Unofficial Comment Form

Project 2016-02 Modifications to CIP Standards
Glossary of Terms Used in NERC Reliability Standards – Control Center

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Project 2016-02 Modifications to NERC Glossary of Terms Used in Reliability Standards – Control Center.** Comments must be submitted by **8 p.m. Eastern, Monday, April 30, 2018.
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 Jordan Mallory at (404) 446-2589 or Mat Bunch at (404) 446-9785.

## Background Information

On January 21, 2016, the Federal Energy Regulatory Commission (FERC) issued [Order No. 822](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Order%20Approving%20Revised%20CIP%20Reliability%20Standards.pdf), which approved revisions to the cybersecurity Critical Infrastructure Protection (CIP) standards and directed NERC to develop certain modifications to requirements in the CIP standards. Specifically, FERC directed NERC to “develop modifications to the CIP Reliability Standards to require responsible entities to implement controls to protect, at a minimum, communication links and sensitive bulk electric system data communicated between bulk electric system Control Centers in a manner that is appropriately tailored to address the risks posed to the bulk electric system by the assets being protected (i.e., high, medium, or low impact).”

The Project 2016-02 Standard Drafting Team (SDT) developed proposed Reliability Standard CIP-012-1 to require Responsible Entities to implement controls to protect sensitive Bulk Electric System (BES) data or communications links between BES Control Centers and made the standard applicable to all impact levels due to the sensitivity of the data being communicated. As the FERC directive addressed the protection of data communicated between Control Centers, the SDT evaluated the current Control Center definition and identified the following opportunities for clarification:

* The term, “operating personnel”is not a NERC Glossary defined term and may be misinterpreted;
* The phrase, “two or more locations” may be overbroad;
* The phrase, “monitor and control” may be misinterpreted;
* The SDT members considered both the NERC Glossary defined term “Real-time” and undefined term “real-time.”

To address the issues identified above, the SDT developed proposed modifications to the Control Center definition to make specific inclusions and exclusions. This model was based on the approach of the BES definition which also has specific inclusions and exclusions.

**Current Control Center Definition:**

One or more facilities hosting operating personnel that monitor and control the Bulk Electric System (BES) in real-time to perform the reliability tasks, including their associated data centers, of: 1) a Reliability Coordinator, 2) a Balancing Authority, 3) a Transmission Operator for transmission Facilities at two or more locations, or 4) a Generator Operator for generation Facilities at two or more locations.

**Proposed Revised Control Center Definition:**

One or more facilities, including their associated data centers, that monitor and control the Bulk Electric System (BES) and also host operating personnel who:

1. perform the Real-time reliability-related tasks of a Reliability Coordinator; or
2. perform the Real-time reliability-related tasks of a Balancing Authority; or
3. perform the Real-time reliability-related tasks of a Transmission Operator for Transmission Facilities at two or more locations; or
4. can act independently as the Generator Operator to develop specific dispatch instructions for generation Facilities at two or more locations; or
5. can operate or direct the operation of a Transmission Owner’s BES Transmission Facilities in Real-time.

Operating personnel do not include:

1. plant operators located at a generator plant site or personnel at a centrally located dispatch center who relay dispatch instructions without making any modifications; or
2. Transmission Owner or Transmission Operator field switching personnel.

**Proposed Revised Redline Control Center Definition:**

One or more facilities, including their associated data centers, that monitor and control the Bulk Electric System (BES) and also host operating personnel who:

1. perform the Real-time reliability tasks of a Reliability Coordinator’ or
2. perform the Real-time reliability tasks of a Balancing Authority; or
3. perform the Real-time reliability tasks of a Transmission Operator for Transmission Facilities at two or more locations; or
4. can act independently as the Generator Operator to develop specific dispatch instructions for generation Facilities at two or more locations; or
5. can operate or direct the operation of a Transmission Owner’s BES Transmission Facilities in Real-time.

Operating personnel do not include:

1. plant operators located at a generator plant site or personnel at a centrally located dispatch center who relay dispatch instructions without making any modifications; or
2. Transmission Owner or Transmission Operator field switching personnel.

Questions

1. Control Center definition: Do you agree with the proposed revisions to the definition of Control Center? If not, please provide rationale or propose an alternative definition.

[ ]  Yes

[ ]  No

Comments:

1. Control Center definition: Do the proposed revisions to the Control Center definition change the scope or intent of any current or pending Reliability Standard(s) using the defined term (examples include Reliability Standards: COM-001-3; TOP-001-4; and IRO-002-5)? If yes, provide details of the affected Reliability Standard(s), requirements, and any anticipated impact.

[ ]  Yes

[ ]  No

Comments:

1. Control Center definition: The SDT contends that there will be no change in BES Cyber System categorization by clarifying the definition of Control Center. This assertion is based on SDT review of the CIP-002-5.1a criteria and its understanding of BES Cyber System categorization through experience implementing CIP-002-5.1a. Do you agree with this assertion? If not, please provide rationale and practical examples of where a change in categorization will occur as a result of this modification.

[ ]  Yes

[ ]  No

Comments:

1. Control Center definition: Is there a scenario where a Control Center hosts both the inclusion personnel and the exclusion personnel? If yes, please provide them here.

[ ]  Yes

[ ]  No

Comments:

1. Implementation Plan: The new Control Center definition will become effective on the first day of the first calendar quarter that is three (3) calendar months after the effective date of the applicable governmental authority’s order approving the term, or as otherwise provided for by the applicable governmental authority. Do you agree that three calendar months is enough time to update documentation? If you do not agree, please provide the amount of time needed and types of actions that will need to be completed during this time.

[ ]  Yes

[ ]  No

Comments: