

Comment Report

Project Name: 2016-02 Modifications to CIP Standards | CIP-003-8
Comment Period Start Date: 8/23/2018
Comment Period End Date: 10/9/2018
Associated Ballots: 2016-02 Modifications to CIP Standards CIP-003-8 Draft 1 IN 1 ST

There were 50 sets of responses, including comments from approximately 131 different people from approximately 92 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

- 1. Requirement R2, Attachment 1, Section 5.2:** In response to the directive in FERC Order 843, the SDT modified Attachment 1, Section 5.2 adding subsection 5.2.2 to state: “For any method used pursuant to 5.2.1, Responsible Entities shall determine whether any additional mitigation actions are necessary and implement such actions prior to connecting the Transient Cyber Asset.” Do you agree with this revision? If not, please provide the basis for your disagreement and an alternate proposal.
- 2. Guidelines and Technical Basis:** The SDT made changes to the Guidelines and Technical Basis section of the Standard to conform with the modifications it made to Attachment 1, Section 5.2. Do you agree with these changes to the Guidelines and Technical Basis? If not, please provide the basis for your disagreement and an alternate proposal. (The CIP SDT is aware that another initiative is underway to convert all GTB sections to Technical Rationale documents. This effort is outside the scope of this SDT.)
- 3. Implementation Plan:** The SDT established the Implementation Plan to make the standard effective the later of (1) January 1, 2020, or (2) the first day of the first calendar quarter that is six (6) calendar months after the effective date of the applicable governmental authority’s order approving the standard, or as otherwise provided for by the applicable governmental authority. Do you agree with this proposal? If you think an alternate effective date is needed, please provide a detailed explanation of actions and time needed.
- 4. The SDT believes proposed modifications in CIP-003-8 provide entities with flexibility to meet the reliability objectives 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.**

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Santee Cooper	Chris Wagner	1		Santee Cooper	Rene' Free	Santee Cooper	1,3,5,6	SERC
					Rodger Blakely	Santee Cooper	1,3,5,6	SERC
					Troy Lee	Santee Cooper	1,3,5,6	SERC
					Jennifer Richards	Santee Cooper	1,3,5,6	SERC
					Chris Jimenez	Santee Cooper	1,3,5,6	SERC
Duke Energy	Colby Bellville	1,3,5,6	FRCC,RF,SERC	Duke Energy	Doug Hils	Duke Energy	1	RF
					Lee Schuster	Duke Energy	3	FRCC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
MRO	Dana Klem	1,2,3,4,5,6	MRO	MRO NSRF	Joseph DePoorter	Madison Gas & Electric	3,4,5,6	MRO
					Larry Heckert	Alliant Energy	4	MRO
					Amy Casucelli	Xcel Energy	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jodi Jensen	Western Area Power Administration	1,6	MRO
					Kayleigh Wilkerson	Lincoln Electric System	1,3,5,6	MRO
					Mahmood Safi	Omaha Public Power District	1,3,5,6	MRO
					Brad Parret	Minnesota Power	1,5	MRO
					Terry Harbour	MidAmerican Energy Company	1,3	MRO
					Tom Breene	Wisconsin Public Service Corporation	3,5,6	MRO

					Jeremy Voll	Basin Electric Power Cooperative	1	MRO
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Mike Morrow	Midcontinent ISO	2	MRO
PPL - Louisville Gas and Electric Co.	Devin Shines	1,3,5,6	RF,SERC	PPL NERC Registered Affiliates	Brenda Truhe	PPL Electric Utilities Corporation	1	RF
					Charles Freibert	PPL - Louisville Gas and Electric Co.	3	SERC
					JULIE HOSTRANDER	PPL - Louisville Gas and Electric Co.	5	SERC
					Linn Oelker	PPL - Louisville Gas and Electric Co.	6	SERC
ACES Power Marketing	Jodirah Green	6	NA - Not Applicable	ACES Standard Collaborations	Shari Heino	Brazos Electric Power Cooperative, Inc.	5	Texas RE
					John Shaver	Arizona Electric Power Cooperative, Inc.	1	WECC
					Joseph Smith	Prairie Power	3	SERC
					Susan Sosbe	Wabash Valley Power Association	3	RF
					Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1	SERC
					Tara Lightner	Sunflower Electric Power Corporation	1	MRO
FirstEnergy - FirstEnergy Corporation	Julie Severino	1		FirstEnergy	Aubrey Short	FirstEnergy - FirstEnergy Corporation	4	RF

					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Ann Ivanc	FirstEnergy - FirstEnergy Solutions	6	RF
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Katherine Prewitt	Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					William D. Shultz	Southern Company Generation	5	SERC
					Jennifer G. Sykes	Southern Company Generation and Energy Marketing	6	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC no Dominion and HQ	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Wayne Sipperly	New York Power Authority	4	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					Edward Bedder	Orange & Rockland Utilities	1	NPCC

David Burke	Orange & Rockland Utilities	3	NPCC
Michele Tondalo	UI	1	NPCC
Laura Mcleod	NB Power	1	NPCC
David Ramkalawan	Ontario Power Generation Inc.	5	NPCC
Helen Lainis	IESO	2	NPCC
Michael Schiavone	National Grid	1	NPCC
Michael Jones	National Grid	3	NPCC
Michael Forte	Con Ed - Consolidated Edison	1	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Sean Cavote	PSEG	4	NPCC
Kathleen Goodman	ISO-NE	2	NPCC
Quintin Lee	Eversource Energy	1	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1,5	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Shivaz Chopra	New York Power Authority	6	NPCC
David Kiguel	Independent	NA - Not Applicable	NPCC
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC
Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
Gregory Campoli	New York Independent	2	NPCC

						System Operator		
Associated Electric Cooperative, Inc.	Todd Bennett	3		AECI	Michael Bax	Central Electric Power Cooperative (Missouri)	1	SERC
					Adam Weber	Central Electric Power Cooperative (Missouri)	3	SERC
					Stephen Pogue	M and A Electric Power Cooperative	3	SERC
					William Price	M and A Electric Power Cooperative	1	SERC
					Jeff Neas	Sho-Me Power Electric Cooperative	3	SERC
					Peter Dawson	Sho-Me Power Electric Cooperative	1	SERC
					Mark Ramsey	N.W. Electric Power Cooperative, Inc.	1	NPCC
					John Stickley	NW Electric Power Cooperative, Inc.	3	SERC
					Ted Hilmes	KAMO Electric Cooperative	3	SERC
					Walter Kenyon	KAMO Electric Cooperative	1	SERC
					Kevin White	Northeast Missouri Electric Power Cooperative	1	SERC
					Skyler Wiegmann	Northeast Missouri Electric Power Cooperative	3	SERC
Ryan Ziegler	Associated Electric Cooperative, Inc.	1	SERC					

					Brian Ackermann	Associated Electric Cooperative, Inc.	6	SERC
					Brad Haralson	Associated Electric Cooperative, Inc.	5	SERC

1. Requirement R2, Attachment 1, Section 5.2: In response to the directive in FERC Order 843, the SDT modified Attachment 1, Section 5.2 adding subsection 5.2.2 to state: “For any method used pursuant to 5.2.1, Responsible Entities shall determine whether any additional mitigation actions are necessary and implement such actions prior to connecting the Transient Cyber Asset.” Do you agree with this revision? If not, please provide the basis for your disagreement and an alternate proposal.

Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer No

Document Name

Comment

The NSRF recommends the following change for clarity to the draft 5.2.2 (added text is bracketed) “For any method used pursuant to 5.2.1, Responsible Entities shall determine whether any additional mitigation actions are necessary and[, if any,] implement such actions prior to connecting the Transient Cyber Asset.”

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

The proposed language is too vague, will not add value, and is not auditable. Reclamation recommends any changes pertaining to low impact TCA and RM should align with CIP-010 Attachment 1 and provide equal or less stringent controls for low impact BES Cyber Systems as for medium and high impact BES Cyber Systems.

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer No

Document Name

Comment

Idaho Power Company does not believe that this is an auditable approach by the way the standards are written. A Responsible Entity that believed any additional mitigation actions were necessary would implement those additional measures. Stating the requirements in this manner seems vague and lacks the auditability of a normal requirement. It would be more appropriate to have a Responsible Entity document the steps that were taken prior to allowing a third party to connect a TCA.

Likes 0

Dislikes 0

Response

Eric Ruskamp - Lincoln Electric System - 6

Answer

No

Document Name

Comment

LES supports the NSRF comments:

The NSRF recommends the following change for clarity to the draft 5.2.2 (added text is bracketed) "For any method used pursuant to 5.2.1, Responsible Entities shall determine whether any additional mitigation actions are necessary and[, if any,] implement such actions prior to connecting the Transient Cyber Asset."

Likes 0

Dislikes 0

Response

Tyson Archie - Platte River Power Authority - 5

Answer

No

Document Name

Comment

There appears to be a disconnect between the intent as noted in the Guidelines and Technical Basis and the requirement documented in CIP-003-8, Attachment 1, 5.2.2. The intent is that, "if there are deficiencies identified" then mitigation actions must be completed. The requirement does not contain the 'if then' syntax.

Consider revising 5.2.2 as follows:

If deficiencies are identified for any method used pursuant to 5.2.1, then the Responsible Entity shall implement mitigation actions to address the deficiencies prior to connecting the Transient Cyber Asset.

Consider revising CIP-003-8, Attachment 2, Section 5 (2) as follows:

Examples of evidence for Attachment 1, Section 5.2.2 may include, but are not limited to, documentation from change management systems, electronic mail, or contracts that identify mitigation actions that were implemented prior to connecting the Transient Cyber Asset managed by a party and that were implemented to address deficiencies of any method used pursuant to 5.2.1

Likes 0

Dislikes 0

Response

Larry Watt - Lakeland Electric - 1

Answer

No

Document Name

Comment

The proposed language is too vague, will not add value, and is not auditable. Reclamation recommends any changes pertaining to low impact TCA and RM should align with CIP-010 Attachment 1 and provide equal controls for low impact BES Cyber Systems as for medium and high impact BES Cyber Systems.

Likes 0

Dislikes 0

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman

Answer

No

Document Name

Comment

Please refer to comments from the MRO NERC Standards Review Forum (NSRF).

Likes 0

Dislikes 0

Response

Stephanie Burns - Stephanie Burns On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Stephanie Burns

Answer

No

Document Name

Comment

ITC is in agreement with statements made by the NSRF:

The NSRF recommends the following change for clarity to the draft 5.2.2 (added text is bracketed) "For any method used pursuant to 5.2.1, Responsible Entities shall determine whether any additional mitigation actions are necessary and[, if any,] implement such actions prior to connecting the Transient Cyber Asset."

Likes 0

Dislikes 0

Response

Andrey Komissarov - Andrey Komissarov On Behalf of: Daniel Frank, Sempra - San Diego Gas and Electric, 3, 5, 1; - Andrey Komissarov

Answer No

Document Name

Comment

The final bullet of 5.2.1 "Other method(s) to mitigate the introduction of malicious code" addresses the issue. If the entity deems it necessary to use another method, they already have this provision in place. Section 5.2.2 only confuses the matter.

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Anthony Jablonski - ReliabilityFirst - 10

Answer Yes

Document Name	
Comment	
ReliabilityFirst agrees with the proposed modification.	
Likes 0	
Dislikes 0	
Response	
Barry Lawson - National Rural Electric Cooperative Association - 4	
Answer	Yes
Document Name	
Comment	
NRECA recommends the following change for clarity to the draft 5.2.2 (added text is bracketed) "For any method used pursuant to 5.2.1, Responsible Entities shall determine whether any additional mitigation actions are necessary and[, if any,] implement such actions prior to connecting the Transient Cyber Asset."	
Likes 0	
Dislikes 0	
Response	
Lana Smith - San Miguel Electric Cooperative, Inc. - 5 - Texas RE	
Answer	Yes
Document Name	
Comment	
SMEC agrees with NRECA Comment: recommends the following change for clarity to the draft 5.2.2 (added text is bracketed) "For any method used pursuant to 5.2.1, Responsible Entities shall determine whether any additional mitigation actions are necessary and[, if any,] implement such actions prior to connecting the Transient Cyber Asset."	
Likes 0	
Dislikes 0	
Response	
Andrea Barclay - Georgia System Operations Corporation - 4	

Answer	Yes
Document Name	
Comment	
<p>Recommends the following change for clarity to the draft 5.2.2 (added text is bracketed) "For any method used pursuant to 5.2.1, Responsible Entities shall determine whether any additional mitigation actions are necessary and[, if any,] implement such actions prior to connecting the Transient Cyber Asset."</p>	
Likes	0
Dislikes	0
Response	
<p>Joe Tarantino - Joe Tarantino On Behalf of: Arthur Starkovich, Sacramento Municipal Utility District, 4, 1, 5, 6, 3; Beth Tincher, Sacramento Municipal Utility District, 4, 1, 5, 6, 3; Jamie Cutlip, Sacramento Municipal Utility District, 4, 1, 5, 6, 3; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 4, 1, 5, 6, 3; Susan Oto, Sacramento Municipal Utility District, 4, 1, 5, 6, 3; - Joe Tarantino</p>	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
<p>Chris Wagner - Santee Cooper - 1, Group Name Santee Cooper</p>	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
<p>Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates</p>	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Julie Severino - FirstEnergy - FirstEnergy Corporation - 1, Group Name FirstEnergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Leanna Lamatrice - AEP - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jeanne Kurzynowski - CMS Energy - Consumers Energy Company - 1,3,4,5 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

