

Consideration of Comments

Project Name:	2020-03 Supply Chain Low Impact Revisions Draft 3
Comment Period Start Date:	7/6/2022
Comment Period End Date:	8/19/2022
Associated Ballot(s):	2020-03 Supply Chain Low Impact Revisions CIP-003-X AB 3 ST

There were 75 sets of responses, including comments from approximately 175 different people from approximately 105 companies representing 10 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the [project page](#).

If you feel that your comment has been overlooked, let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, contact Vice President of Engineering and Standards [Howard Gugel](#) (via email) or at (404) 446-9693.

Summary Response

Low impact BES Cyber Systems

The SDT would like to centrally address the concept of “Low having more requirements than Medium at Control Centers”, and particularly Attachment 1 Requirement 6.3. While the SDT can agree that CIP-005 R1.5 applies only at High and Medium Control Centers, the issue facing the SDT was the requirement of the SAR and the risk that it exposes. Currently, there are 23 standards that apply to Low only, that number is less than half of those that apply to Medium. This was purposeful because of their Low risk. However, when one considers the data compiled

by NERC only 11% of High and Medium assets have IP connectivity, while the number for Low is 58% and when you consider those entities with Low only that number jumps to 66%. While Low's have a low risk profile, the number of those assets connected with IP routable connections is more than five times that of High and Medium, while, High and Medium have more than twice the requirements. While adding a requirement to monitor malicious vendor traffic might look on the surface as "extending more requirements to Low than Medium", it is not the case, considering the risk profile of the connections into those assets. Additionally, the largest difference between CIP-005 R1.5 and CIP-003 Attachment 1 Section 6 is that Section 6 is relevant only to vendor electronic remote access, where CIP-005 is relevant to all communications.

Desire for "active" and "session" to be added to language

The Standard Drafting Team has had significant discussions over the last three postings on the use of the term "active." In the first two postings, the team used in the context of the Board Directive, but in the third posting the SDT decided to remove the term based on commenters concerns of unintended consequences. The team further discussed that the use of the term could create an administrative burden regarding the implied audit requirement to document when, and how, active vendor sessions occur. The team attempted to address the issue by updating the language in Section 6 so that the statement "as established under Section 3.1" applies to all parts of Section 6 to better define the communications scope. This provides the ability for entities to have more flexibility to address the scope of the requirements. The SDT did not want to limit compliance activities to a 'session'. The SDT believes that entities should determine whether a session-based approach is warranted for the risk presented to their entity.

Desire for updated or new definitions

The SDT would like to address comments around definitions in a single response. In general, the SAR for this team does not allow for new and/or modified definitions, however, there are additional reasons why this team did not add, modify, or use inappropriate definitions. Terms like Interactive Remote Access or IRA are inappropriate for use in CIP-003 because the use of this term would require technology or requirements to be use that are not applicable for low impact BES Cyber Systems, for example IRA requires an Electronic Security Perimeter or ESP that is not required at lows today (see NERC Glossary of Terms [Glossary of Terms.pdf \(nerc.com\)](https://www.nerc.com/glossary-of-terms.pdf))

Adding new definitions was also a concern for the SDT, however as mentioned about the SAR did not allow the addition, but more importantly, the SDT had to consider what the addition of new terms might have on other standards. As an example, consider "vendor", which is already used in an approved standard. Adding a definition such as this would have far reaching issues with already enforceable standards, thus the team declined to create definitions for this reason.

Attachment 1 Section 6.3 not clearly scoped to vendor communications only

The SDT thanks you for your comment. The SDT has made no substantive clarifying changes to address this concern.

Questions

1. Do you agree the updated language proposed in Attachment 1 Section 6 addresses the risk of malicious communication and vendor remote access to low impact BES cyber systems as directed by the NERC Board resolution? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.
2. The team has added clarifying language to limit the scope of this access to remote access that is conducted by vendors. Do you believe that this language is clear? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.
3. Has the SDT clarified that Attachment 1 Section 6 only addresses vendor's access to low impact assets containing BES cyber systems from remote locations? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.
4. The SDT has added clarifying language that limits the scope to Section 3.1. Do you believe the language in Attachment 1 Section 6 limits the scope to low impact BES cyber systems? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.
5. The SDT proposes that the modifications in CIP-003-X meet the NERC Board resolution 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.
6. The SDT is proposing a 36-month implementation plan for Attachment 1, Section 6 based on industry feedback. Would these proposed timeframes give enough time to put into place process, procedures or technology to meet the proposed language in Section

6? 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.

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

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
BC Hydro and Power Authority	Adrian Andreoiu	1	WECC	BC Hydro	Hootan Jarollahi	BC Hydro and Power Authority	3	WECC
					Helen Hamilton Harding	BC Hydro and Power Authority	5	WECC
					Adrian Andreoiu	BC Hydro and Power Authority	1	WECC
Tennessee Valley Authority	Brian Millard	1,3,5,6	SERC	Tennessee Valley Authority	Kurtz, Bryan G.	Tennessee Valley Authority	1	SERC
					Grant, Ian S.	Tennessee Valley Authority	3	SERC
					Thomas, M. Lee	Tennessee Valley Authority	5	SERC
					Parsons, Marjorie S.	Tennessee Valley Authority	6	SERC
Chris Carnesi	Chris Carnesi		WECC	NCPA	Marty Hostler	Northern California	4	WECC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						Power Agency		
					Dennis Sismaet	Northern California Power Agency	6	WECC
Santee Cooper	James Poston	3		Santee Cooper	Rodger Blakely	Santee Cooper	1,3,5,6	SERC
					Rene' Free	Santee Cooper	1,3,5,6	SERC
					Wanda Williams	Santee Cooper	1,3,5,6	SERC
					Bridget Coffman	Santee Cooper	1,3,5,6	SERC
					Bob Rhett	Santee Cooper	1,3,5,6	SERC
Jennie Wike	Jennie Wike		WECC	Tacoma Power	Jennie Wike	Tacoma Public Utilities	1,3,4,5,6	WECC
					John Merrell	Tacoma Public Utilities (Tacoma, WA)	1	WECC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Marc Donaldson	Tacoma Public Utilities (Tacoma, WA)	3	WECC
					Hien Ho	Tacoma Public Utilities (Tacoma, WA)	4	WECC
					Terry Gifford	Tacoma Public Utilities (Tacoma, WA)	6	WECC
					Ozan Ferrin	Tacoma Public Utilities (Tacoma, WA)	5	WECC
ACES Power Marketing	Jodirah Green	6	MRO,NA - Not Applicable,RF,SERC,Texas RE,WECC	ACES Standard Collaborations	Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1	SERC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Bill Hutchison	Southern Illinois Power Cooperative	1	SERC
					Susan Sosbe	Wabash Valley Power Association	3	RF
					Nick Fogleman	Prairie Power, Inc.	1	SERC
					Scott Brame	North Carolina Electric Membership Corporation	3,4,5	SERC
					Shari Heino	Brazos Electric Power Cooperative, Inc.	5	Texas RE
					Ryan Strom	Buckeye Power, Inc.	5	RF

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Colette Caudill	East Kentucky Power Cooperative	1,3	SERC
					Michael Brytowski	Great River Energy	3	MRO
					Kylee Kropp	Sunflower Electric Power Corporation	1	MRO
LaKenya VanNorman	LaKenya VanNorman		SERC	Florida Municipal Power Agency (FMPPA)	Chris Gowder	Florida Municipal Power Agency	5	SERC
					Dan O'Hagan	Florida Municipal Power Agency	4	SERC
					Carl Turner	Florida Municipal Power Agency	3	SERC
					Jade Bulitta	Florida Municipal	6	SERC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						Power Agency		
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Tricia Bynum	FirstEnergy - FirstEnergy Corporation	6	RF
					Mark Garza	FirstEnergy-FirstEnergy	4	RF
Public Utility District No. 1 of Chelan County	Meaghan Connell	5		PUD No. 1 of Chelan County	Joyce Gundry	Public Utility District No. 1 of Chelan County	3	WECC
					Diane Landry	Public Utility District No. 1 of Chelan County	1	WECC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Glen Pruitt	Public Utility District No. 1 of Chelan County	6	WECC
					Meaghan Connell	Public Utility District No. 1 Chelan County	5	WECC
Michael Johnson	Michael Johnson		WECC	PG&E All Segments	Marco Rios	Pacific Gas and Electric Company	1	WECC
					Sandra Ellis	Pacific Gas and Electric Company	3	WECC
					James Mearns	Pacific Gas and Electric Company	5	WECC
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama	3	SERC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						Power Company		
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
					Jim Howell	Southern Company - Southern Company Services, Inc. - Gen	5	SERC
DTE Energy	patricia ireland	4		DTE Energy	Patricia Ireland	DTE Energy - Detroit Edison	4	RF
					Karie Barczak	DTE Energy - Detroit Edison Company	3	RF
					Adrian Rducea	DTE Energy - Detroit Edison Company	5	RF

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Paul Haase	Paul Haase		WECC	Seattle City Light	Pawel Krupa	Seattle City Light	1	WECC
					Dana Wheelock	Seattle City Light	3	WECC
					Hao Li	Seattle City Light	4	WECC
					Mike Haynes	Seattle City Light	5	WECC
					Bud Freeman	Seattle City Light	6	WECC
					Paul Haase	Seattle City Light	1,3,4,5,6	WECC
					Ginette Lacasse	Seattle City Light	1,3,4,5,6	WECC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC Regional Standards Committee	Gerry Dunbar	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Glen Smith	Entergy Services	4	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Alan Adamson	New York State Reliability Council	7	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Harish Vijay Kumar	IESO	2	NPCC
					David Kiguel	Independent	7	NPCC
					Nick Kowalczyk	Orange and Rockland	1	NPCC
					Joel Charlebois	AESI - Acumen Engineered Solutions International Inc.	5	NPCC
					Mike Cooke	Ontario Power Generation, Inc.	4	NPCC
					Salvatore Spagnolo	New York Power Authority	1	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Shivaz Chopra	New York Power Authority	5	NPCC
					Deidre Altobell	Con Ed - Consolidated Edison	4	NPCC
					Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
					Cristhian Godoy	Con Ed - Consolidated Edison Co. of New York	6	NPCC
					Nurul Abser	NB Power Corporation	1	NPCC
					Randy MacDonald	NB Power Corporation	2	NPCC
					Michael Ridolfino	Central Hudson Gas and Electric	1	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Vijay Puran	NYSPS	6	NPCC
					ALAN ADAMSON	New York State Reliability Council	10	NPCC
					Sean Cavote	PSEG - Public Service Electric and Gas Co.	1	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					John Pearson	ISONE	2	NPCC
					Nicolas Turcotte	Hydro-Qu?bec TransEnergie	1	NPCC
					Chantal Mazza	Hydro-Quebec	2	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
Dominion - Dominion Resources, Inc.	Sean Bodkin	3,5,6		Dominion	Connie Lowe	Dominion - Dominion Resources, Inc.	3	NA - Not Applicable
					Lou Oberski	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable
					Larry Nash	Dominion - Dominion Virginia Power	1	NA - Not Applicable
					Rachel Snead	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable
Tim Kelley	Tim Kelley		WECC	SMUD / BANC	Nicole Looney	Sacramento Municipal Utility District	3	WECC
					Charles Norton	Sacramento Municipal	6	WECC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						Utility District		
					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Foung Mua	Sacramento Municipal Utility District	4	WECC
					Nicole Goi	Sacramento Municipal Utility District	5	WECC
					Kevin Smith	Balancing Authority of Northern California	1	WECC

1. Do you agree the updated language proposed in Attachment 1 Section 6 addresses the risk of malicious communication and vendor remote access to low impact BES cyber systems as directed by the [NERC Board resolution](#)? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6, Group Name Dominion

Answer No

Document Name

Comment

The introduction of “detecting known or suspected malicious communications” for low impact BES Cyber Systems would be more stringent as compared to CIP-005 R1.5 since Medium Impact BES Cyber Systems are not applicable in the current version of the standards without adding any additional reliability benefits.

Likes 4

Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; WEC Energy Group, Inc., 3, Kane Christine; Central Hudson Gas & Electric Corp., 1, Ridolfino Michael; Jones Barry On Behalf of: sean erickson, Western Area Power Administration, 1, 6;

Dislikes 0

Response

The SDT thanks you for your comment, please see summary response.

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer No

Document Name

Comment

As with the previous draft, Section 6.3 still creates a higher bar for some assets containing low impact BCS than for most medium impact BCS (i.e., those outside of control centers). Section 6.3 would require detection of malicious inbound and outbound communications for low impact BCS with vendor remote connectivity. In the current version and next effective version of CIP-005, Part 1.5 requires detection of malicious inbound and outbound communications only for medium impact BCS at Control Centers.

BPA recognizes that the NERC Board Resolution directs the drafting team to modify CIP-003 to “..include policies for low impact BES Cyber Systems to: (1) detect known or suspected malicious communications for both inbound and outbound communications...” BPA also acknowledges that the Technical Rationale attempts to identify more robust controls from CIP-005-6 that offset this inconsistency. However, this inconsistency results in a complicated and confusing compliance approach: entities will be required to develop separate evidence packages for Low and Medium (outside of control centers) substations even if they implement identical solutions across both.

Likes 4	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; Platte River Power Authority, 6, Martz Sabrina; Platte River Power Authority, 3, Kiess Wade; Wabash Valley Power Association, 3, Sosbe Susan
Dislikes 0	

Response

The SDT thanks you for your comment. The SDT understands your comment that having a difference between low (CIP-003-X) language and high/medium (CIP-005) language will create more and varied evidence for submission. The SDT agrees that this is possible, and is a necessary result due to the large number of entities with low-impact BES Cyber systems

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer	No
Document Name	

Comment

BC Hydro appreciates the opportunity to comment and thanks the drafting team for their continued efforts.

The language proposed in CIP-003-X attachment 1 Section 6 does not comprehensively address the risk of malicious communication and vendor remote access to low impact BES cyber systems with possible areas of improvement as follows:

- The language used in CIP-003-X attachment 1 Section 6.3 is referring to 'known or suspected malicious communications'. BC Hydro recommends adding more clarity and provide examples of use cases and applicability. Specifically, context and usage of the term 'malicious communication' needs more clarity and BC Hydro requests to provide the context and usage with pertinent examples and use case scenarios to improve understanding and to better scope the requirements.
- Similarly, BC Hydro proposes defining and adding term 'Vendor Electronic Remote Access' to NERC Glossary of Terms.
- Who and what is considered a 'Vendor' also need to be defined in the Glossary of Terms for clarity and understanding.

CIP-005-5 R1.5 does not apply to Medium impact BCS if they are not at Control Centers. Why and how the Requirement in Section 6.3 applies to 'Low Impact BCS' is not very clear from the language used. The Section 6.3 does offer possible mitigation of the risks i.e., 'malicious communication and vendor remote acces's however this is even more stringent on Low Impact BCS in comparison to CIP-005-5 R1.5.

BC Hydro recommends rewording or removing Section 6.3 completely.

Likes 1	Jones Barry On Behalf of: sean erickson, Western Area Power Administration, 1, 6;
Dislikes 0	

Response

The SDT thanks you for your comment.
 1st bullet: The drafting team specifically left open the definitions and specifics of terms that are not already in the NERC glossary. This should enable entities to define those risks internally and manage them appropriately

2nd and 3rd Bullet: One entity asked the SDT to add "Vendor Electronic Access" to the NERC glossary. The SDT decided that the follow-on effects of such an addition (ie: how would this affect other, existing NERC standards) is not within the scope of this SAR, nor is it beneficial to the security of the BES if NERC codifies such a definition.

Many entities commented that the draft language sets a higher standard of security for Low impact BES Cyber systems, than is set by CIP-005-7 which is only applicable to medium and high impact systems. The SDT respectfully disagrees. CIP-005-7 mandates many things including:

- documentation of EAPs
 - specific inbound and outbound permissions,
 - deny by default
 - Dial-up authentication
 - malicious detection of all connections, not just from vendors.
- None of the previous list is explicitly required by the SDT's or current language of CIP-003-X

James Poston - Santee Cooper - 3, Group Name Santee Cooper

Answer No

Document Name

Comment

Attachment 1 Section 6 was introduced as an objective risk-based requirement; however, it lists prescriptive actions. An entity can mitigate the risks associated with vendor electronic remote access through various means and still address disabling of vendor electric remote access, and malicious communication protection. As such the language should read more like an objective risk-based requirement allowing an entity to have a bit more leeway to comply with the requirements.

Likes 0

Dislikes 0

Response

Thank you for your comment. The SDT had a SAR that specifically required protection from vendors, and that inserting more protections would increase compliance cost dramatically. Attachment 1, Section six subsections are in line with the NERC Board resolution requirements outlined in the Revisions to CIP-003-8 for Low Impact BES Cyber Systems for Supply Chain Cyber Security SAR. Outside of requiring that entities develop and implement processes to mitigate common risks associated with vendor remote access (as outlined in the December 2019 NERC Supply Chain Risk Assessment report) the standard allows entities to determine the most appropriate method(s) to meet compliance. The SDT would like to reinforce the message that the examples included in Attachment 2 are not intended to dictate appropriate compliance evidence nor are they intended to limit an entity in determining what evidence they provide.

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Nierenberg, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer	No
Document Name	
Comment	
<p>Tacoma Power does not agree that the proposed language in Attachment 1, Section 6 addresses the risk of malicious communication. The Section 6 introduction includes an objective risk-based high-level requirement, yet prescriptive actions are listed in the sub-parts. An entity can mitigate the risks associated with vendor electronic remote access through various means and still address disabling of vendor electric remote access, and malicious communication protection.</p> <p>Tacoma Power suggests the following wording to avoid prescriptive language in the sub-parts (changes noted in italics and important word changes are highlighted with bold text):</p> <p>Section 6: Vendor Electronic Remote Access Security Controls: For assets containing low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible Entity shall implement a process to mitigate risks associated with vendor electronic remote access, where such access has been established under Section 3.1. These processes shall address:</p> <p><i>6.1 determining and disabling active vendor electronic remote access sessions, if applicable; and</i></p> <p><i>6.2 malicious communications.</i></p> <p>By altering the wording as shown above, an entity would be able to comply through multiple means and would not HAVE to implement a detection method to mitigate malicious communication. For example, if an Entity makes use of an Intermediate System for all low impact BCS remote access, which would mitigate the risk of vendor electronic remote access malicious communications, they have addressed malicious communications without having to also detect malicious communications, which in this scenario is extremely unlikely to occur.</p>	
Likes 3	Platte River Power Authority, 6, Martz Sabrina; Platte River Power Authority, 3, Kiess Wade; Public Utility District No. 1 of Snohomish County, 1, Rhoads Alyssia
Dislikes 0	

Response	
Thank you for your comment. The SDT feels that the current language is the best version that allows entities maximum flexibility for program design and follow-through.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	No
Document Name	
Comment	
<p>Texas RE continues to be concerned that the language in Attachment 1, Section 6 is limited to vendor remote access. Texas RE is concerned that Section 6’s focus on vendor remote access does not capture the full range of malicious communications contemplated under the low impact guidance documents. In the event of a supply chain attack, malicious communications can occur whether or not a Responsible Entity has established an authorized channel for vendor communications. Additionally, in the event of a supply chain attack, malicious communications can potentially be initiated from compromised Cyber Assets attempting to communicate with a Command and Control server. Importantly, these can occur along logical pathways for which where the Responsible Entity has deliberately not established channels for vendor remote access.</p> <p>A supply chain attack, such as the supply chain attack that resulted in the 2020 United States federal government data breach, is not typically conducted directly by compromised vendors themselves. These attacks are typically conducted by malicious third parties that do not have a formal business relationship with the vendor or the affected Registered Entity. As such, scoping this requirement to only address remote access that is conducted directly by vendors would deliberately exclude from scope the exact communications that need to be monitored.</p> <p>Based on this perspective, therefore, Texas RE recommends that the SDT clarify that CIP-003 low impact monitoring obligations extend to all inbound and outbound network traffic to mitigate the risk of suspicious or malicious traffic going unnoticed, not just in situations of authorized vendor remote access. Texas RE recommends moving the proposed language in Attachment 1, Section 6.2 to Section 3 (Electronic Access Controls) so it is clear malicious communication monitoring and detection method obligations apply to all communications, not simply vendor remote access communications.</p>	
Likes	0

Dislikes	0
Response	
<p>Thank you for your comment. The SDT agrees that our language does not capture all possible malicious situations at low impact BES Cyber Systems. We see this as outside the scope of our given SAR. Our SAR also instructed the SDT to write language for vendor threats. Given the nature (larger sample size, lower grid risk) we feel that the draft language is appropriate. The SDT believes that the security controls are comminerate with the risks for low impact.</p>	
Israel Perez - Salt River Project - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
<p>Since Section 6 has introduced an objective risk-based high-level requirement, yet prescriptive actions are listed. An entity can mitigate the risks associated with vendor electronic remote access through various means and still address disabling of vendor electric remote access, and malicious communication protection.</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your comment. The SDT had a SAR that specifically required protection from vendors, and that inserting more protections would increase compliance cost dramatically.Attachment 1, Section six subsections are in line with the NERC Board resolution requirements outlined in the Revisions to CIP-003-8 for Low Impact BES Cyber Systems for Supply Chain Cyber Security SAR. Outside of requiring that entities develop and implement processes to mitigate common risks associated with vendor remote access (as outlined in the December 2019 NERC Supply Chain Risk Assessment report) the standard allows entities to determine the most appropriate method(s) to meet compliance. The SDT would like to reinforce the message that the examples included in Attachment 2 are not intended to dictate appropriate compliance evidence nor are they intended to limit an entity in determining what evidence they provide.</p>	
Richard Jackson - U.S. Bureau of Reclamation - 1,5	

Answer	No
Document Name	
Comment	
<p>Reclamation recommends the SDT align the CIP-003 Attachment 1 Section 6 language with CIP-005-6 R2 and use NERC-defined terms where possible. The content of Section 6 should be included within Attachment 1 Section 3 and not made into a new section. Reclamation recommends adding “if technically feasible” to Section 6.2 to account for legacy systems that are not capable of detecting known or suspected malicious communications for both inbound and outbound communications.</p> <p>Reclamation recommends the following changes to Section 6:</p> <p>From:</p> <p>Vendor remote access: For assets containing low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible Entity shall implement a process to mitigate risks associated with vendor remote access (including interactive and system-to-system access) to low impact BES Cyber Systems that includes:</p> <ul style="list-style-type: none"> 6.1 Having one or more method(s) for determining vendor remote access sessions; 6.2 Having one or more method(s) for detecting known or suspected malicious communications for both inbound and outbound communications; and 6.3 Having one or more method(s) for disabling vendor remote access. <p>To:</p> <p>Vendor remote access: For assets containing low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible Entity shall implement a process to mitigate risks associated with active vendor remote access sessions (including Interactive Remote Access and system-to-system remote access) to low impact BES Cyber Systems that includes:</p> <ul style="list-style-type: none"> 6.1 Having one or more method(s) for identifying active vendor remote access sessions; 	

6.2 If technically feasible, have one or more method(s) for detecting known or suspected malicious communications for both inbound and outbound communications; and

6.3 Having one or more method(s) for disabling active vendor remote access.

The phrase “determining active vendor remote access sessions” is not clear. Reclamation recommends using the same language as in the Technical Rationale, which refers more specifically to “when sessions are initiated.”

Likes 0

Dislikes 0

Response

Thank you for your comment. The SDT feels that the current language is the best version that allows entities maximum flexibility for program design and follow-through.

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Fong Mua, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Goi, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; - Tim Kelley, Group Name SMUD / BANC

Answer

No

Document Name

Comment

SMUD and BANC support Tacoma Power's comment.

Likes 0

Dislikes 0

Response

Thank you for your comment, please see response to Tacoma Power.

Jesus Sammy Alcaraz - Imperial Irrigation District - 1

Answer	No
Document Name	
Comment	
<p>Section 6.3 still creates a higher bar for some assets containing low impact BCS than for most medium impact BCS (i.e., those outside of control centers). It is still not clear if VPN connections established with support vendors fully adheres to requirement or additional steps such as IDS/IPS are required. The Section 6 introduction includes an objective risk-based high-level requirement, yet prescriptive actions are listed in the sub-parts.</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your comments. A few entities mentioned VPNs (virtual private networks) and IDS/IPS (intrusion detection/prevention systems). The SDT does not see a difference between vendor remote communications over VPN vs non-VPN - we think that protections need to be in place in either scenario.</p> <p>An IDS/IPS may be used by an entity as part of its compliance program (note that IDS/IPS is listed as only one of the examples in Attachment 2 Section 6) but would require (as would any other device or system) a program that included statements and actions that would satisfy the mandates of Sections 6.1, .2 and .3. To expand on the example - if an entity wanted to use an IDS/IPS for CIP-003-X compliance, the applicable program would need to include how the system would disable vendor remote access when required (to satisfy section 6.2). The SDT had a SAR that specifically required protection from vendors, and that inserting more protections would increase compliance cost dramatically. Attachment 1, Section six subsections are in line with the NERC Board resolution requirements outlined in the Revisions to CIP-003-8 for Low Impact BES Cyber Systems for Supply Chain Cyber Security SAR. Outside of requiring that entities develop and implement processes to mitigate common risks associated with vendor remote access (as outlined in the December 2019 NERC Supply Chain Risk Assessment report) the standard allows entities to determine the most appropriate method(s) to meet compliance. The SDT would like to reinforce the message that the examples included in Attachment 2 are not intended to dictate appropriate compliance evidence nor are they intended to limit an entity in determining what evidence they provide.</p>	

Chris Carnesi - Chris Carnesi On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - Chris Carnesi, Group Name NCPA

Answer	No
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Document Name	
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Comment

NCPA does not agree with prescriptive language for 6.3 as it relates to detect known or suspected malicious communications. This would be more arduous for Low impact entities to implement compared to non-Control Center Medium Impact facilities as they don't need to comply with CIP-005 R1.5. This creates an imbalance of requiring lower risk facilities to comply with a more strenuous requirement than higher risk facilities. At least limiting 6.3's scope to only Low Impact Control Centers would be somewhat congruent with the CIP-005 R1.5 requirement.

Likes 0	
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Dislikes 0	
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Response

The SDT thanks you for your comment, please see summary response.

Carl Pineault - Hydro-Qu?bec Production - 1,5

Answer	No
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Document Name	
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Comment

Based on comments below, we conclude the proposed updates do not adequately address the risk of malicious communication and vendor remote access.

Likes 0	
---------	--

Dislikes 0	
------------	--

Response	
Thank you for your comment, please see responses to comments below.	
patricia ireland - DTE Energy - 4, Group Name DTE Energy	
Answer	No
Document Name	
Comment	
Malicious communication can arguably be effectively addressed with Attachment 1, requirements 6.1 and 6.2. We believe that Requirement 6.3 is excessive.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. The SDT feels that the current language is the best version that allows entities maximum flexibility for program design and follow-through.	
Brian Evans-Mongeon - Utility Services, Inc. - 4	
Answer	No
Document Name	
Comment	
It is not clear that Section 6.3 only applies to only inbound and outbound vendor communication and not all communication established under Section 3.1. If Section 6.3 is applicable to all communications then it should be moved to Section 3.1.	
Likes	0
Dislikes	0
Response	

Thank you for your comments. We see your comment that the latest draft language now includes non-vendors in the requirements of Section 6.3. The SDT respectfully disagrees - Section 6.3 is under the text of Section 6, which specifically asks entities to "mitigate risks associated with vendor remote access...". It was not the intent of the SDT to include non-vendor access in section 6.

Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5

Answer No

Document Name

Comment

Based on comments below, we conclude the proposed updates do not adequately address the risk of malicious communication and vendor remote access.

Likes 0

Dislikes 0

Response

Thank you for your comments. Please see response on your comments below.

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee

Answer No

Document Name

Comment

Based on the comments below, we conclude the proposed updates do not adequately address the risk of malicious communication and vendor remote access.

Likes 0

Dislikes 0

Response

Thank you for your comments. Please see response on your comments below.	
Russell Noble - Cowlitz County PUD - 3	
Answer	No
Document Name	
Comment	
See comments as supplied by Deanna Carlson from Cowlitz PUD.	
Likes	0
Dislikes	0
Response	
Thank you for your comment, please see response to Deanna Carlson.	
Deanna Carlson - Cowlitz County PUD - 5	
Answer	No
Document Name	
Comment	
Cowlitz PUD does not agree that the proposed language in Attachment 1, Section 6 addresses the risk of active malicious communications and is too prescriptive in the actions listed in Section 6.1 – 6.3. Entities can mitigate the risks associated with vendor electronic remote access through various means and still address the NERC Board Resolution to detect, determine, and disable active vendor electric remote access, and malicious communications. The language should read more like an objective risk-based requirement allowing an entity to have a bit more leeway to comply with the requirement. Additionally, as written Section 6.3 appears to be applicable to all communications and should then be removed from Section 6.3 and placed in Section 3.1 if this was the intent.	
Likes	0
Dislikes	0

Response

Thank you for your comment. The SDT had a SAR that specifically required protection from vendors, and that inserting more protections would increase compliance cost dramatically. Attachment 1, Section six subsections are in line with the NERC Board resolution requirements outlined in the Revisions to CIP-003-8 for Low Impact BES Cyber Systems for Supply Chain Cyber Security SAR. Outside of requiring that entities develop and implement processes to mitigate common risks associated with vendor remote access (as outlined in the December 2019 NERC Supply Chain Risk Assessment report) the standard allows entities to determine the most appropriate method(s) to meet compliance. The SDT would like to reinforce the message that the examples included in Attachment 2 are not intended to dictate appropriate compliance evidence nor are they intended to limit an entity in determining what evidence they provide.

Joe Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC

Answer

Yes

Document Name

Comment

Xcel Energy supports the comments of EEI and the MRO NSRF.

Likes 0

Dislikes 0

Response

The SDT thanks you for your comment, please see response to EEI And MRO NSRF.

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer

Yes

Document Name

Comment

Southern agrees that the proposed language in Attachment 1 Section 6 addresses the risk of malicious communication and vendor remote access to low impacce BES cyber systems as directed by the NERC Board resolution.

Likes	0
Dislikes	0
Response	
The SDT thanks you for your comments.	
Michael Johnson - Michael Johnson On Behalf of: Ed Hanson, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees the updated language in Attachment 1, Section 6 addresses the risks noted by the NERC Board of Trustees resolution.	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comments.	
Justin Welty - NextEra Energy - Florida Power and Light Co. - 6	
Answer	Yes
Document Name	
Comment	
NextEra Energy supports EEI’s comment: EEI agrees that the updated language proposed in Draft 3 of Attachment 1 Section 6 addresses the risk of malicious communication and vendor remote access to low impact BES cyber systems as directed by the NERC Board resolution	
Likes	0
Dislikes	0

Response	
The SDT thanks you for your comment, please see response to EEI.	
Kimberly Turco - Constellation – 6	
Answer	Yes
Document Name	
Comment	
Yes, Constellation agrees the the updated language addresses the risk of malicious communication and vendor remote access to low impact BES cyber systems.	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comments.	
Alison Mackellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Yes, Constellation agrees the the updated language addresses the risk of malicious communication and vendor remote access to low impact BES cyber systems.	
Kimberly Turco on behalf of Constellation Segements 5 and 6	
Likes	0

Dislikes	0
Response	
The SDT thanks you for your comments.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #1.	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment, please see response to EEI.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Minnesota Power is in agreement with EEI's comments.	
Likes	0
Dislikes	0
Response	

The SDT thanks you for your comment, please see response to EEI.	
Clay Walker - Clay Walker On Behalf of: John Lindsey, Cleco Corporation, 6, 5, 1, 3; Maurice Paulk, Cleco Corporation, 6, 5, 1, 3; Robert Hirschak, Cleco Corporation, 6, 5, 1, 3; - Clay Walker	
Answer	Yes
Document Name	
Comment	
Cleco agrees with EEI comments.	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment, please see response to EEI.	
Jodirah Green - ACES Power Marketing - 6, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
<p>While the language added to the standard does meet the NERC Board resolution, we still strongly disagree with adding malicious code detections for low impact BCS (specifically Section 6.3) as this control is not a requirement for medium impact BCS (not at Control Centers). Although these new requirements come from the FERC/NERC resolution, there are much greater risks to the overall BES/BPS, at medium impact BCS than low impact BCS. We feel the only resolution to this, is to add the same controls to medium impact BCS or drop the requirement for low impact. If we as an ERO are taking a risk based approach and the FERC/NERC resolution into consideration, then adding the requirement to medium impact BCS is the only possible resolution to satisfy us and the FERC/NERC resolution. Based on our research there is not a resolution to add malicious code detections to medium impact BCS and therefore we will not be in favor of the controls for low impact.</p>	

Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment please see summary response.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI agrees that the updated language proposed in Draft 3 of Attachment 1 Section 6 addresses the risk of malicious communication and vendor remote access to low impact BES cyber systems as directed by the NERC Board resolution .	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon is aligning with EEI in response to this question.	
Likes	0
Dislikes	0

Response	
The SDT thanks you for your comment, please see response to EEI.	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon is aligning with EEI in response to this question.	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment, please see response to EEI.	
Benjamin Winslett - Georgia System Operations Corporation - 4	
Answer	Yes
Document Name	2020-03_Supply_Chain_Lows_Unofficial_Comment_Form (GSOC FINAL).docx
Comment	
<p>GSOC believes the updated language in section 6 addresses the risk; however modifications to section 6.3 introduce confusion regarding the scope of the requirement over the last posting by arguably including non-vendor related communications in the language. This broadening of language could be read to include asset-level monitoring of all inbound and outbound communication for known or suspected malicious communications is a significant departure from the previous draft and would result in an unduly burdensome compliance mandate. The Technical Rationale developed by the SDT states that section 6.3 “is scoped to focus only on vendors’ communications per the NERC Board resolution and the supply chain report.” However, the SDT has removed the language from 6.3 that clarifies this scope. Since the SDT moved the language that states “where such access has been established under Section 3.1” to the main part of Section 6, this language could be read as requiring this detection to occur at the point where access is established under Section 3.1 which defines that access at each asset containing low impact assets. Further, 6.3 could be read to require all malicious</p>	

communications to be detected, regardless of whether it is vendor communication or not as there is no reference to vendor communication in the control specified in section 6.3.

GSOC respectfully proposes the following wording that reverts the language in 6.3 to the language of the prior posting:

Vendor Electronic Remote Access Security Controls: For assets containing low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible Entity shall implement a process to mitigate risks associated with vendor electronic remote access, where such access has been established under Section 3.1.

These processes shall include:

- 6.1 One or more method(s) for determining vendor electronic remote access;
- 6.2 One or more method(s) for disabling vendor electronic remote access; and
- 6.3 One or more method(s) for detecting known or suspected malicious communications for both inbound and outbound vendor communications.

Likes	0
Dislikes	0

Response

Thank you for your comment. The SDT sees that your comment in the latest draft language now includes non-vendors in the requirements of Section 6.3. The SDT respectfully disagrees - Section 6.3 is under the text of Section 6, which specifically asks entities to "mitigate risks associated with vendor remote access....". It was not the intent of the SDT to include non-vendor access in section 6.

Gail Elliott - International Transmission Company Holdings Corporation - NA - Not Applicable - MRO,RF	
Answer	Yes
Document Name	
Comment	
ITC is in agreement with the EEI response	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment, please see response to EEI.	
Kenya Streeter - Edison International - Southern California Edison Company - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
See comments submitted by the Edison Electric Institute	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment, please see response to EEI.	
Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nicholas Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Eric Sutlief - CMS Energy - Consumers Energy Company - 3,4,5 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Martin Sidor - NRG - NRG Energy, Inc. - 6	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Lan Nguyen - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	

Meaghan Connell - Public Utility District No. 1 of Chelan County - 5, Group Name PUD No. 1 of Chelan County	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Erik Gustafson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Claudine Bates - Black Hills Corporation - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Sheila Suurmeier - Black Hills Corporation - 1,3,5,6	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Micah Runner - Black Hills Corporation - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Ron Wilgers - Black Hills Corporation - 3 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for your support.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; - MEAG Power - 1 - SERC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jennifer Buckman - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
JT Kuehne - AEP - 6	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Michelle Amarantos - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Steven Rueckert - Western Electricity Coordinating Council - 10	
Answer	Yes
Document Name	

Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Gail Golden - Entergy - Entergy Services, Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Thank you for your support.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Dania Colon - Orlando Utilities Commission - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Teresa Krabe - Lower Colorado River Authority - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Megan Caulson - Megan Caulson On Behalf of: Jennifer Wright, Sempra - San Diego Gas and Electric, 5, 3, 1; - Megan Caulson	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
David Jendras - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
James Baldwin - Lower Colorado River Authority - 1	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Mark Ciufo - Mark Ciufo On Behalf of: Payam Farahbakhsh, Hydro One Networks, Inc., 3, 1; - Mark Ciufo	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Barry Jones - Barry Jones On Behalf of: sean erickson, Western Area Power Administration, 1, 6; - Barry Jones	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LaKenya VanNorman - LaKenya VanNorman On Behalf of: Chris Gowder, Florida Municipal Power Agency, 5, 3, 4, 6; Richard Montgomery, Florida Municipal Power Agency, 5, 3, 4, 6; - LaKenya VanNorman, Group Name Florida Municipal Power Agency (FMPPA)	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Paul Haase - Paul Haase On Behalf of: Hao Li, Seattle City Light, 4, 5, 3, 6, 1; - Paul Haase, Group Name Seattle City Light	
Answer	
Document Name	
Comment	

Seattle City Light abstains	
Likes	0
Dislikes	0
Response	
Thank you for your comment.	

2. The team has added clarifying language to limit the scope of this access to remote access that is conducted by vendors. Do you believe that this language is clear? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Deanna Carlson - Cowlitz County PUD - 5

Answer No

Document Name

Comment

Cowlitz PUD would like to see the terms ‘vendor electronic remote access’; added to Section 6.3 as it is included in Section 6.1 and 6.2. By excluding this from Section 6.3 an interpretation could be applied to malicious communications more broadly than as was intended.

Likes 0

Dislikes 0

Response

Thank you for your comment, the team has made this clarifying change.

Russell Noble - Cowlitz County PUD - 3

Answer No

Document Name

Comment

See comments as supplied by Deanna Carlson from Cowlitz PUD.

Likes 0

Dislikes 0

Response	
Please see response to Deanna Carlson	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee	
Answer	No
Document Name	
Comment	
<p>The CIP Standards use many terms:</p> <p>Vendor electronic remote access (proposed CIP-003)</p> <p>Inbound and outbound electronic access (CIP-003, Section 3)</p> <p>User-initiated interactive access (CIP-003 Reference Model 5)</p> <p>Indirect access (CIP-003 Reference Models 6 and 9)</p> <p>Suggest using an existing term OR request clarification of the “vendor electronic remote access” term - what is the purpose of electronic? What is remote?</p>	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see the summary response regarding definitions.	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5	
Answer	No
Document Name	
Comment	

The CIP Standards use many terms such as: Vendor electronic remote access (proposed CIP-003), Inbound and outbound electronic access (CIP-003, Section 3), User-initiated interactive access (CIP-003 Reference Model 5), Indirect access (CIP-003 Reference Models 6 and 9). Suggest using an existing term OR request clarification of the “vendor electronic remote access” term - what is the purpose of electronic? What is remote?

Likes 0

Dislikes 0

Response

Thank you for your comment. Please see the summary response regarding definitions.

Benjamin Winslett - Georgia System Operations Corporation - 4

Answer

No

Document Name

Comment

GSOC believes the updated language in section 6, specifically section 6.3 does not clarify the scope of the requirement. The language that provided that clear scoping was removed in this posting. Section 6.3 could now be read to require all malicious communications to be detected, regardless of whether it is vendor communication or not as there is no reference to vendor communication in the control specified in section 6.3. GSOC respectfully proposes the following wording which reverts the language in 6.3 to that of the prior posting:

Vendor Electronic Remote Access Security Controls: For assets containing

low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible

Entity shall implement a process to mitigate risks associated with vendor electronic remote access, where such access has been established under Section 3.1.

These processes shall include:

6.1 One or more method(s) for determining vendor electronic remote access;

6.2 One or more method(s) for disabling vendor electronic remote access; and

6.3 One or more method(s) for detecting known or suspected malicious communications for both inbound and outbound vendor communications.

Likes 0

Dislikes 0

Response

Thank you for your comment. The team has made clarifying changes to the language.

David Jendras - Ameren - Ameren Services - 3

Answer

No

Document Name

Comment

Ameren believes the term vendor needs to be more defined more clearly. Does the vendor role make a difference (contractor operators, support, etc.)? Is operations different from support in terms of vendors?

Likes 0

Dislikes 0

Response

The SDT thanks you for your comment, please see summary response.

Brian Evans-Mongeon - Utility Services, Inc. - 4

Answer	No
Document Name	
Comment	
<p>The second paragraph of Attachment 1 states “Responsible Entities with multiple-impact BES Cyber Systems ratings can utilize policies, procedures, and processes for their high or medium impact BES Cyber Systems to fulfill the sections for the development of low impact cyber security plan(s).” It is unclear how this statement can be applied without clarification on how the terms used in CIP-005-7 relate to the proposed terms in CIP-003-x. Request clarification on how the CIP-003-X term “vendor electronic remote access” relates to the CIP-005-7 terms “active vendor remote access” (R2) and “vendor-initiated remote connections”(R3).</p> <p>The CIP Standards use many terms:</p> <ul style="list-style-type: none"> · Vendor electronic remote access (proposed CIP-003) · Inbound and outbound electronic access (CIP-003, Section 3) · User-initiated interactive access (CIP-003 Reference Model 5) · Indirect access (CIP-003 Reference Models 6 and 9) <p>Suggest using an existing term OR request clarification of the “vendor electronic remote access” term - what is the purpose of electronic? What is remote?</p>	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment, please see summary response.	
patricia ireland - DTE Energy - 4, Group Name DTE Energy	
Answer	No
Document Name	

Comment

Please define if “Vendor Electronic Remote Access” is only for Interactive Access or does it include system to system access as well.

Likes 0

Dislikes 0

Response

The team believes vendor electronic remote access is all access conducted by a vendor.

Carl Pineault - Hydro-Qu?bec Production - 1,5

Answer

No

Document Name

Comment

The CIP Standards use many terms:

- {C}· Vendor electronic remote access (proposed CIP-003)
- {C}· Inbound and outbound electronic access (CIP-003, Section 3)
- {C}· User-initiated interactive access (CIP-003 Reference Model 5)
- {C}· Indirect access (CIP-003 Reference Models 6 and 9)

Suggest using an existing term OR request clarification of the “vendor electronic remote access” term - what is the purpose of electronic? What is remote?

Likes 0

Dislikes 0

Response

Thank you for your comment. Please see the summary response regarding definitions.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Fong Mua, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Goi, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; - Tim Kelley, Group Name SMUD / BANC	
Answer	No
Document Name	
Comment	
SMUD and BANC support Tacoma Power's comment.	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1,5	
Answer	No
Document Name	
Comment	
Reclamation recommends adding "Vendor" to the NERC Glossary of Terms and proposes the following definition:	
Vendor - Persons, companies, or other organizations with whom the Responsible Entity, or its affiliates, contracts to supply equipment for BES Cyber Systems and related services. Vendor does not include other NERC-registered entities that provide reliability services (e.g., Balancing Authority or Reliability Coordinator services pursuant to NERC Reliability Standards). Vendor may include: (i) developers or manufacturers of information systems, system components, or information system services; (ii) product resellers; or (iii) system integrators.	

Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment, please see summary response.	
Israel Perez - Salt River Project - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
While the high-level Section 6 introduction includes scoping language, the wording of the sub-parts 6.1 & 6.2 include the same vendor electronic remote access language, while 6.3 does not. Sub-part 6.3 may be construed to apply more broadly due to the omission of the scoping language in this sub-part, because the other sub-parts include this scoping language. PGS recommends including the language “vendor remote access”.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. The team has made clarifying changes to the language.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; - MEAG Power - 1 - SERC	
Answer	No
Document Name	
Comment	
Sections 6.1 and 6.2 use the terms ‘vendor electronic remote access’; however, Section 6.3 does not use this language which could lead to confusion for utilities. Even though the high level Section 6 limits the scope to remote access conducted by vendors, Section 6.3, without	

having the same language as Sections 6.1 and 6.2, could be interpreted to apply to malicious communications more broadly and not just for vendor electronic remote access.

Suggested language: In Section 6.3, instead of saying “One or more method(s) for detecting known or suspected inbound and outbound malicious communications,” the suggested language is as follows: “One or more method(s) for addressing and mitigating known or suspected inbound and outbound malicious communications for vendor electronic remote access”

Likes	0
Dislikes	0

Response

Thank you for your comment. The team has made clarifying changes to the language.

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Nierenberg, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer	No
Document Name	

Comment

While the high-level Section 6 introduction includes scoping language, the wording of the sub-parts 6.1 and 6.2 include the same vendor electronic remote access language, while 6.3 does not. Sub-part 6.3 may be construed to apply more broadly due to the omission of the scoping language in this sub-part, because the other sub-parts include this scoping language. Tacoma Power recommends including the “vendor remote access” language to the sub-part 6.3 sentence, in accordance with the the following Westlaw reference:
[https://content.next.westlaw.com/practical-law/document/lbe943df6e1e711e698dc8b09b4f043e0/Expressio-unius-est-exclusio-alterius?viewType=FullText&transitionType=Default&contextData=\(sc.Default\)&firstPage=true](https://content.next.westlaw.com/practical-law/document/lbe943df6e1e711e698dc8b09b4f043e0/Expressio-unius-est-exclusio-alterius?viewType=FullText&transitionType=Default&contextData=(sc.Default)&firstPage=true)

Likes	2	Platte River Power Authority, 3, Kiess Wade; Public Utility District No. 1 of Snohomish County, 1, Rhoads Alyssia
Dislikes	0	

Response	
Thank you for your comment. The team has made clarifying changes to the language.	
James Poston - Santee Cooper - 3, Group Name Santee Cooper	
Answer	No
Document Name	
Comment	
The term “vendor” needs to be defined in the NERC glossary of terms. The use of the term “vendor” in the CIP-013 Supplemental Material is not an official definition. This term is crucial to CIP-013 and with the proposed changes to CIP-003 the term will be crucial in determining what is considered vendor remote access.	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment, please see summary response.	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	No
Document Name	
Comment	
As mentioned in comments related to Question 1 above, 'vendor electronic remote access' needs clarity of understanding and clear definitions of the terms for appropriate applicability as well as the use of term 'Vendor' e.g., whether a consultant using same infrastructure is considered vendor.	
Likes 0	
Dislikes 0	

Response	
The SDT thanks you for your comment, please see summary response.	
Kenya Streeter - Edison International - Southern California Edison Company - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
See comments submitted by the Edison Electric Institute	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment, please see response to EEI.	
LaKenya VanNorman - LaKenya VanNorman On Behalf of: Chris Gowder, Florida Municipal Power Agency, 5, 3, 4, 6; Richard Montgomery, Florida Municipal Power Agency, 5, 3, 4, 6; - LaKenya VanNorman, Group Name Florida Municipal Power Agency (FMPA)	
Answer	Yes
Document Name	
Comment	
<p>We appreciate the time and attention the SDT put forth working on this section, however we are concerned that the language under 6.3 does not include a direct reference to “vendor remote access” in the sub part. We understand the SDT debated this issue, however we recommend modification to the language to improve clarity. We believe these clarifications can be made without substantial change, so are thereby voting affirmative with the desire for futher clarification. These are possible improvements to the language:</p> <p>1) Adding clarity to the last sentence of section 6:</p>	

"These vendor electronic remote access processes shall include:" By adding "vendor electronic remote access", it helps clarify the intent of all three sub-sections being applicable to just "vendor electronic remote access" and not all communications. While technically the word "these" refers to the previous sentence, we feel there could be more clarity to assist Responsible Entities to focus on the subject of the revisions.

2) Remove references to “vendor remote access” in 6.1 and 6.2

3) Modifying 6.3 to include a reference to vendor electronic remote access. If 6.3 were modified, we recommend it to read:

“6.3 One or more method(s) for detecting known or suspected inbound and outbound malicious communications associated with vendor electronic remote access.”

Likes 0

Dislikes 0

Response

Thank you for your comment. The team has made clarifying changes to the language.

Gail Elliott - International Transmission Company Holdings Corporation - NA - Not Applicable - MRO,RF

Answer

Yes

Document Name

Comment

ITC is in agreement with the EEI response

Likes 0

Dislikes 0

Response

The SDT thanks you for your comment, please see response to EEI.

Kinte Whitehead - Exelon - 3

Answer	Yes
Document Name	
Comment	
Exelon is aligning with EEI in response to this question.	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment, please see response to EEI.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon is aligning with EEI in response to this question.	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment, please see response to EEI.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	

EEI supports the Draft 3 language believing that it is sufficiently clear to limit the scope for remote access to low impact BES cyber systems.

Likes 0

Dislikes 0

Response

The SDT thanks you for your comment.

Dania Colon - Orlando Utilities Commission - 5

Answer Yes

Document Name

Comment

We appreciate the time and attention the SDT put forth working on this section, however we are concerned that the language under 6.3 does not include a direct reference to “vendor remote access” in the sub part. We understand the SDT debated this issue, however we recommend modification to the language to improve clarity. We believe these clarifications can be made without substantial change, so are thereby voting affirmative with the desire for futher clarification. These are possible improvements to the language:

1) Adding clarity to the last sentence of section 6:

"These vendor remote access processes shall include:" By adding "vendor remote access", it helps clarify the intent of all three sub-sections being applicable to just "vendor remote access" and not all communications. While technically the word "these" refers to the previous sentence, we feel there could be more calrity to assist Responsisble Entities to focus on the subject of the revisions.

2) Remove references to “vendor remote access” in 6.1 and 6.2

3) Modifying 6.3 to include a reference to vendor remote access. If 6.3 were modified, we recommend it to read:

“6.3 One or more method(s) for detecting known or suspected inbound and outbound malicious communications associated with vendor remote access.”

Likes	0
Dislikes	0
Response	
Thank you for your comment. The team has made clarifying changes to the language.	
Clay Walker - Clay Walker On Behalf of: John Lindsey, Cleco Corporation, 6, 5, 1, 3; Maurice Paulk, Cleco Corporation, 6, 5, 1, 3; Robert Hirschak, Cleco Corporation, 6, 5, 1, 3; - Clay Walker	
Answer	Yes
Document Name	
Comment	
Cleco agrees with EEI comments.	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment, please see response to EEI.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Minnesota Power is in agreement with EEI's comments.	
Likes	0
Dislikes	0

Response	
The SDT thanks you for your comment, please see response to EEI.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
I believe the language is clear however the level of monitoring is not reduced.	
Likes	0
Dislikes	0
Response	
Thank you for your comment.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #2.	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment, please see response to EEI.	

Alison Mackellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Yes, Constellation believes that the language is clear.	
Kimberly Turco on behalf of Constellation Segements 5 and 6	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment.	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Yes, Constellation believes that the language is clear.	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment.	
Justin Welty - NextEra Energy - Florida Power and Light Co. - 6	

Answer	Yes
Document Name	
Comment	
NextEra Energy supports EEI's comment: EEI supports the Draft 3 language believing that it is sufficiently clear to limit the scope for remote access to low impact BES cyber systems.	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment, please see response to EEI.	
Michael Johnson - Michael Johnson On Behalf of: Ed Hanson, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees the language is clear that remote access is only for vendors.	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	

Comment	
I believe the language is clear however the level of monitoring is not reduced.	
Likes	0
Dislikes	0
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Southern believes the language added is clear to limit the scop of remote access conducted by vendors.	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment.	
Joe Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
Xcel Energy supports the comments of EEI and the MRO NSRF.	
Likes	0

Dislikes	0
Response	
The SDT thanks you for your comment, please see response to EEI and MRO NSRF.	
Barry Jones - Barry Jones On Behalf of: sean erickson, Western Area Power Administration, 1, 6; - Barry Jones	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Mark Ciufio - Mark Ciufio On Behalf of: Payam Farahbakhsh, Hydro One Networks, Inc., 3, 1; - Mark Ciufio	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
James Baldwin - Lower Colorado River Authority - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Megan Caulson - Megan Caulson On Behalf of: Jennifer Wright, Sempra - San Diego Gas and Electric, 5, 3, 1; - Megan Caulson	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Teresa Krabe - Lower Colorado River Authority - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jodirah Green - ACES Power Marketing - 6, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Chris Carnesi - Chris Carnesi On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - Chris Carnesi, Group Name NCPA	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Steven Rueckert - Western Electricity Coordinating Council - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Michelle Amarantos - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
JT Kuehne - AEP - 6	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jennifer Buckman - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Ron Wilgers - Black Hills Corporation - 3 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Micah Runner - Black Hills Corporation - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sheila Suurmeier - Black Hills Corporation - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Claudine Bates - Black Hills Corporation - 1,3,5,6	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Erik Gustafson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Meaghan Connell - Public Utility District No. 1 of Chelan County - 5, Group Name PUD No. 1 of Chelan County	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Lan Nguyen - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for your support.	
Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Martin Sidor - NRG - NRG Energy, Inc. - 6	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Eric Sutlief - CMS Energy - Consumers Energy Company - 3,4,5 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nicholas Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Paul Haase - Paul Haase On Behalf of: Hao Li, Seattle City Light, 4, 5, 3, 6, 1; - Paul Haase, Group Name Seattle City Light	
Answer	
Document Name	

Comment	
Seattle City Light abstains	
Likes	0
Dislikes	0
Response	
Thank youf for your comment.	
Gail Golden - Entergy - Entergy Services, Inc. - 5	
Answer	
Document Name	
Comment	
The technical rationale explains that Section 6.3 is specific to vendor only communication. It would aid the reader's understanding if this is clarified in the actual CIP-003-X standard language.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. The team has made clarifying changes to the language.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	

As noted in its response to Question 1 above, Texas RE continues to believe that the low-impact standards being developed should not be limited solely to vendor communications. However, if the SDT elects to limit the focus of these requirements solely to vendor communications, Texas RE notes that because the SAR specifically states that CIP-003-8 should be revised to include policies for low impact BES Cyber Systems at locations that allow vendor remote access, Texas RE recommends including “at locations that allow vendor remote access” in Section 6 as well.

Likes 0

Dislikes 0

Response

Thank you for your comment. The team has made clarifying changes to the language.

3. Has the SDT clarified that Attachment 1 Section 6 only addresses vendor’s access to low impact assets containing BES cyber systems from remote locations? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer No

Document Name

Comment

The use of word "Remote" will need some clarification and perhaps a definition in the defined terms, e.g., how the "Remote" term will be used in the sample scenarios below:

- 1) On site, but electronically remote (i.e. has to go through EAP despite being at the station).
- 2) A "vendor" at the work location of Responsible Entity, also electronically remote (i.e. going through EAP).
- 3) "Traditionally" remote, off site, and electronically remote (also going through EAP).

Likes 0

Dislikes 0

Response

Thank you for your comments. The standard drafting team has taken these comments into consideration and In an effort to develop requirements which meet a vast array of organizations, technologies, processes and operations, the SDT chose language which allows entities to identify and develop a process(es) regarding when and how vendors achieve access.

Claudine Bates - Black Hills Corporation - 1,3,5,6

Answer No

Document Name

Comment

The language says “electronic remote access” it does not state “remote locations,” which is appropriate based on the guidance given for CIP-005, which made it clear that “remote access” may include access originating from a desk in your corporate office. The geographic location of the vendor shouldn’t matter, only the method used to access the BCS.

Likes 0

Dislikes 0

Response

Thank you for your comments. The standard drafting team has taken these comments into consideration and In an effort to develop requirements which meet a vast array of organizations, technologies, processes and operations, the SDT chose language which allows entities to identify and develop a process(es) regarding when and how vendors achieve access.

Sheila Suurmeier - Black Hills Corporation - 1,3,5,6

Answer

No

Document Name

Comment

The language says “electronic remote access” it does not state “remote locations,” which is appropriate based on the guidance given for CIP-005, which made it clear that “remote access” may include access originating from a desk in your corporate office. The geographic location of the vendor shouldn’t matter, only the method used to access the BCS.

Likes 0

Dislikes 0

Response

Thank you for your comments. The standard drafting team has taken these comments into consideration and In an effort to develop requirements which meet a vast array of organizations, technologies, processes and operations, the SDT chose language which allows entities to identify and develop a process(es) regarding when and how vendors achieve access.

Micah Runner - Black Hills Corporation - 1,3,5,6

Answer	No
Document Name	
Comment	
<p>The language says “electronic remote access” it does not state “remote locations,” which is appropriate based on the guidance given for CIP-005, which made it clear that “remote access” may include access originating from a desk in your corporate office. The geographic location of the vendor shouldn’t matter, only the method used to access the BCS.</p>	
Likes 0	
Dislikes 0	
Response	
<p>Thank you for your comments. The standard drafting team has taken these comments into consideration and In an effort to develop requirements which meet a vast array of organizations, technologies, processes and operations, the SDT chose language which allows entities to identify and develop a process(es) regarding when and how vendors achieve access.</p>	
Ron Wilgers - Black Hills Corporation - 3 - WECC	
Answer	No
Document Name	
Comment	
<p>The language says “electronic remote access” it does not state “remote locations,” which is appropriate based on the guidance given for CIP-005, which made it clear that “remote access” may include access originating from a desk in your corporate office. The geographic location of the vendor shouldn’t matter, only the method used to access the BCS.</p>	
Likes 0	
Dislikes 0	
Response	

Thank you for your comments. The standard drafting team has taken these comments into consideration and In an effort to develop requirements which meet a vast array of organizations, technologies, processes and operations, the SDT chose language which allows entities to identify and develop a process(es) regarding when and how vendors achieve access.

Richard Jackson - U.S. Bureau of Reclamation - 1,5

Answer No

Document Name

Comment

Access from remote locations is not the same as remote access. A vendor could be physically on site and connect to the system through a remote connection.

Likes 0

Dislikes 0

Response

Thank you for your comments. The SDT discussed on-prem and off-prem vendors and their methods of access and took this into consideration. In an effort to develop requirements which meet a vast array of organizations, technologies, processes and operations, the SDT chose language which allows entities to identify and develop a process(es) regarding when and how vendors achieve access.

Carl Pineault - Hydro-Qu?bec Production - 1,5

Answer No

Document Name

Comment

Request clarification on why Attachment 1, 6.3 does not use the phrase “vendor electronic remote access” while Section 6 and, 6.1 and 6.2 use this phrase. While in the parent language, we request consistency among 6.1, 6.2 and 6.3.

Request confirmation that the SDT expects all of Attachment 1, Section 3.1 to be in place before Section 6 requirements. If Section 3.1 is not met, then Section 6 does not apply.

Likes	0
Dislikes	0
Response	
<p>Thank you for your comments. The standard drafting team considered specific language regarding vendor, electronic, remote, access, etc., as well as comments and suggestions from other entities. Please see our general comments regarding the Section 3 and Section 6, which is applicable to vendor remote access, which should clarify the discussion of requirements language choices. The SDT determined to focus on language which allows entities to define and determine their specific process(es) for vendor remote access.</p>	
Benjamin Winslett - Georgia System Operations Corporation - 4	
Answer	No
Document Name	
Comment	
<p>GSOC believes the updated language in section 6, specifically section 6.3 does not specifically limit the scope of the requirement to vendor access and communications. GSOC respectfully proposes the following wording:</p> <p>Vendor Electronic Remote Access Security Controls: For assets containing</p> <p>low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible</p> <p>Entity shall implement a process to mitigate risks associated with vendor electronic remote access, where such access has been established under Section 3.1.</p> <p>These processes shall include:</p> <p>6.1 One or more method(s) for determining vendor electronic remote access;</p> <p>6.2 One or more method(s) for disabling vendor electronic remote</p>	

access; and

6.3 One or more method(s) for detecting known or suspected malicious communications for both inbound and outbound vendor communications.

Likes 0

Dislikes 0

Response

Thank you for your comments. The standard drafting team has taken these comments into consideration and In an effort to develop requirements which meet a vast array of organizations, technologies, processes and operations, the SDT chose language which allows entities to identify and develop a process(es) regarding when and how vendors achieve access.

Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5

Answer

No

Document Name

Comment

Request clarification on why Attachement 1, 6.3 does not use the phrase "vendor electronic remote access" while Section 6 and, 6.1 use this phrase. While in the parent language, we request consistency among 6.1, 6.2 and 6.3.

Request confirmation that the SDE expects all of Attachement 1, Section 3.1 to be in place before Section 6 requirements. If section 3.1 is not met, then Section 6 does not apply.

Likes 0

Dislikes 0

Response

Thank you for your comments. The standard drafting team considered specific language regarding vendor, electronic, remote, access, etc., as well as comments and suggestions from other entities. Please see our general comments regarding the Section 3 and Section 6,

which is applicable to vendor remote access, which should clarify the discussion of requirements language choices. The SDT determined to focus on language which allows entities to define and determine their specific process(es) for vendor remote access.

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee

Answer No

Document Name

Comment

Request clarification on why Attachment 1, 6.3 does not use the phrase “vendor electronic remote access” while Section 6 and, 6.1 and 6.2 use this phrase. While in the parent language, we request consistency among 6.1, 6.2, and 6.3.

Request confirmation that the SDT expects all of Attachment 1, Section 3.1 to be in place before Section 6 requirements. If Section 3.1 is not met, then Section 6 does not apply.

Likes 0

Dislikes 0

Response

Thank you for your response. Please see the summary comments regarding language. The standard drafting team has taken these comments into consideration and In an effort to develop requirements which meet a vast array of organizations, technologies, processes and operations, the SDT chose language which allows entities to identify and develop a process(es) regarding when and how vendors achieve access.

Russell Noble - Cowlitz County PUD - 3

Answer No

Document Name

Comment

See comments as supplied by Deanna Carlson from Cowlitz PUD.

Likes	0
Dislikes	0
Response	
Thank you for your comment, please see response to Deanna Carlson.	
Deanna Carlson - Cowlitz County PUD - 5	
Answer	No
Document Name	
Comment	
The language says, “electronic remote access” it does not state “remote locations,” which is appropriate based on the guidance given for CIP-005, which made it clear that “remote access” may include access originating from a desk in your corporate office. The geographic location of the vendor shouldn’t matter, only the method used to access the BCS.	
Likes	0
Dislikes	0
Response	
Thank you for your comments. The standard drafting team has taken these comments into consideration and In an effort to develop requirements which meet a vast array of organizations, technologies, processes and operations, the SDT chose language which allows entities to identify and develop a process(es) regarding when and how vendors achieve access.	
Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	

<p>The language in Section 6, ‘where such access has been established under Section 3.1’ implies the entity is not required to implement a process to ‘mitigate risks associated with vendor electronic remote access’ unless remote access has been (or will be) established. We believe this is appropriate, where entities have opted to categorically deny all electronic remote access to vendors.</p>	
Likes	0
Dislikes	0
Response	
<p>The SDT thanks you for your comment.</p>	
<p>Joe Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC</p>	
Answer	Yes
Document Name	
Comment	
<p>Xcel Energy supports the comments of EEI and the MRO NSRF.</p>	
Likes	0
Dislikes	0
Response	
<p>The SDT thanks you for your comment, please see response to EEI and MRO NSRF.</p>	
<p>Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company</p>	
Answer	Yes
Document Name	
Comment	

The language is clear for Section 6.1 and 6.2 that it clarifies this section is specific for Vendor Electronic Remote Access. Section 6.3 could be somewhat ambiguous and may be read to include more than vendor remote access.

Likes	0
Dislikes	0

Response

The SDT thanks you for your comment.

Michael Johnson - Michael Johnson On Behalf of: Ed Hanson, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer	Yes
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Document Name	
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Comment

PG&E agrees with the modifications to Attachment 1, Section 6 and those modifications clearly indicate it is for vendor access from a remote location.

Likes	0
Dislikes	0

Response

The SDT thanks you for your comment.

James Poston - Santee Cooper - 3, Group Name Santee Cooper

Answer	Yes
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Document Name	
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Comment

The wording in sub-parts 6.1 & 6.2 include the same “vendor electronic remote access” language, while subpart 6.3 does not. Sub-part 6.3 should read the same as sub-parts 6.1 & 6.2 so as not to imply that 6.3 should be more broadly enforced beyond its intended purpose.	
Likes 1	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre
Dislikes 0	
Response	
Thank you for your comment, the SDT has updated the language in 6.3 to clarify the intent.	
Justin Welty - NextEra Energy - Florida Power and Light Co. - 6	
Answer	Yes
Document Name	
Comment	
NextEra Energy supports EEI’s comment: EEI agrees that Attachment 1, Section 6 clarifies that vendor’s access to low impact assets containing BES cyber systems is limited to remote locations.	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment, please see response to EEI.	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	

Yes. The SDT clarified that Attachment 1 Section 6 only applies to vendor access to low impact assets containing BES cyber systems from remote (off-site) locations.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

The SDT thanks you for your comment.

Alison Mackellar - Constellation - 5

Answer

Yes

Document Name

Comment

Yes. The SDT clarified that Attachment 1 Section 6 only applies to vendor access to low impact assets containing BES cyber systems from remote (off-site) locations.

Kimberly Turco on behalf of Constellation Segements 5 and 6

Likes 0

Dislikes 0

Response

The SDT thanks you for your comment.

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer

Yes

Document Name	
Comment	
Eenergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #3.	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment, please see response to EEI.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Minnesota Power is in agreement with EEI's comments.	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment, please see response to EEI.	
Clay Walker - Clay Walker On Behalf of: John Lindsey, Cleco Corporation, 6, 5, 1, 3; Maurice Paulk, Cleco Corporation, 6, 5, 1, 3; Robert Hirschak, Cleco Corporation, 6, 5, 1, 3; - Clay Walker	
Answer	Yes
Document Name	
Comment	

Cleco agrees with EEI comments.

Likes 0

Dislikes 0

Response

The SDT thanks you for your comment, please see response to EEI.

Dania Colon - Orlando Utilities Commission - 5

Answer

Yes

Document Name

Comment

See comments under question 2 to help clarify this.

Likes 0

Dislikes 0

Response

The SDT thanks you for your comment.

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer

Yes

Document Name

Comment

EEI agrees that Attachment 1, Section 6 clarifies that vendor’s access to low impact assets containing BES cyber systems is limited to remote locations.

Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon is aligning with EEI in response to this question.	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment, please see response to EEI.	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon is aligning with EEI in response to this question.	
Likes	0
Dislikes	0
Response	

The SDT thanks you for your comment, please see response to EEI.	
Gail Elliott - International Transmission Company Holdings Corporation - NA - Not Applicable - MRO,RF	
Answer	Yes
Document Name	
Comment	
ITC is in agreement with the EEI response	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment, please see response to EEI.	
Kenya Streeter - Edison International - Southern California Edison Company - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
See comments submitted by the Edison Electric Institute	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment, please see response to EEI.	
Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nicholas Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Eric Sutlief - CMS Energy - Consumers Energy Company - 3,4,5 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Martin Sidor - NRG - NRG Energy, Inc. - 6	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Lan Nguyen - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Meaghan Connell - Public Utility District No. 1 of Chelan County - 5, Group Name PUD No. 1 of Chelan County	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Erik Gustafson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Nierenberg, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 1	Public Utility District No. 1 of Snohomish County, 1, Rhoads Alyssia
Dislikes 0	
Response	

Thank you for your support.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; - MEAG Power - 1 - SERC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jennifer Buckman - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
JT Kuehne - AEP - 6	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Michelle Amarantos - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Israel Perez - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Fong Mua, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Goi, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; - Tim Kelley, Group Name SMUD / BANC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	

Steven Rueckert - Western Electricity Coordinating Council - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Gail Golden - Entergy - Entergy Services, Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Mike Magruder - Avista - Avista Corporation - 1

Answer Yes

Document Name

Comment

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Chris Carnesi - Chris Carnesi On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - Chris Carnesi, Group Name NCPA	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Jodirah Green - ACES Power Marketing - 6, Group Name ACES Standard Collaborations

Answer Yes

Document Name

Comment

Likes	0
Dislikes	0
Response	
Thank you for your support.	
patricia ireland - DTE Energy - 4, Group Name DTE Energy	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Brian Evans-Mongeon - Utility Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Teresa Krabe - Lower Colorado River Authority - 5	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Megan Caulson - Megan Caulson On Behalf of: Jennifer Wright, Sempra - San Diego Gas and Electric, 5, 3, 1; - Megan Caulson	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
David Jendras - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for your support.	
James Baldwin - Lower Colorado River Authority - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Mark Ciufo - Mark Ciufo On Behalf of: Payam Farahbakhsh, Hydro One Networks, Inc., 3, 1; - Mark Ciufo	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Barry Jones - Barry Jones On Behalf of: sean erickson, Western Area Power Administration, 1, 6; - Barry Jones	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LaKenya VanNorman - LaKenya VanNorman On Behalf of: Chris Gowder, Florida Municipal Power Agency, 5, 3, 4, 6; Richard Montgomery, Florida Municipal Power Agency, 5, 3, 4, 6; - LaKenya VanNorman, Group Name Florida Municipal Power Agency (FMPA)	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE does not have comments on this question.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Paul Haase - Paul Haase On Behalf of: Hao Li, Seattle City Light, 4, 5, 3, 6, 1; - Paul Haase, Group Name Seattle City Light	
Answer	
Document Name	
Comment	
Seattle City Light abstains	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

4. The SDT has added clarifying language that limits the scope to Section 3.1. Do you believe the language in Attachment 1 Section 6 limits the scope to low impact BES cyber systems? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Deanna Carlson - Cowlitz County PUD - 5

Answer No

Document Name

Comment

Additional clarification needs to ensure that the scope of Section 6 applies only to low impact BES Cyber Systems where vendors are actually given remote access. The language as written can be interpreted that all low impact BES Cyber System that are identified in Section 3.1 should have a process in place to detect, determine, and disable active vendor electric remote access, and malicious communications, regardless of vendors having remote access or not.

Likes 0

Dislikes 0

Response

Thank you for your comment. You are correct the standard was written so that every asset containing low impact BES Cyber Systems where vendor electronic remote access is allowed and the communications conditions outlined in Section 3.1 are subject to the requirements of Section 6. In Section 3.1 the statement "Permit only necessary inbound and outbound electronic access as determined by the Responsible Entity for any communications that are..." combined with the statement in Section 6 ": For assets containing low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible Entity shall implement a process to mitigate risks associated with vendor electronic remote access, where such access has been established under Section 3.1." are the statements which cover whether you must apply Section 6. If you do not allow vendor electronic remote access and the conditions of Section 3.1 are not met, then Section 6 does not apply.

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee

Answer No

Document Name	
Comment	
Request confirmation that the SDT expects all of Attachment 1, Section 3.1 to be in place before Section 6 requirements. If Section 3.1 is not met, then Section 6 does not apply.	
Request clarification on how Sections 3.1 and 6 impact the VSLs.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SDT does intend that all of the conditions of Attachment 1, Section 3.1 be met as a pre-condition for Section 6. Attachemtn 1 is included in the VSL for Requirement R2.	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5	
Answer	No
Document Name	
Comment	
Request confirmation that the SDT expects all of Attachement 1, Section 3.1 to be in place before Section 6 requirements. If Section 3.1 is not met, then Section 6 does not apply. Request clarification on how Sections 3.1 and 6 impacts the VSLs.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SDT does intend that all of the conditions of Attachment 1, Section 3.1 be met as a pre-condition for Section 6. Attachemtn 1 is included in the VSL for Requirement R2.	
Carl Pineault - Hydro-Qu?bec Production - 1,5	

Answer	No
Document Name	
Comment	
<p>Request confirmation that the SDT expects all of Attachment 1, Section 3.1 to be in place before Section 6 requirements. If Section 3.1 is not met, then Section 6 does not apply.</p> <p>Request clarification on how Sections 3.1 and 6 impact the VSLs</p>	
Likes 0	
Dislikes 0	
Response	
<p>Thank you for your comment. CIP-003 R2 identifies all requirements for BES Cyber Systems to meet the security requirements laid out in Attachment 1. The SDT does intend that all of the conditions of Attachment 1, Section 3.1 be met as a pre-condition for Section 6. Attachment 1 is included in the VSL for Requirement R2.</p>	
<p>Chris Carnesi - Chris Carnesi On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - Chris Carnesi, Group Name NCPA</p>	
Answer	No
Document Name	
Comment	
<p>NCPA does not agree with prescriptive language for 6.3 as it relates to detect known or suspected malicious communications. This would be more arduous for Low impact entities to implement compared to non-Control Center Medium Impact facilities as they don't need to comply with CIP-005 R1.5. This creates an imbalance of requiring lower risk facilities to comply with a more strenuous requirement than higher risk facilities. At least limiting 6.3's scope to only Low Impact Control Centers would be somewhat congruent with the CIP-005 R1.5 requirement.</p>	

Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment, please see summary response.	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	No
Document Name	
Comment	
<p>CIP-005-5 R1.5 does not apply to Medium impact BCS if they are not at Control Centers. Why and how the Requirement in Section 6.3 applies to 'Low Impact BCS' is not very clear from the language used. The Section 6.3 does offer possible mitigation of the risks i.e., 'malicious communication and vendor remote access' however this is even more stringent on Low Impact BCS in comparison to CIP-005-5 R1.5.</p> <p>BC Hydro recommends rewording or removing Section 6.3 completely.</p>	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment, please see summary response.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6, Group Name Dominion	
Answer	No
Document Name	
Comment	

There is confusion with the language used in Section 6 as to whether it pertains to the assets containing the low impact BES Cyber Systems (which may contain out of scope cyber systems) or the low impact BES Cyber Systems themselves.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see the summary response.	
Kenya Streeter - Edison International - Southern California Edison Company - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
See comments submitted by the Edison Electric Institute	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment, please see response to EEI.	
Gail Elliott - International Transmission Company Holdings Corporation - NA - Not Applicable - MRO,RF	
Answer	Yes
Document Name	
Comment	
ITC is in agreement with the EEI response	

Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment, please see response to EEI.	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon is aligning with EEI in response to this question.	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment, please see response to EEI.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon is aligning with EEI in response to this question.	
Likes	0
Dislikes	0
Response	

The SDT thanks you for your comment, please see response to EEI.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI agrees that the proposed language in Section 6 limits that scope to Section 3.1.	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment.	
Jodirah Green - ACES Power Marketing - 6, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
The proposed changes to limit scope are redundant. Section 3.1 and Section 6 are explicit to low impact BCS. If vendor remote access wasn't already established and allowed under Section 3.1, there would either be a violation of Section 3.1 or a CIP exceptional circumstance would need to be declared. The language is fine, but unnecessary to try to confine the scope of Section 6 as it is very explicit to low impact BCS.	
Likes	0
Dislikes	0
Response	
Thank you for your comment	

Clay Walker - Clay Walker On Behalf of: John Lindsey, Cleco Corporation, 6, 5, 1, 3; Maurice Paulk, Cleco Corporation, 6, 5, 1, 3; Robert Hirschak, Cleco Corporation, 6, 5, 1, 3; - Clay Walker

Answer	Yes
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Document Name	
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Comment

Cleco agrees with EEI comments.

Likes 0	
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Dislikes 0	
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Response

The SDT thanks you for your comment, please see response to EEI.

Jamie Monette - Allete - Minnesota Power, Inc. - 1

Answer	Yes
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Document Name	
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Comment

Minnesota Power is in agreement with EEI's comments.

Likes 0	
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Dislikes 0	
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Response

The SDT thanks you for your comment, please see response to EEI.

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer	Yes
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Document Name	
Comment	
Energy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #4.	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment, please see response to EEI.	
Alison Mackellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Kimberly Turco on behalf of Constellation Segements 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Kimberly Turco on behalf of Constellation Segments 5 and 6	

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Justin Welty - NextEra Energy - Florida Power and Light Co. - 6	
Answer	Yes
Document Name	
Comment	
NextEra Energy supports EEI's comment: EEI agrees that the proposed language in Section 6 limits that scope to Section 3.1.	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment, please see response to EEI.	
Michael Johnson - Michael Johnson On Behalf of: Ed Hanson, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees the modification to Section 3.1 make it clear the scope of the Requirement is for low impact BES Cyber Systems.	
Likes	0
Dislikes	0

Response	
The SDT thanks you for your comment.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Southern agrees the language in Attachment 1 Section 6 limits the scope to low impact BES cyber systems.	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment.	
Joe Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
Xcel Energy supports the comments of EEI and the MRO NSRF.	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment, please see response to EEI and MRO NSRF.	
Russell Noble - Cowlitz County PUD - 3	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LaKenya VanNorman - LaKenya VanNorman On Behalf of: Chris Gowder, Florida Municipal Power Agency, 5, 3, 4, 6; Richard Montgomery, Florida Municipal Power Agency, 5, 3, 4, 6; - LaKenya VanNorman, Group Name Florida Municipal Power Agency (FMPA)	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Barry Jones - Barry Jones On Behalf of: sean erickson, Western Area Power Administration, 1, 6; - Barry Jones	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Mark Ciufu - Mark Ciufu On Behalf of: Payam Farahbakhsh, Hydro One Networks, Inc., 3, 1; - Mark Ciufu	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Benjamin Winslett - Georgia System Operations Corporation - 4	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
James Baldwin - Lower Colorado River Authority - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
David Jendras - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for your support.	
Megan Caulson - Megan Caulson On Behalf of: Jennifer Wright, Sempra - San Diego Gas and Electric, 5, 3, 1; - Megan Caulson	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Teresa Krabe - Lower Colorado River Authority - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Brian Evans-Mongeon - Utility Services, Inc. - 4	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Dania Colon - Orlando Utilities Commission - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
patricia ireland - DTE Energy - 4, Group Name DTE Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	

Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Gail Golden - Entergy - Entergy Services, Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Thank you for your support.	
Steven Rueckert - Western Electricity Coordinating Council - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Fong Mua, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Goi, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; - Tim Kelley, Group Name SMUD / BANC	
Answer	Yes
Document Name	

Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Richard Jackson - U.S. Bureau of Reclamation - 1,5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Thank you for your support.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Israel Perez - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Michelle Amarantos - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
JT Kuehne - AEP - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jennifer Buckman - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; - MEAG Power - 1 - SERC	
Answer	Yes
Document Name	
Comment	

Likes	0	
Dislikes	0	
Response		
Thank you for your support.		
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Nierenberg, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power		
Answer		Yes
Document Name		
Comment		
Likes	1	Public Utility District No. 1 of Snohomish County, 1, Rhoads Alyssia
Dislikes	0	
Response		
Thank you for your support.		
James Poston - Santee Cooper - 3, Group Name Santee Cooper		
Answer		Yes
Document Name		
Comment		
Likes	0	
Dislikes	0	
Response		
Thank you for your support.		

Ron Wilgers - Black Hills Corporation - 3 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Micah Runner - Black Hills Corporation - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sheila Suurmeier - Black Hills Corporation - 1,3,5,6	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Claudine Bates - Black Hills Corporation - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Erik Gustafson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Meaghan Connell - Public Utility District No. 1 of Chelan County - 5, Group Name PUD No. 1 of Chelan County	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for your support.	
Lan Nguyen - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Martin Sidor - NRG - NRG Energy, Inc. - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Eric Sutlief - CMS Energy - Consumers Energy Company - 3,4,5 - RF	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nicholas Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1	
Answer	Yes
Document Name	

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Paul Haase - Paul Haase On Behalf of: Hao Li, Seattle City Light, 4, 5, 3, 6, 1; - Paul Haase, Group Name Seattle City Light

Answer

Document Name

Comment

Seattle City Light abstains

Likes 0

Dislikes 0

Response

Thank you for your response.

5. The SDT proposes that the modifications in CIP-003-X meet the NERC Board resolution 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.

Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6, Group Name Dominion

Answer	No
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Document Name	
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Comment

The scope should be narrowed to just where the risk exists as opposed to a broad swath of assets. The way it is written it implies that all communications need to be monitored to determine malicious communications through vendor remote access.

Likes 0	
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Dislikes 0	
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Response

Thank you for your comment. The SDT has made changes to the language in section 6.3 to clarify the intent.

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer	No
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Document Name	
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Comment

Although the cost may differ between entities, BC Hydro's assessment is that the impact may change based on understanding & clarity of terms and scope of application. As advised in comments of Question 1 above, CIP-005-5 R1.5 does not apply to Medium impact BCS if they are not at Control Centers. However requirement in CIP-003-X Section 6.3 applies to 'Low Impact BCS' which is even more stringent

on Low Impact BCS in comparison to CIP-005-5 R1.5, where only High and Medium Impact BCS at Control Centers are in scope leaving all the other Medium impact BCS out of scope.

Implementing this requirement and adding detection methods for known or suspected malicious communications for both inbound and outbound communications concerning Low impact BCS will likely have significant cost impact.

Likes 0

Dislikes 0

Response

Thank you for your comment, please see summary response.

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Nierenberg, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer

No

Document Name

Comment

Including a more restrictive prescriptive control for malicious communication detection for low impact BCS that does not exist for medium impact BCS not at a Control Center is not a cost-effective approach. Medium impact BCS not at a Control Center must still follow CIP-005 R2 for remote access through an intermediate system. This was mentioned as justification for including Section 6.3 for low impact but not requiring for Medium impact BCS not at a Control Center. If an entity implements CIP-005 R2 Intermediate Systems for low impact, they will still not be compliant with CIP-003, Attachment 1, Section 6.3 as currently worded.

In order to provide a more cost effective solution, Tacoma Power suggests that an entity can mitigate the risks associated with vendor electronic remote access through various means and still address disabling of vendor electric remote access, and malicious communication protection.

Suggested wording to avoid prescriptive language and provide a more cost effective solution:

Section 6: Vendor Electronic Remote Access Security Controls: For assets containing low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible Entity shall implement a process to mitigate risks associated with vendor electronic remote access, where such access has been established under Section 3.1. These processes shall **address**:

6.1 determining and disabling **active** vendor electronic remote access sessions, **if applicable**; and

6.2 malicious communications.

Likes 2	Platte River Power Authority, 3, Kiess Wade; Public Utility District No. 1 of Snohomish County, 1, Rhoads Alyssia
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Dislikes 0	
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Response

Thank you for your comment. The team has added language to section 6 to clarify this intent. Additionally, see summary response above.

John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; - MEAG Power - 1 - SERC

Answer	No
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Document Name	
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Comment

Section 6.3 is written in prescriptive way toward only one of many possible solutions for addressing malicious communications. This does not allow entities to analyze and choose the most cost effective approach to addressing and mitigating malicious communication.

Likes 0	
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Dislikes 0	
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Response

Thank you for your comment. The SDT feels that the current language is the best version that allows entities maximum flexibility for program design and follow-through.

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer	No
Document Name	
Comment	
<p>Including a more restrictive prescriptive control for malicious communication detection for low impact BCS that does not exist for medium impact BCS not at a Control Center is not a cost-effective approach. Medium impact BCS not at a Control Center must still follow CIP-005 R2 for remote access through an intermediate system. This was mentioned as justification for including Section 6.3 for low impact but not requiring for Medium impact BCS not at a Control Center. If an entity implements CIP-005 R2 Intermediate Systems for low impact, they will still not be compliant with CIP-003, Attachment 1, Section 6.3 as currently worded.</p>	
Likes 0	
Dislikes 0	
Response	
<p>The SDT thanks you for your comment, please see summary response.</p>	
Richard Jackson - U.S. Bureau of Reclamation - 1,5	
Answer	No
Document Name	
Comment	
<p>Reclamation identifies that it is not cost effective to have separate standards for low impact and medium impact BES Cyber Systems, especially when the language of the requirements for each impact level is identical. Reclamation observes that Project 2016-02 will bring many changes to a majority of the CIP standards; therefore, Reclamation recommends Project 2016-02 is a good avenue to incorporate low impact requirements into the CIP standards and avoid the continuous churn of CIP-003 Attachment 1 when ultimately the requirements for low impact BES Cyber Systems will end up being identical to those for medium impact BCS.</p>	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. The SDT maintains that entities with only low-impact assets, are subject to CIP-003 only and this is why medium and low impact are in separate standards. This team has coordinated with Project 2016-02 and is attempting to minimize the number of versions of CIP-003 that become enforceable.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Fong Mua, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Goi, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; - Tim Kelley, Group Name SMUD / BANC	
Answer	No
Document Name	
Comment	
SMUD and BANC support Tacoma Power's comment.	
Likes	0
Dislikes	0
Response	
Thank you for your comment, please see response to Tacoma Power.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	No
Document Name	
Comment	
We do not have enough information at this time to address cost-effectiveness of the revisions.	
Likes	0
Dislikes	0

Response	
The SDT thanks you for your comment.	
patricia ireland - DTE Energy - 4, Group Name DTE Energy	
Answer	No
Document Name	
Comment	
Cost effectiveness of Attachment 1, 6.1, 6.2, and 6.3 is unknown at this time since the capability will require a technical solution not currently in place. Further, this requirement is not consistent with current CIP-005-6 and future CIP-005-7 enforceable requirements.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. The SDT maintains that entities with only low-impact assets, are subject to CIP-003 only and this is why medium and low impact are in separate standards.	
Teresa Krabe - Lower Colorado River Authority - 5	
Answer	No
Document Name	
Comment	
There is a high probability that new technology controls will be required to meet the new requirements. Entities would need to allocate funds and projects to implement new technologies.	
Likes	0
Dislikes	0
Response	

Thank you for your comment	
James Baldwin - Lower Colorado River Authority - 1	
Answer	No
Document Name	
Comment	
There is a high probability that new technology controls will be required to meet the new requirements. Entities would need to allocate funds and projects to implement new technologies.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment	
Kinte Whitehead - Exelon - 3	
Answer	No
Document Name	
Comment	
Exelon is aligning with EEI in response to this question.	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment, please see response to EEI.	
Russell Noble - Cowlitz County PUD - 3	

Answer	No
Document Name	
Comment	
See comments as supplied by Deanna Carlson from Cowlitz PUD.	
Likes 0	
Dislikes 0	
Response	
Thank you for your commnet, please see response to Deanna Carlson.	
Deanna Carlson - Cowlitz County PUD - 5	
Answer	No
Document Name	
Comment	
The scope should be modified to read more like an objective-based requirement allowing entities more leeway and potentially more cost-effective means to comply with the specific list of assets identified. Recognition that not all communications need to be monitored to determine malicious communications through active vendor remote access will ensure resources are focused on actual risk.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SDT feels that the current language is the best version that allows entities maximum flexibility for program design and follow-through.	
Joe Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC	
Answer	Yes

Document Name	
Comment	
Xcel Energy agrees that the modifications can be implemented in a cost-effective manner when implemented within the timeframe identified in the associated Implementation Plan.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Michael Johnson - Michael Johnson On Behalf of: Ed Hanson, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
Until an approved Standard is in place, PG&E cannot make a determination if the modification are cost effective.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	

It is cost effective, but these costs will be pushed directly to ratepayers which requires FERC support to answer the ratepayers.	
Likes	0
Dislikes	0
Response	
Thank you for your comment.	
Carl Pineault - Hydro-Quebec Production - 1,5	
Answer	Yes
Document Name	
Comment	
We requested redline to last approved. SMEs need to see red lines to the currently effective standard, to adequately review the proposed changes. Without this red line, the review is very challenging and may reduce the chances for approval.	
Likes	0
Dislikes	0
Response	
Thank you for your comment, redline to last approved it posted with final ballot.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Minnesota Power is in agreement with EEI's comments.	

Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment, please see response to EEI.	
Kenya Streeter - Edison International - Southern California Edison Company - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
See comments submitted by the Edison Electric Institute	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment, please see response to EEI.	
Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	

Eric Sutlief - CMS Energy - Consumers Energy Company - 3,4,5 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Martin Sidor - NRG - NRG Energy, Inc. - 6	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Meaghan Connell - Public Utility District No. 1 of Chelan County - 5, Group Name PUD No. 1 of Chelan County	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Erik Gustafson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC,Texas RE	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
James Poston - Santee Cooper - 3, Group Name Santee Cooper	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jennifer Buckman - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
JT Kuehne - AEP - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Michelle Amarantos - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Steven Rueckert - Western Electricity Coordinating Council - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Gail Golden - Entergy - Entergy Services, Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Chris Carnesi - Chris Carnesi On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - Chris Carnesi, Group Name NCPA	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Clay Walker - Clay Walker On Behalf of: John Lindsey, Cleco Corporation, 6, 5, 1, 3; Maurice Paulk, Cleco Corporation, 6, 5, 1, 3; Robert Hirschak, Cleco Corporation, 6, 5, 1, 3; - Clay Walker	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jodirah Green - ACES Power Marketing - 6, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Dania Colon - Orlando Utilities Commission - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for your support.	
Brian Evans-Mongeon - Utility Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Megan Caulson - Megan Caulson On Behalf of: Jennifer Wright, Sempra - San Diego Gas and Electric, 5, 3, 1; - Megan Caulson	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Mark Ciufu - Mark Ciufu On Behalf of: Payam Farahbakhsh, Hydro One Networks, Inc., 3, 1; - Mark Ciufu	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Barry Jones - Barry Jones On Behalf of: sean erickson, Western Area Power Administration, 1, 6; - Barry Jones	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
LaKenya VanNorman - LaKenya VanNorman On Behalf of: Chris Gowder, Florida Municipal Power Agency, 5, 3, 4, 6; Richard Montgomery, Florida Municipal Power Agency, 5, 3, 4, 6; - LaKenya VanNorman, Group Name Florida Municipal Power Agency (FMPA)	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nicholas Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh	
Answer	
Document Name	
Comment	
NST abstains.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Claudine Bates - Black Hills Corporation - 1,3,5,6	

Answer	
Document Name	
Comment	
We do not have insight to whether this is cost effective or not so Black Hills Corporation will not be providing a comment.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Sheila Suurmeier - Black Hills Corporation - 1,3,5,6	
Answer	
Document Name	
Comment	
We do not have insight to whether this is cost effective or not so Black Hills Corporation will not be providing a comment.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Micah Runner - Black Hills Corporation - 1,3,5,6	
Answer	
Document Name	
Comment	

We do not have insight to whether this is cost effective or not so Black Hills Corporation will not be providing a comment.	
Likes	0
Dislikes	0
Response	
Thank you for your comment.	
Ron Wilgers - Black Hills Corporation - 3 - WECC	
Answer	
Document Name	
Comment	
We do not have insight to whether this is cost effective or not so Black Hills Corporation will not be providing a comment.	
Likes	0
Dislikes	0
Response	
Thank you for your comment.	
Justin Welty - NextEra Energy - Florida Power and Light Co. - 6	
Answer	
Document Name	
Comment	
NextEra Energy is not supplying a position nor comment on cost effectiveness of these changes.	
Likes	0

Dislikes	0
Response	
Thank you for your comment.	
Kimberly Turco - Constellation - 6	
Answer	
Document Name	
Comment	
Constellation will not comment on cost.	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes	0
Dislikes	0
Response	
Thank you for your comment.	
Alison Mackellar - Constellation - 5	
Answer	
Document Name	
Comment	
Constellation will not comment on cost.	

Kimberly Turco on behalf of Constellation Segements 5 and 6

Likes 0

Dislikes 0

Response

Thank you for your comment.

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE does not have comments on this question.

Likes 0

Dislikes 0

Response

Thank you for your comment.

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

Document Name

Comment

Unable to justify cost effectiveness at this time

Likes 0

Dislikes 0

Response	
Thank you for your comment.	
Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	
Document Name	
Comment	
GO/GOPs will need more information to adequately assess the cost-effectiveness of the proposed approach.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Daniel Gacek - Exelon - 1	
Answer	
Document Name	
Comment	
Exelon is aligning with EEI in response to this question.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment, please see response to EEI.	
Gail Elliott - International Transmission Company Holdings Corporation - NA - Not Applicable - MRO,RF	

Answer	
Document Name	
Comment	
ITC is in agreement with the EEI response	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment, please see response to EEI.	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5	
Answer	
Document Name	
Comment	
Once again, we requested redline to last approved. SMEs need to see red lines to the currently effective standard, to adequately review the proposed changes. Without this red line, the review is very challenging and may reduce the chances for approval.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment, redline to last approved is provided during final ballot.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee	
Answer	
Document Name	

Comment

Once again, we requested a redline to the last approved. SMEs need to see red lines to the currently effective standard, to adequately review the proposed changes. Without this red line, the review is very challenging and may reduce the chances of approval.

Otherwise, TFIST abstains from commenting on cost effective.

Likes 0

Dislikes 0

Response

Thank you for your comment, redline to last approved is provided during final ballot.

Paul Haase - Paul Haase On Behalf of: Hao Li, Seattle City Light, 4, 5, 3, 6, 1; - Paul Haase, Group Name Seattle City Light

Answer

Document Name

Comment

Seattle City Light abstains

Likes 0

Dislikes 0

Response

Thank you for your comment.

6. The SDT is proposing a 36-month implementation plan for Attachment 1, Section 6 based on industry feedback. Would these proposed timeframes give enough time to put into place process, procedures or technology to meet the proposed language in Section 6? 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.

patricia ireland - DTE Energy - 4, Group Name DTE Energy

Answer No

Document Name

Comment

It is difficult to estimate as the scope of 6.3 is not clear yet.

Likes 0

Dislikes 0

Response

Thank you for your comment. The team has made changes to 6.3 to clarify intent.

Steven Rueckert - Western Electricity Coordinating Council - 10

Answer No

Document Name

Comment

While WECC does not believe the extended 36-month Implementation Plan is reason to vote NO, we believe that considering the risks that are facing the system, the DT should consider moving the Implementation back to 24 months as was included in earlier versions of the draft standard. However, if a 36-month Implementation Plan is what is necessary to gain approval of the Standard, WECC understands.

Likes	0
Dislikes	0
Response	
Thank you for your comment. The drafting team extended the timeline based on feedback from industry in the previous two ballots and believes this timeframe is the most appropriate.	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	No
Document Name	
Comment	
BC Hydro recommends a longer implementation plan, e.g. more than ~36 months, considering the cost and scope impact as identified in comments to Question 1 and 4 above. Once the clarity of terms and definitions is obtained as identified in comments to Question 1 and 4, BC Hydro will be in a better position to provide an alternate detailed implementation plan to meet the target completion deadline.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. The drafting team decided on a 36 month timeline based on feedback from industry in the previous two ballots and believes this timeframe is the most appropriate.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6, Group Name Dominion	
Answer	No
Document Name	
Comment	

<p>Large entities with hundreds of low impact facilities will need more implementation time for addressing the changes applicable to low impact assets. Suggested timeline is a 5 year plan, implementing 20% of the assets per year.</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your comment. The drafting team decided on a 36 month timeline based on feedback from industry in the previous two ballots and believes this timeframe is the most appropriate.</p>	
<p>Kenya Streeter - Edison International - Southern California Edison Company - 1,3,5,6</p>	
Answer	Yes
Document Name	
Comment	
<p>See comments submitted by the Edison Electric Institute</p>	
Likes	0
Dislikes	0
Response	
<p>The SDT thanks you for your comment, please see response to EEI.</p>	
<p>Deanna Carlson - Cowlitz County PUD - 5</p>	
Answer	Yes
Document Name	
Comment	
<p>Cowlitz PUD, Segment 5 8/19/2022</p>	

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee	
Answer	Yes
Document Name	
Comment	
We agree with 36 months.	
Request deletion of the following language because this language refers to a removed Section – “Where the standard drafting team identified the need for a longer implementation period for compliance with a particular section of a proposed Reliability Standard (i.e., an entire Requirement or a portion thereof), the additional time for compliance with that section is specified below. The phased-in compliance date for that particular section represents the date that Responsible Entities must begin to comply with that particular section of the Reliability Standard, even where the Reliability Standard goes into effect at an earlier date.”	
Likes	0
Dislikes	0
Response	
Thank you for your comment, the team has removed the identified language from the implementation plan.	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5	
Answer	Yes
Document Name	
Comment	

Agree with 36-months. Request deletion of the following language because this language refers to a removed Section - "Where the standard drafting team identified the need for a longer implementation period for compliance with a particular section of a proposed Reliability Standard (i.e., and entire Requirement or a portion thereof), the additional time for compliance with that section is specified below. The phased-in compliance date for that particular section represents the date that Responsible Entities must begin to comply with that particular section of the Reliability Standard, even where the Reliability Standard does into effect at an earlier date."

Likes 0

Dislikes 0

Response

Thank you for your comment, the team has removed the identified language from the implementation plan.

Gail Elliott - International Transmission Company Holdings Corporation - NA - Not Applicable - MRO,RF

Answer

Yes

Document Name

Comment

ITC is in agreement with the EEI response

Likes 0

Dislikes 0

Response

The SDT thanks you for your comment, please see response to EEI.

Kinte Whitehead - Exelon - 3

Answer

Yes

Document Name

Comment

Exelon is aligning with EEI in response to this question.

Likes 0

Dislikes 0

Response

The SDT thanks you for your comment, please see response to EEI.

Daniel Gacek - Exelon - 1

Answer

Yes

Document Name

Comment

Exelon is aligning with EEI in response to this question.

Likes 0

Dislikes 0

Response

The SDT thanks you for your comment, please see response to EEI.

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer

Yes

Document Name

Comment

EEI supports the proposed 36-month implantation plan for attachment 1, Section 6.

Likes 0

Dislikes	0
Response	
The SDT thanks you for your comment.	
Clay Walker - Clay Walker On Behalf of: John Lindsey, Cleco Corporation, 6, 5, 1, 3; Maurice Paulk, Cleco Corporation, 6, 5, 1, 3; Robert Hirschak, Cleco Corporation, 6, 5, 1, 3; - Clay Walker	
Answer	Yes
Document Name	
Comment	
Cleco agrees with EEI comments.	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment, please see response to EEI.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Minnesota Power is in agreement with EEI's comments.	
Likes	0
Dislikes	0
Response	

The SDT thanks you for your comment, please see response to EEI.	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Duke Energy thanks the Standard Drafting Team for this important revision. We fully support the proposed implementation timeline.	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment.	
Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	Yes
Document Name	
Comment	
The NAGF supports the SDT's proposed implementation timeframe recommendation.	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment.	
Carl Pineault - Hydro-Quebec Production - 1,5	
Answer	Yes

Document Name	
Comment	
<p>We agree with 36-months.</p> <p>Request deletion of the following language because this language refers to a removed Section – “Where the standard drafting team identified the need for a longer implementation period for compliance with a particular section of a proposed Reliability Standard (i.e., an entire Requirement or a portion thereof), the additional time for compliance with that section is specified below. The phased-in compliance date for that particular section represents the date that Responsible Entities must begin to comply with that particular section of the Reliability Standard, even where the Reliability Standard goes into effect at an earlier date.”</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your comment, the team has removed the identified language from the implementation plan.</p>	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
<p>Increasing the implementation time from 18 to 36 months should allow adequate time for implementation.</p>	
Likes	0
Dislikes	0
Response	
<p>The SDT thanks you for your comment.</p>	
Gail Golden - Entergy - Entergy Services, Inc. - 5	

Answer	Yes
Document Name	
Comment	
Risk: Supply chain risk to be taken into factor.	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment.	
Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #6.	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment, please see response to EEI.	
Alison Mackellar - Constellation - 5	
Answer	Yes
Document Name	

Comment

Yes. The proposed 36 months would give enough time to put the process, procedures and technology in place to meet the proposed language in Section 6.

Kimberly Turco on behalf of Constellation Segements 5 and 6

Likes 0

Dislikes 0

Response

The SDT thanks you for your comment.

Kimberly Turco - Constellation - 6

Answer

Yes

Document Name

Comment

Yes. The proposed 36 months would give enough time to put the process, procedures and technology in place to meet the proposed language in Section 6.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

The SDT thanks you for your comment.

Justin Welty - NextEra Energy - Florida Power and Light Co. - 6

Answer

Yes

Document Name	
Comment	
NextEra Energy supports EEI's comment: EEI supports the proposed 36-month implantation plan for attachment 1, Section 6.	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment, please see response to EEI.	
Michael Johnson - Michael Johnson On Behalf of: Ed Hanson, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the 36-month implementation plan and that it would be sufficient time for PG&E to implement the proposed modifications.	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	

Increasing the implementation time from 18 to 36 months should allow adequate time for implementation.	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Southern agrees and supports the proposed 36-month implementation plan.	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment.	
Joe Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
Xcel Energy supports the comments of EEI and the MRO NSRF.	
Likes	0
Dislikes	0

Response	
The SDT thanks you for your comment, please see response to EEI and MRS NSRF.	
Lan Nguyen - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
CenterPoint Energy Houston Electric, LLC (CEHE) supports the 36 calendar month implementation.	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment.	
Russell Noble - Cowlitz County PUD - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
LaKenya VanNorman - LaKenya VanNorman On Behalf of: Chris Gowder, Florida Municipal Power Agency, 5, 3, 4, 6; Richard Montgomery, Florida Municipal Power Agency, 5, 3, 4, 6; - LaKenya VanNorman, Group Name Florida Municipal Power Agency (FMPA)	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Barry Jones - Barry Jones On Behalf of: sean erickson, Western Area Power Administration, 1, 6; - Barry Jones	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for your support.	
Mark Ciufo - Mark Ciufo On Behalf of: Payam Farahbakhsh, Hydro One Networks, Inc., 3, 1; - Mark Ciufo	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
James Baldwin - Lower Colorado River Authority - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
David Jendras - Ameren - Ameren Services - 3	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Megan Caulson - Megan Caulson On Behalf of: Jennifer Wright, Sempra - San Diego Gas and Electric, 5, 3, 1; - Megan Caulson	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Teresa Krabe - Lower Colorado River Authority - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Brian Evans-Mongeon - Utility Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Dania Colon - Orlando Utilities Commission - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jodirah Green - ACES Power Marketing - 6, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Chris Carnesi - Chris Carnesi On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - Chris Carnesi, Group Name NCPA	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Fong Mua, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Goi, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; - Tim Kelley, Group Name SMUD / BANC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Richard Jackson - U.S. Bureau of Reclamation - 1,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Israel Perez - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Michelle Amarantos - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	

Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
JT Kuehne - AEP - 6	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jennifer Buckman - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Thank you for your support.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; - MEAG Power - 1 - SERC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Nierenberg, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes	1
Dislikes	0
Response	
Thank you for your support.	
James Poston - Santee Cooper - 3, Group Name Santee Cooper	
Answer	Yes
Document Name	

Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Erik Gustafson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Thank you for your support.	
Meaghan Connell - Public Utility District No. 1 of Chelan County - 5, Group Name PUD No. 1 of Chelan County	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Martin Sidor - NRG - NRG Energy, Inc. - 6	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Eric Sutlief - CMS Energy - Consumers Energy Company - 3,4,5 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nicholas Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Paul Haase - Paul Haase On Behalf of: Hao Li, Seattle City Light, 4, 5, 3, 6, 1; - Paul Haase, Group Name Seattle City Light	
Answer	
Document Name	
Comment	

Seattle City Light abstains	
Likes	0
Dislikes	0
Response	
Thank you for your comment.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE does not have comments on this question.	
Likes	0
Dislikes	0
Response	
Thank you for your comment.	
Ron Wilgers - Black Hills Corporation - 3 - WECC	
Answer	
Document Name	
Comment	
We do not have insight to whether this is cost effective or not so Black Hills Corporation will not be providing a comment.	
Likes	0

Dislikes 0	
Response	
Thank you for your comment.	
Micah Runner - Black Hills Corporation - 1,3,5,6	
Answer	
Document Name	
Comment	
We do not have insight to whether this is cost effective or not so Black Hills Corporation will not be providing a comment.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Sheila Suurmeier - Black Hills Corporation - 1,3,5,6	
Answer	
Document Name	
Comment	
We do not have insight to whether this is cost effective or not so Black Hills Corporation will not be providing a comment.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

Claudine Bates - Black Hills Corporation - 1,3,5,6	
Answer	
Document Name	
Comment	
We do not have insight to whether this is cost effective or not so Black Hills Corporation will not be providing a comment.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

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

Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nicholas Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh

Answer

Document Name

Comment

NST believes redline versions of-proposed Standards should be markups to "last approved," not markups to previous proposed versions. The practice of redlining previous drafts makes it difficult to compare proposed new or modified requirement language to current, in-effect requirements.

NST believes the SDT should, in addition to addressing the NERC Board resolution, revise CIP-003 Requirement R2 to state that documented cyber security plan(s) for a Responsible Entity's low impact BES Cyber Systems are required to address Attachment 1 Sections 3, 5, and 6 only if the following conditions exist:

For Section 3, only if one or more of the Responsible Entity's assets that contain low impact BCS has external connectivity of a type that matches the descriptions in Sections 3.1 and/or 3.2.

For Section 5, only if TCAs and RMs are used at one or more of the Responsible Entity's assets that contain low impact BCS and are occasionally connected to BCS.

For Section 6, only if (a) Section 3.1 is applicable and (b) vendor remote access is permitted.

A Responsible Entity with no vendor remote access should not be expected to document how it addresses Section 6 requirements.

Likes 0

Dislikes 0

Response

Thank you for your comment. The SDT posts redline to last approved on the final ballot.

Please see SDT summary response re. the alignment of the standard revisions with the approved SAR.

Section 6 requires Responsible Entities to mitigate risks associated with vendor electronic remote access, where such access has been established under Section 3.1. An acceptable process of mitigation may be for an entity to completely restrict such access; in this case, an entity may want to document associated controls or policies associated with these restrictions.

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1

Answer

Document Name

Comment

We appreciate the time and level of effort that the Drafting Team has put in to address the many concerns related to vendor access to Low Impact Cyber Systems. Their efforts will eventually result in modifications to CIP-003 that will benefit the industry, protect the Bulk Electric System, and better serve the ratepayers.

Likes 0

Dislikes 0

Response

The SDT thanks you for your comment.

Lan Nguyen - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer

Document Name

Comment

CEHE recommends the following revisions be made to the CIP-003-X Technical Rationale document for clarity:

1. Define the acronym “SAR” as “Standard Authorization Request” and
2. On page 5, under “1. Electronic remote access:”, add a statement to clarify that “electronic remote access” includes interactive and system-to-system remote access.

Likes 0

Dislikes 0

Response

Thank you for your comments. The SDT has revised the Technical Rationale document to ensure the full name for 'Standard Authorization Request' is used in the first instance of its use, with the commonly understood acronym 'SAR' used thereafter.

Per the Technical Rationale, the SDT avoided using NERC defined terms: Interactive Remote Access in order to prevent applying high and medium impact requirements upon low impact assets and systems

Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO

Answer

Document Name

Comment

Attachment 1, Section 6, sub-section 3. The wording is good but can further be clarified by adding “for vendor electronic remote access” to the end:

One or more method(s) for detecting known or suspected inbound and outbound malicious communications **for vendor electronic remote access.**

Attachment 2, Section 6, sub-section 3. (examples of evidence) the wording is good but can further be clarified:

Network based Anti-malware technologies such as deep packet inspection;

Intrusion Detection System (IDS)/Intrusion Prevention System (IPS); or
 Automated or manual log reviews; or
 Automated User Behaviour Analytics (UBA); or
 SIEM network traffic or vendor remote access log analysis and alerting; or
 other operational, procedural, or technical controls.

Likes 0

Dislikes 0

Response

Thank you for your comments. In light of industry feedback, and for absolute clarity, the SDT has revised 6.3 to add ‘for vendor electronic remote access’. The SDT notes that this was the original intent of section 6.3 as it was anticipated that the vendor remote access criteria from the Section 6 ‘parent’ statement applied to all the sections (6.1-6.3) below.

At this time the SDT will not be adding additional evidence examples. The SDT would like to reinforce the message that the examples included in Attachment 2 are not intended to dictate appropriate compliance evidence nor are they intended to limit an entity in determining what evidence they provide.

Joe Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC

Answer

Document Name

Comment

Xcel Energy supports the comments of EEI and the MRO NSRF.

Likes 0

Dislikes 0

Response	
The SDT thanks you for your comment, please see response to EEI and MRO NSRF.	
Meaghan Connell - Public Utility District No. 1 of Chelan County - 5, Group Name PUD No. 1 of Chelan County	
Answer	
Document Name	
Comment	
In the Consideration of Comments document for the Draft 2 ballot, the SDT states that "...the SDT believes "remote access" is any access that crosses this boundary (Attachment 1 Section 3.1). If a vendor is "onsite" but starts the connection process outside this boundary, this connection should be considered remote access." CHPD believes that by including this statement in the Technical Rational document it will provide stakeholders and the ERO Enterprise with a better understanding of the requirements in the CIP-003-X Reliability Standard.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. As outlined in CIP-003-X, Attachment 1, Section 6, the scope of CIP-003-X Section 6 is limited by the access condition outlined in Section 3.1 of Attachment 1. The SDT agrees with the statement "If a vendor is "onsite" but starts the connection process outside this boundary, this connection should be considered remote access."	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	
Document Name	
Comment	
Consider updating Section 6.3 to be more clear in identifying the language is specifically geared towards Vendor Electronic Remote Access only .	
Likes 0	

Dislikes	0
Response	
Thank you for your comment. In light of industry feedback, and for absolute clarity, the SDT has revised 6.3 to add ‘for vendor electronic remote access’. The SDT notes that this was the original intent of section 6.3 as it was anticipated that the vendor remote access criteria from the Section 6 ‘parent’ statement applied to all the sections (6.1-6.3) below.	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	
Document Name	
Comment	
BC Hydro acknowledges the SDT's effort and hard work which went into putting together these complex changes to CIP-003-X. As identified in comments of question 1 to 4 above, the definitions of terms and clarity of application with some specific industry use case examples will help providing a more clear understanding and likely result in a faster and appropriate approvals of these proposed changes.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see SDT responses to questions above.	
Michael Johnson - Michael Johnson On Behalf of: Ed Hanson, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	
Document Name	
Comment	

PG&E wishes to thank the SDT for listening to the industry’s input and the effort in making these modifications to address the NERC Boards resolution

Likes 0

Dislikes 0

Response

The SDT thanks you for your comment.

Claudine Bates - Black Hills Corporation - 1,3,5,6

Answer

Document Name

Comment

n/a

Likes 0

Dislikes 0

Response

Thank you for your response.

Sheila Suurmeier - Black Hills Corporation - 1,3,5,6

Answer

Document Name

Comment

N/A

Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Micah Runner - Black Hills Corporation - 1,3,5,6	
Answer	
Document Name	
Comment	
NA	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Ron Wilgers - Black Hills Corporation - 3 - WECC	
Answer	
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	

Thank you for your response.	
Justin Welty - NextEra Energy - Florida Power and Light Co. - 6	
Answer	
Document Name	
Comment	
NextEra Energy thanks the SDT for its service of improving the security of the bulk electric system.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Kimberly Turco - Constellation - 6	
Answer	
Document Name	
Comment	
Constellation does not have any additional comments.	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	

Alison Mackellar - Constellation - 5	
Answer	
Document Name	
Comment	
Constellation does not have additional comments.	
Kimberly Turco on behalf of Constellation Segements 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; - MEAG Power - 1 - SERC	
Answer	
Document Name	
Comment	
Even though Attachment 1, Section 6 addresses the risk of malicious communication, it does so in a prescriptive way in that the standard is directing utilities toward a particular solution (e.g. detecting with software/hardware or detection processes) rather than allowing the utility to choose the best approach/method to address and mitigate malicious communication.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see the SDT summary comments regarding the draft standards alignment with the final SAR.	

The SDT would like to reinforce the message that the examples included in Attachment 2 are not intended to dictate appropriate compliance evidence nor are they intended to limit an entity in determining what evidence they provide.

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

In Attachment 1, Section 6, Texas RE recommends specifying “pursuant to CIP-002” rather than referencing another NERC Reliability Standard, as requirements should be complete and self-contained as noted in the Ten Benchmarks of an Excellent Reliability Standard. Texas RE recommends the following language: “For each asset that contains a low impact BES Cyber System, and for which the Responsible Entity allows vendor remote access, the Responsible Entity shall implement a process to mitigate risks associated with vendor electronic remote access.”

Additionally, Texas RE recommends the SDT Include language for (1) software integrity and authenticity, (2) information system planning, and (3) vendor risk and procurement controls, which addresses various aspects of supply chain risk management as is consistent with Reliability Standards CIP-013 and CIP-010.

Likes 0

Dislikes 0

Response

Thank you for your comment. The SDT will not be adopting Texas RE's suggested language as the cross-referencing of standards is consistent within CIP-003 and the SDT would like to remain consistent with this approach.

Thank you for the additional recommended controls, please see the SDT summary comments re. aligning the draft standard with the approved SAR.

JT Kuehne - AEP - 6

Answer

Document Name

Comment

No additional comments at this time. AEP thanks the SDT for their efforts on this draft.

Likes 0

Dislikes 0

Response

The SDT thanks you for your comment.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

The SDT thanks you for your comment.

Richard Jackson - U.S. Bureau of Reclamation - 1,5

Answer

Document Name

Comment

<p>Reclamation appreciates the SDT’s efforts to incorporate the NIST Framework into the NERC Standards. Reclamation encourages the SDT to continue this practice to ensure that NERC standards do not duplicate requirements contained within the NIST Framework.</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your comment. The SDT has noted the recommendation.</p>	
<p>Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3</p>	
Answer	
Document Name	
Comment	
<p>BHE requests the words “and timeframes [keep the “to”] authorize,” be removed from the Technical Rationale, page 5: “The language allows entities to define how and where vendor electronic remote access occurs and the ideal methods and timeframes to authorize, establish, and disable vendor electronic remote access.” BHE is concerned this reference to timeframes and authorization could lead Regional Entities to question both, when neither appear in the 6.1 obligation to determine access.</p> <p>BHE also recommends for Attachment 2, Section 6.3, to lowercase “Intrusion Detection System/Intrusion Prevention System” since it’s not a glossary term and not a formal name.</p> <p>Thanks to the SDT for the fine work on this standard.</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your comments.</p>	

The Technical Rationale is intended to help industry to understand the technology and technical elements in the Reliability Standard. The SDT would like to emphasize that Regional Entities are required to assess compliance based on the language of the Reliability Standard and the facts and circumstances presented.

Though not NERC defined terms, Intrusion Detection System and Intrusion Prevention System (and associated acronyms) are commonly used and understood in their capitalized form. For this reason, the SDT will not be editing them to be lowercase at this time.

Jesus Sammy Alcaraz - Imperial Irrigation District - 1

Answer

Document Name

Comment

With the consideration of the FERC NOPR. Additional architecture diagrams should be illustrated for a possible IDS/IPS implementation similar to when EAC under section 3, there was guidance architecture diagrams.

Likes 0

Dislikes 0

Response

Thank you for your response. The SDT is unable to consider FERC NOPRs in comment stage. The SDT encourages entities to engage with FERC directly on this NOPR F via appropriate stakeholder consultation opportunities.

Steven Rueckert - Western Electricity Coordinating Council - 10

Answer

Document Name

Comment

None. Thank you for the opportunity to comment.

Likes 0

Dislikes	0
Response	
The SDT thanks you for your comment.	
Gail Golden - Entergy - Entergy Services, Inc. - 5	
Answer	
Document Name	
Comment	
Is the intent of this section to not include dial-up? If so, it would be better to clarify in the language.	
Likes	0
Dislikes	0
Response	
Thank you for comment. The scope of CIP-003-X Section 6 is limited by the access condition outlined in Section 3.1 of Attachment 1. Based on this scope limitation dial-up is not included.	
Carl Pineault - Hydro-Quebec Production - 1,5	
Answer	
Document Name	
Comment	
we requested redline to last approved. SMEs need to see red lines to the currently effective standard, to adequately review the proposed changes. Without this red line, the review is very challenging and may reduce the chances for approval.	
Request consistency the Attachment 1 Section 6 terms. The current language requires a plan, a process, processes, and methods but evaluates compliance based on security controls. 1) CIP-003 R2 states "shall implement one or more documented cyber security plan(s)"; 2) Attachment 1 Section 6 first says "shall implement a process" and then says "These processes shall include"; 3) Section 6.1 – 6.3 each	

require “One or more methods”; and 4) The VSL for R2 states: “but failed to implement vendor electronic remote access security controls according to Requirement R2, Attachment 1, Section 6.”

Recommend consistency between Attachment 1, Section 6 and other Attachment 1 Sections by changing “process” to “plan.” Suggest changing from “For assets containing low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible Entity shall implement a process to mitigate risks associated with electronic vendor electronic remote access, where such access has been established under Section 3.1. These processes shall include:” to “For assets containing low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible Entity shall implement one of more plans to mitigate risks associated with electronic vendor electronic remote access, where such access has been established under Section 3.1. These plans shall include:”

Request clarification on how a new Low Impact Requirement can be a higher bar than the corresponding High / Medium Impact Requirements. The equivalent requirement to Section 6.3, for high and medium impact, is CIP-005-7 R1.5 which is only applicable to high impact BCS and medium impact BCS at a Control Center. The existing 6.3 would require a low impact control that is not required for medium impact that is not at a Control Center.

Request clarification on Attachment 1 Section 6.3. Why a Low Requirement has a larger scope than the corresponding Medium Requirement (CIP-005 R1.6) The proposed Requirement for CIP-005 R1.6 says “detecting known or suspected malicious Internet Protocol (IP) communications entering or leaving an ESP.” 6.3 says “One or more method(s) for detecting known or suspected inbound and outbound malicious communications.” 6.3 applies to all vendor communications, not just IP. Next CIP-005 R1.6’s Applicable Systems says “Medium impact BCS at Control Centers” 6.3 applies to all vendor communications, not just Control Centers.

Request clarification on why Attachment 1, 6.3 does not use the phrase “vendor electronic remote access” while Section 6 and, 6.1 and 6.2 use this phrase. While in the parent language, we request consistency among 6.1, 6.2 and 6.3.

Likes	0
Dislikes	0

Response

Thank you for your comment. The SDT posts redline to last approved on the final ballot. Additionally, please see the SDT response to Utility Services, Inc. and the SDT summary responses which address your additional concerns.

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer	
Document Name	
Comment	
<p>The NAGF requests the SDT to consider adding language in Attachment 2 Section 6.3 to clarify that documentation of vendor contractual agreements to maintain malicious communication security controls would be an appropriate approach to meet compliance with Attachment 1 Section 6.3.</p>	
Likes 0	
Dislikes 0	
Response	
<p>Thank you for your comment. Per Chapter 3 of the NERC ERO Enterprise Registration Procedure, A registered entity may delegate the performance of a task to another entity, including a non-registered party, using a third-party agreement. However, the registered entity may not delegate its responsibility for ensuring the task is completed. In all cases, NERC and the REs will hold the registered entity accountable for compliance responsibilities and violations thereof. Third-party written agreements are determined on a case-by-case basis between the registered entity and the third-party NERC Compliance is the responsibility of the Registered Entity and cannot be outsourced to a third-party vendor.</p>	
Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF	
Answer	
Document Name	
Comment	
<p>Like NAGF, Duke Energy asks the Standard Drafting Team to consider adding language in Attachment 2 Section 6 Part 3 to explicitly clarify that documentation of vendor contractual agreements to maintain malicious communication security controls could be an approach to comply with Attachment 1 Section 6.3. Without this addition, compliance with the revisions could be challenging for OEM connections, given that many vendors consider their communications with covered equipment to be proprierty information or intellectual property that they are not willing to have inspected.</p>	

We also recommend that the Drafting Team reconsider the one example in Attachment 2 Section 6 Part 3 where it says “anti-malware technologies e.g. full packet inspection.” We would either like to see the one example taken away, or more added, since one example could imply one best option.

Likes 0

Dislikes 0

Response

Thank you for your comment. Per Chapter 3 of the NERC ERO Enterprise Registration Procedure, A registered entity may delegate the performance of a task to another entity, including a non-registered party, using a third-party agreement. However, the registered entity may not delegate its responsibility for ensuring the task is completed. In all cases, NERC and the REs will hold the registered entity accountable for compliance responsibilities and violations thereof. Third-party written agreements are determined on a case-by-case basis between the registered entity and the third-party NERC Compliance is the responsibility of the Registered Entity and cannot be outsourced to a third-party vendor.

The SDT encourages entities to review Chapter 3 of the NERC ERO Enterprise Registration Procedure and work with vendors to update commercial agreements such that the entity is able to procure the required evidence to fulfil their compliance requirements. The SDT has included a revised implementation plan of 36 months, in part to accommodate for these potential commercial contract complexities.

The example of 'full packet inspection' has been removed. The SDT would like to reinforce the message that the examples included in Attachment 2 are not intended to dictate appropriate compliance evidence nor are they intended to limit an entity in determining what evidence they provide.

Jodirah Green - ACES Power Marketing - 6, Group Name ACES Standard Collaborations

Answer

Document Name

Comment

We would like to thank the SDT for their efforts and allowing the industry to participate in the drafting process

Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment.	
Brian Evans-Mongeon - Utility Services, Inc. - 4	
Answer	
Document Name	
Comment	
<p>Section 6 states “the Responsible Entity shall implement a process”while CIP-003-X R2, for which Section 6 is dependent, requires the implementation of a plan. The second paragraph in Attachment 1 states “Responsible Entities with multiple-impact BES Cyber Systems ratings can utilize policies, procedures, and processes for their high or medium impact BES Cyber Systems to fulfill the sections for the development of low impact cyber security plan(s).” Additionally, Attachment 2, Section 6 states “For Section 6.3, documentation showing implementation of processes or technologies”. The VSL related to Section 6 only references a “plan”. Suggest removing the requirement to use a “process” from Attachment 1 section 6. Additionally, suggest that the language of Attachment 1 Section 6 and Attachment 2 section 6 and the VSLs be consistent.</p> <p>The Technical Rational document, page 6, par. 3 states “The objective of Attachment 1 Section 6.1 is for entities to determine vendor electronic remote access to their low impact BES Asset(s) and/or BES Cyber Systems.” Request that the “their low impact BES Asset(s) and/or” be struck. The inclusion of these words brings non-BCS into scope.</p>	
Likes	0
Dislikes	0
Response	
Thank you for your comment. The SDT use of the word 'process' in Attachment 1 Section 6 reflects the requirement to document and implement a set of required instructions specific to the Responsible Entity and to achieve the specified outcomes in Section 6.1 thru 6.3. These processes should be documented as part of the overall CIP-003-X R2 requirement to implement one or more documented cyber security plan(s) for its low impact BES Cyber Systems.	

Per the background provided in the currently approved CIP-003-7 standard, the term process does not imply any naming or approval structure beyond what is stated in the requirements. An entity should include as much as it believes necessary in its documented processes, but it must address the applicable requirements. The terms program and plan are sometimes used in place of documented processes where it makes sense and is commonly understood.

The SDT appreciates that the VSL related to R2 Attachment 1, Section 6 and has updated the term from 'plan' to 'processes'

Consistent with the rest of CIP-003, the SDT has revised the wording in the technical rationale to only refer to BES Cyber Systems.

Jose Avendano Mora - Edison International - Southern California Edison Company - 1

Answer	
Document Name	
Comment	
See comments submitted by the Edison Electric Institute	
Likes 0	
Dislikes 0	

Response

The SDT thanks you for your comment, please see response to EEI.

Romel Aquino - Edison International - Southern California Edison Company - 3

Answer	
Document Name	
Comment	

See comments submitted by the Edison Electric Institute	
Likes	0
Dislikes	0
Response	
The SDT thanks you for your comment, please see response to EEI.	
David Jendras - Ameren - Ameren Services - 3	
Answer	
Document Name	
Comment	
Ameren would like more clarification on what is considered malicious activity. In Attachment 1 Section 6, Ameren believes that 6.2 and 6.3 should be switched because the determination to disable the vendor's access would be made after suspicious communication has been detected.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. The SDT believes that the term malicious activity is a common used and understood industry term. The SDT feels that the provision of case studies or examples of malicious activity would quickly become outdated. The SDT encourages entities to utilize other more current sources of information to remain current on the ever-evolving threat landscape. Examples include, but are not limited to: E-ISAC, CISA, ERO Reliability Risk Priorities Report, NERC Low Impact White Paper (currently in draft).	
The order of the CIP-003-X Section 6 requirements does not reflect the order in which entities may be required to perform these tasks. It is possible that an entity may disable vendor electronic remote access in absence of a detection of suspected inbound and/or outbound malicious communications.	

Daniel Gacek - Exelon - 1	
Answer	
Document Name	
Comment	
Exelon is aligning with EEI in response to this question.	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment, please see response to EEI.	
Mark Ciufu - Mark Ciufu On Behalf of: Payam Farahbakhsh, Hydro One Networks, Inc., 3, 1; - Mark Ciufu	
Answer	
Document Name	
Comment	
Suggest to restrict to scope of section 6.3 to Asset contacting a Low Impact BCS at a control center or remove the section 6.3 sub requirement entirely. The rationale is the low impact BCS should not have a higher requirement that medium impact. Alternatively, include the detection of known/suspected inbound and outbound malicious communication requirement in Medium Impact BCS that is not control center, since the justification of using Intermediate system and multifactor authentication (CIP-005 IRA requirements) as a risk mitigation does not cover system to system communications from/to vendors.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see the SDT summary response related to this concern.	

Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5	
Answer	
Document Name	
Comment	
<p>Once again, we requested redline to last approved. SMEs need to see red lines to the currently effective standard, to adequately review the proposed changes. Without this red line, the review is very challenging and may reduce the chances for approval.</p> <p>Request consistency the Attachment 1 Section 6 terms. The current language requires a plan, a process, processes, and methods but evaluates compliance based on security controls. 1) CIP-003 R2 states "shall implement one or more documented cyber security plan(s)"; 2) Attachment 1 Section 6 first says "shall implement a process" and then says "These processes shall include"; 3) Section 6.1 – 6.3 each require "One or more methods"; and 4) The VSL for R2 states: "but failed to implement vendor electronic remote access security controls according to Requirement R2, Attachment 1, Section 6."</p> <p>Recommend consistency between Attachment 1, Section 6 and other Attachment 1 Sections by changing "process" to "plan." Suggest changing from "For assets containing low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible Entity shall implement a process to mitigate risks associated with electronic vendor electronic remote access, where such access has been established under Section 3.1. These processes shall include:" to "For assets containing low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible Entity shall implement one of more plans to mitigate risks associated with electronic vendor electronic remote access, where such access has been established under Section 3.1. These plans shall include:"</p> <p>Request clarification on how a new Low Impact Requirement can be a higher bar than the corresponding High / Medium Impact Requirements. The equivalent requirement to Section 6.3, for high and medium impact, is CIP-005-7 R1.5 which is only applicable to high impact BCS and medium impact BCS at a Control Center. The existing 6.3 would require a low impact control that is not required for medium impact that is not at a Control Center.</p> <p>Request clarification on Attachment 1 Section 6.3. Why a Low Requirement has a larger scope than the corresponding Medium Requirement (CIP-005 R1.6) The proposed Requirement for CIP-005 R1.6 says "detecting known or suspected malicious Internet Protocol (IP) communications entering or leaving an ESP." 6.3 says "One or more method(s) for detecting known or suspected inbound and</p>	

outbound malicious communications.” 6.3 applies to all vendor communications, not just IP. Next CIP-005 R1.6’s Applicable Systems says “Medium impact BCS at Control Centers” 6.3 applies to all vendor communications, not just Control Centers.

Request clarification on why Attachment 1, 6.3 does not use the phrase “vendor electronic remote access” while Section 6 and, 6.1 and 6.2 use this phrase. While in the parent language, we request consistency among 6.1, 6.2 and 6.3.

Likes 0

Dislikes 0

Response

Thank you for your comment. The SDT posts redline to last approved on the final ballot.

The SDT use of the word 'process' in Attachment 1 Section 6 reflects the requirement to document and implement a set of required instructions specific to the Responsible Entity and to achieve the specified outcomes in Section 6.1 thru 6.3. These processes should be documented as part of the overall CIP-003-X R2 requirement to implement one or more documented cyber security plan(s) for its low impact BES Cyber Systems.

Per the background provided in the currently approved CIP-003-7 standard, the term process does not imply any naming or approval structure beyond what is stated in the requirements. An entity should include as much as it believes necessary in its documented processes, but it must address the applicable requirements. The terms program and plan are sometimes used in place of documented processes where it makes sense and is commonly understood.

Please see SDT summary comments that address the concern that low impact controls outlined in CIP-003-X Section 6.3 are higher than high and medium impact controls required in CIP-005

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee

Answer

Document Name

Comment

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Likes 0

Dislikes	0
Response	
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<p>Paul Haase - Paul Haase On Behalf of: Hao Li, Seattle City Light, 4, 5, 3, 6, 1; - Paul Haase, Group Name Seattle City Light</p>	
Answer	
Document Name	
Comment	
<p>Seattle City Light abstains</p>	
Likes	0
Dislikes	0
Response	

The SDT thanks you for your comment.	
Russell Noble - Cowlitz County PUD - 3	
Answer	
Document Name	
Comment	
See comments as supplied by Deanna Carlson from Cowlitz PUD.	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment, please see summary response.	
Deanna Carlson - Cowlitz County PUD - 5	
Answer	
Document Name	
Comment	
There should be additional clarification on Attachment 1 Section 6.3. It appears that Low Requirement has a larger scope than the corresponding Medium Requirement. As written, Section 6.3 applies to all vendor communications.	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment, please see summary response.	
Kenya Streeter - Edison International - Southern California Edison Company - 1,3,5,6	

Answer	
Document Name	
Comment	
See comments submitted by the Edison Electric Institute	
Likes 0	
Dislikes 0	
Response	
The SDT thanks you for your comment, please see response to EEI.	

End of Report