Unofficial Comment Form

Project 2014-04 Physical Security

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=eadf3b48bac34147b5af8b5d850171ad) to submit comments on the draft CIP-014-1 Reliability Standard. The electronic comment form must be completed by 8:00 p.m. ET on **January 13, 2015.**

If you have questions please contact Stephen Crutchfield via email or by telephone at [stephen.crutchfield@nerc.net](mailto:steven.noess@nerc.net) or 609-651-9455.

The project page may be accessed by [clicking here](http://www.nerc.com/pa/Stand/Pages/Project-2014-04-Physical-Security-CIP-014-2.aspx).

## Background Information

In Order No. 802 (final order on CIP-014-1 – Physical Security), issued on November 20, 2014, FERC directed NERC to remove the term “widespread” from Reliability Standard CIP-014-1 or, alternatively, to propose modifications to the Reliability Standard that address the Commission’s concerns. FERC directed that NERC submit a responsive modification within six months from the effective date of this final rule.

FERC noted that incorporating the undefined term “widespread” in Reliability Standard CIP-014-1 introduces excessive uncertainty in identifying critical facilities under Requirement R1. As the Commission stated in the March 7 Order, only an instability that has a “critical impact on the operation of the interconnection” warrants finding that the facility causing the instability is critical under Requirement R1. The March 7 Order did not intend to suggest that the physical security Reliability Standards should address facilities that do not have a “critical impact on the operation of the interconnection.” This understanding is, we believe, unintentionally absent in Requirement R1 because the requirement only deems a facility critical when, if rendered inoperable or damaged, it could result in widespread instability, uncontrolled separation, or Cascading within an Interconnection. The definition in Requirement R1 should not be dependent on how an applicable entity interprets the term “widespread” but instead should be modified to make clear that a facility that has a critical impact on the operation of an Interconnection is critical and therefore subject to Requirement R1.

You do not have to answer all questions below. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained. Due to the expected volume of comments, the SDT asks that commenters consider consolidating responses and endorsing comments provided by another.

## Questions

1. The SAR for Project 2014-04 (the original project for the CIP-014-1, Physical Security standard) was revised to adderss the directive from FERC to to remove the term “widespread” from Reliability Standard CIP-014-1 or, alternatively, to propose modifications to the Reliability Standard that address the Commission’s concerns. Do you agree with the proposed revisions to the SAR? If not, please provide specific comments regarding the SAR.

Yes

No

Comments: