Unofficial Comment Form

Project 2016-02 Modifications to CIP Standards

Virtualization - Draft 3

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on the **CIP Virtualization suite of Standards** by **8 p.m. Eastern, Monday, April 4, 2022.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project%202016-02%20Modifications%20to%20CIP%20Standards.aspx). If you have questions, contact Senior Standards Developer, Jordan Mallory (via email) or at 404-446-2589.

## Background Information

Project 2016-02 (1) addresses the Federal Energy Regulatory Commission (Commission) directives contained in Order No. 822 and (2) considers the Version 5 Transition Advisory Group (V5TAG) issues identified in the CIP V5 Issues for Standard Drafting Team Consideration (V5TAG Transfer Document).

The V5TAG, which consisted of representatives from NERC, Regional Entities, and industry stakeholders, was formed to issue guidance regarding possible methods to achieve compliance with the CIP Version 5 standards and to support industry’s implementation activities. During the V5TAG’s activities, it identified certain issues with the CIP Reliability Standards that would be better addressed by a standard drafting team (SDT) for the CIP Reliability Standards. The V5TAG developed the [CIP Version 5 Transition Advisory Group Issues for Consideration](http://www.nerc.com/pa/Stand/Project%20201602%20Modifications%20to%20CIP%20Standards%20DL/Transfer_Issues_V5TAG-SDT_1st-final-03232016.pdf) document to formally recommend that the SDT address these issues and consider modifications to the standard language during the standards development process. Among other issues, the V5TAG stated “The CIP Version 5 standards comments.

## Summary of Changes Overview

The SDT reviewed all comments and made modifications to the Reliability Standards and Definitions accordingly. Below are questions for which the SDT is seeking industry input. In order to allow the SDT to sort comments received by topic, the SDT respectfully requests comments be submitted with the respective question topic. The SDT thanks all stakeholders for your time and responses during this comment period.

## Questions

1. The SDT has redefined Shared Cyber Infrastructure (SCI) such that it now focuses on cyber infrastructure that shares its hardware resources among VCAs of different impact levels only, which then subjects the SCI to additional requirements. Virtualization infrastructure that only hosts VCAs or associated VCAs of the same impact level is no longer SCI and requires no recategorization from current state. The SDT also removed the SCI identification changes from CIP-002. The SDT believes this greatly simplifies SCI. Do you agree with the proposed change? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT has reinstated the currently approved ESP definition and appended language to allow for zero trust models. Do you agree with the proposed change? If not, please provide the basis for your disagreement and an alternate proposal. Please also include any comments on the proposed EAP definition in the response to this question.

[ ]  Yes

[ ]  No

Comments:

1. The SDT modified the ERC definition from the “outside the asset containing” reference point in the previous draft back to an ESP reference point. Do you agree with the proposed change? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT has modified the IRA definition to simplify it, primarily in regards to the routable protocol to serial conversion scenario. Do you agree with the proposed change? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT modified the VCA definition primarily to include the ability to host them on numerous asset types other than SCI. This allows for current state, where entities consider hypervisors as BCA, EACMS, etc. Do you agree with the proposed change? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT modified numerous other glossary terms. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT revised CIP-005 based on industry comments. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT revised CIP-007 based on industry comments. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT revised CIP-010 R1 to focus on defining change, authorizing change, and verifying that CIP-005 and CIP-007 related security controls are not affected by changes. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT made other revisions to CIP-010 based on industry comments. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT revised CIP-003, CIP-004, CIP-006, CIP-008, CIP-009, CIP-011, and CIP-013 mostly with conforming changes. Do you agree with the proposed changes to these Reliability Standards? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT has revised numerous VSL’s for simplification. Do you agree with the proposed changes? If not, please provide the basis for your disagreement.

[ ]  Yes

[ ]  No

Comments:

1. The SDT has revised the Implementation Plan to include the Planned and Unplanned Changes provisions and to allow for early adoption. Do you agree with the proposed Implementation Plan? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. Please provide any additional comments for the drafting team to consider, if desired.