Unofficial Comment Form

Project 2016-02 Modifications to CIP Standards

Transmission Owner (TO) Control Center (TOCC) Performing Transmission Operator (TOP) Obligations

**Do not** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments
on the **Transmission Owner Control Center performing Transmission Operator obligations**. The electronic form must be submitted by **8 p.m. Eastern, Tuesday, April 11, 2017**. **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 Al McMeekin (via email) or at (404) 446-9675.

## Background Information

The purpose of Project 2016-02 is to (1) consider the Version 5 Transition Advisory Group (V5TAG) issues identified in the CIP V5 Issues for Standard Drafting Team Consideration (V5TAG Transfer Document) and (2) address the Federal Energy Regulatory Commission (Commission) directives contained in Order No. 822. These revisions will increase reliability and security to the Bulk-Power System (BPS) by enhancing cyber protection of BPS facilities.

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 V5 standards and to support industry’s implementation activities. During the course of the V5TAG’s activities, the V5TAG identified certain issues with the CIP Reliability Standards that were more appropriately addressed by the existing standard drafting team (SDT) for the CIP Reliability Standards. The V5TAG developed the V5TAG Transfer Document to formally recommend that the SDT address these issues during the standards development process and to consider whether modifications can be made to the standard language.

Among other things, due to the confusion of the application of the phrase “used to perform the functional obligation of” in CIP-002-5.1a, Attachment 1, criterion 2.12, the V5TAG recommended clarification of:

* The applicability of requirements on a TO Control Center that performs the functional obligations of a TOP, particularly if the TO has the ability to operate switches, breakers and relays in the BES.
* The definition of Control Center.
* The language scope of “perform the functional obligations of” throughout the Attachment 1 criteria.

This issue was included in the SAR for Project 2016-02 as follows:

* Identify items to be addressed to provide additional clarity and revisions to CIP-002-5.1a Attachment 1. TO Control Centers, specifically around performing the functional obligations of a TOP for small or lower-risk entities should be addressed.
* Clarify the applicability of requirements on a TO Control Center that perform the functional obligations of a TOP, particularly if the TO has the ability to operate switches, breakers and relays in the BES. CIP-002-5.1a indicates that any Control Center performing the actions noted above is to be considered a medium risk asset if not already identified as a high. There is no allowance for an entity performing such functions to identify their BES Cyber System(s) as low impact.
* If necessary and appropriate, the definition of Control Center may need to be revised to provide the additional clarity needed.

The purpose of this comment form is solicit stakeholder feedback to gather input on the V5TAG issue related to TO Control Centers performing TOP obligations to aid the SDT’s consideration of this issue. For a discussion of this issue, please reference the associated [TOCC White Paper](http://www.nerc.com/pa/Stand/Project%20201602%20Modifications%20to%20CIP%20Standards%20DL/2016-02_CIP_TOCC_Whitepaper_03142017.pdf) drafted by the SDT that outlines the background and technical consideration on this issue as well as approaches the SDT is considering to address this issue.

## Questions

1. Do you agree with the assertions outlined in the TOCC White Paper (page 8) regarding capability versus authority? Please provide your rationale to support your opinion.

[ ]  Yes

[ ]  No

Comments:

1. Do Transmission Owner(s) that have the capability to perform the functional obligations of Transmission Operator(s) present risk(s) to the reliability of the BES significant enough that the Transmission Owner(s) associated Control Center(s) should be designated as medium or high impact? Please provide your rationale including specific practices that may mitigate risks.

[ ]  Yes

[ ]  No

Comments:

1. The Project 2008-06 SDT (706 SDT) included the phrase “used to perform the functional obligation of” to provide protection to BES Cyber System(s) that may be misused and impact the BES regardless of which functional entity operates those BES Cyber Systems. For criterion 2.12 in CIP-002-5.1a Attachment 1, does the intent of the “perform functional obligation of” language require additional guidance or clarity? If you believe additional clarity is needed, please provide suggestions and alternatives as well as support for your positions.

[ ]  Yes

[ ]  No

Comments:

1. Should the SDT revise the Control Center definition to address the TOCC issue? Please provide rationale to support your position and suggested options or language for consideration.

[ ]  Yes

[ ]  No

Comments:

1. The SDT is evaluating options to address the TOCC issue, as described in the TOCC White Paper. Please identify options or propose solutions your entity would support and provide rationale for your position. (See **Evaluation of Potential Solutions** beginning on page 9 of the TOCC White Paper for additional context and discussion.)

Comments:

1. If you support criteria development in CIP-002-5.1a, Attachment 1 to solve the TOCC issue, does your entity agree with the criteria as described in the TOCC White Paper (page 9, subsection **1a.** **Propose revisions to CIP-002-5.1a, Attachment 1, Criterion 2.12**)? Please provide rationale in the form of detailed technical justification for each criterion you support or alternative criteria and technical justification to support your response.

[ ]  Yes

[ ]  No

Comments:

1. Should the considerations proposed for lower risk Transmission Owner Control Centers also be afforded to lower risk Transmission Operator Control Centers? Please provide rationale to support your response.

[ ]  Yes

[ ]  No

Comments:

1. If you have additional comments on the TOCC issue or proposed approaches that you have not provided in response to the questions above, please provide them here.

Comments: