-5.1a - Serial Communications Request for Interpretation (RFI). During its February 16, 2022, meeting, the SC assigned the RFI to Project 2021-03 – CIP-002 and authorized solicitation for supplemental DT members. From May 23, 2022, through June 22,

2022, NERC solicited supplemental nominations and the supplemental DT members were appointed at the September 21, 2022, SC meeting.

After reviewing the RFI, the DT determined that the issue raised could be considered as part of this drafting team's work given the team is already modifying CIP-002. NERC staff worked with Burns & McDonnell, the original RFI submitters, to draft a SAR. At the February 22, 2023, meeting, the SC rejected the CIP-002-5.1a - Serial Communications RFI, accepted the CIP-002 Communications Protocol Converters SAR, authorized posting of the SAR for a 30-day formal comment period, and assigned the SAR to Project 2021-03 CIP-002 DT.

The Protocol Converters SAR posted for formal comment from March 02, 2023 – March 31, 2023. The DT reviewed the CIP-002 Communications Protocol Converters SAR comments on April 29, 2025. Based on the comments, the DT concluded that the SAR should not be pursued due to the SAR not clearly defining the reliability risks to the BES and that the scope of work of the SAR does not meet the CIP-002, CIP-003, and CIP-005 requirements or purpose. Industry commenters expressed that CIP-002 was not the right standard to address the SAR as the determination of whether a Cyber Asset is a BES Cyber Asset does not fall within CIP-002. A link to the summary response is provided [here](#). The DT voted unanimously to recommend that the SC reject the SAR.

NERC Standard Processes Manual Section 4.2 SAR Posting provides as follows:

- The SC, once again considering the public comments received and their resolution, may then take one of the following actions:
 - Authorize drafting the proposed Reliability Standard or revisions to a Reliability Standard.
 - Reject the SAR with a written explanation to the sponsor and post that explanation.

Summary

NERC staff and the DT recommends the SC reject the CIP-002 Communications Protocol Converters SAR, with a written response to the submitter.

This project is designated as medium priority, consistent with the NERC prioritization criteria.

Standard Authorization Request (SAR)

Complete and submit this form, with attachment(s) to the [NERC Help Desk](#). Upon entering the Captcha, please type in your contact information, and attach the SAR to your ticket. Once submitted, you will receive a confirmation number which you can use to track your request.

The North American Electric Reliability Corporation (NERC) welcomes suggestions to improve the reliability of the bulk power system through improved Reliability Standards.

Requested information			
SAR Title:		CIP-002 Communications Protocol Converters SAR	
Date Submitted:		February 3, 2023	
SAR Requester			
Name:		Dr. Trey Melcher	
Organization:		Burns & McDonnell	
Telephone:		Email:	tmelcher@burnsmcd.com
SAR Type (Check as many as apply)			
☐ New Standard		☐ Imminent Action/ Confidential Issue (SPM Section 10)	
☒ Revision to Existing Standard		☐ Variance development or revision	
☐ Add, Modify or Retire a Glossary Term		☐ Other (Please specify)	
☐ Withdraw/retire an Existing Standard			
Justification for this proposed standard development project (Check all that apply to help NERC prioritize development)			
☐ Regulatory Initiation		☐ NERC Standing Committee Identified	
☐ Emerging Risk (Reliability Issues Steering Committee) Identified		☐ Enhanced Periodic Review Initiated	
☐ Reliability Standard Development Plan		☒ Industry Stakeholder Identified	
Industry Need (What Bulk Electric System (BES) reliability benefit does the proposed project provide?):			
Protocol converters, if compromised, pose a threat to their connected BES Cyber System by virtue of aggregating serial system-to-system communications from substations to Control Center BES Cyber Systems. As such, this project supports reliability by clarifying when these protocol converters should be within a defined Electronic Security Perimeter.			
Purpose or Goal (How does this proposed project provide the reliability-related benefit described above?):			
This project would provide clarification through revisions to CIP-002 on when a communication protocol converter meets the definition of a BES Cyber Asset			
Project Scope (Define the parameters of the proposed project):			
This project will make revisions to CIP-002 to clarify communication protocol converters meet the definition of a BES Cyber Asset and have a 15-minute impact.			

Requested information
Detailed Description (Describe the proposed deliverable(s) with sufficient detail for a drafting team to execute the project. If you propose a new or substantially revised Reliability Standard or definition, provide: (1) a technical justification ¹ which includes a discussion of the reliability-related benefits of developing a new or revised Reliability Standard or definition, and (2) a technical foundation document (e.g., research paper) to guide development of the Standard or definition):
Revise CIP-002 to include the identification of communication protocol converters. Specifically, the revisions would be to CIP-002-5.1a Requirement R1, and relevant attachments as necessary, regarding clarification for system-to-system serial communication protocol converters between a Transmission Owner medium impact BES Cyber System that connects to a Transmission Operators BES Cyber Systems by either enforcing an authentication break or by residing inside a defined Electronic Security Perimeter (ESP).
Cost Impact Assessment, if known (Provide a paragraph describing the potential cost impacts associated with the proposed project):
Cost impact is unknown at this time.
Please describe any unique characteristics of the BES facilities that may be impacted by this proposed standard development project (e.g., Dispersed Generation Resources):
None
To assist the NERC Standards Committee in appointing a drafting team with the appropriate members, please indicate to which Functional Entities the proposed standard(s) should apply (e.g., Transmission Operator, Reliability Coordinator, etc. See the most recent version of the NERC Functional Model for definitions):
Transmission Operator and Transmission Owner
Do you know of any consensus building activities ² in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.
None
Are there any related standards or SARs that should be assessed for impact as a result of this proposed project? If so, which standard(s) or project number(s)?
NERC Project 2021-03 CIP-002
Are there alternatives (e.g., guidelines, white paper, alerts, etc.) that have been considered or could meet the objectives? If so, please list the alternatives.
None

¹ The NERC Rules of Procedure require a technical justification for new or substantially revised Reliability Standards. Please attach pertinent information to this form before submittal to NERC.

² Consensus building activities are occasionally conducted by NERC and/or project review teams. They typically are conducted to obtain industry inputs prior to proposing any standard development project to revise, or develop a standard or definition.

Reliability Principles

Does this proposed standard development project support at least one of the following Reliability Principles ([Reliability Interface Principles](#))? Please check all those that apply.

☐	1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
☐	2. The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.
☐	3. Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.
☐	4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained and implemented.
☒	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems.
☐	6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.
☐	7. The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis.
☒	8. Bulk power systems shall be protected from malicious physical or cyber attacks.

Market Interface Principles

Does the proposed standard development project comply with all of the following [Market Interface Principles](#)?

	Enter (yes/no)
1. A reliability standard shall not give any market participant an unfair competitive advantage.	Yes
2. A reliability standard shall neither mandate nor prohibit any specific market structure.	Yes
3. A reliability standard shall not preclude market solutions to achieving compliance with that standard.	Yes
4. A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards.	Yes

Identified Existing or Potential Regional or Interconnection Variances

Region(s)/ Interconnection	Explanation
e.g., NPCC	None

For Use by NERC Only

SAR Status Tracking (Check off as appropriate).

☐ Draft SAR reviewed by NERC Staff	☐ Final SAR endorsed by the SC
☐ Draft SAR presented to SC for acceptance	☐ SAR assigned a Standards Project by NERC
☐ DRAFT SAR approved for posting by the SC	☐ SAR denied or proposed as Guidance document

Version History

Version	Date	Owner	Change Tracking
1	June 3, 2013		Revised
1	August 29, 2014	Standards Information Staff	Updated template
2	January 18, 2017	Standards Information Staff	Revised
2	June 28, 2017	Standards Information Staff	Updated template
3	February 22, 2019	Standards Information Staff	Added instructions to submit via Help Desk
4	February 25, 2020	Standards Information Staff	Updated template footer