James Anderson - CMS Energy - Consumers Energy Company - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Vivian Vo - APS - Arizona Public Service Co. - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Salsbury - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Russell Martin II - Salt River Project - 1,3,5,6 - WECC****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Karl Blaszkowski - CMS Energy - Consumers Energy Company - 3****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Heather Morgan - EDP Renewables North America LLC - 5****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

faranak sarbaz - Los Angeles Department of Water and Power - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nicholas Lauriat - Network and Security Technologies - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Anton Vu - Los Angeles Department of Water and Power - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion and HQ

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Douglas Johnson - American Transmission Company, LLC - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tho Tran - Tho Tran On Behalf of: Lee Maurer, Oncor Electric Delivery, 1; - Tho Tran

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Eli Rivera - Central Electric Cooperative, Inc. (Redmond, Oregon) - 1 - Texas RE

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

William Sanders - Lower Colorado River Authority - 1

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; James McBee, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; - Douglas Webb	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Amber Orr - Public Utility District No. 1 of Pend Oreille County - 3	
Answer	Yes
Document Name	
Comment	
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	

Likes 0

Dislikes 0

Response

Ryan Walter - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Chris Scanlon - Exelon - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	
Document Name	
Comment	
AECI supports the comments provided by NRECA.	
Likes 0	
Dislikes 0	
Response	

2. Guidelines and Technical Basis: The SDT made changes to the Guidelines and Technical Basis section of the Standard to conform with the modifications it made to Attachment 1, Section 5.2. Do you agree with these changes to the Guidelines and Technical Basis? If not, please provide the basis for your disagreement and an alternate proposal. (The CIP SDT is aware that another initiative is underway to convert all GTB sections to Technical Rationale documents. This effort is outside the scope of this SDT.)

Stephanie Burns - Stephanie Burns On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Stephanie Burns

Answer No

Document Name

Comment

ITC is in agreement with statements made by the NSRF:

The NSRF request that the entire Guideline and Technical Basis section should be removed from the Standard as it may be interpreted as how to meet the Compliance obligations of the Requirements. FERC Order 693 section 253 states, "The most critical element of a Reliability Standard is the Requirements. As NERC explains, "the Requirements within a standard define what an entity must do to be compliant . . . [and] binds an entity to certain obligations of performance under section 215 of the FPA." This information should reside out side the Standard as a NERC Compliance Guidance document.

Likes 0

Dislikes 0

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman

Answer No

Document Name

Comment

Please refer to comments from the MRO NERC Standards Review Forum (NSRF).

Likes 0

Dislikes 0

Response

Larry Watt - Lakeland Electric - 1

Answer No

Document Name

Comment

The Guidelines and Technical Bases states contracts and vendor change management informatino would serve as evidence, but, in the experience of Lakeland Electric, providing procedural or contractual evidence does not seem to be a satisfactory evidence artifact to provide to the auditors when they are asking for evidence that a task was performed. The way it is written makes the auditability vague and subject to a lot of judgement which can create frustration for Responsible Entities if that approach is not consistent.

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer

No

Document Name

Comment

The Guidelines and Technical Bases states contracts would serve as evidence, but, in the experience of Idaho Power Company, providing procedural or contractual evidence does not seem to be a satisfactory evidence artifact to provide to the auditors when they are asking for evidence that a task was performed prior to connecting a TCA they often require something that shows a task was performed. The way it is written makes the auditability vague and subject to a lot of judgement which can create frustration for Responsible Entities if that approach is not consistent.

Likes 0

Dislikes 0

Response

Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

No

Document Name

Comment

The NSRF request that the entire Guideline and Technical Basis section should be removed from the Standard as it may be interpreted as how to meet the Compliance obligations of the Requirements. FERC Order 693 section 253 states, "The most critical element of a Reliability Standard is the Requirements. As NERC explains, "the Requirements within a standard define what an entity must do to be compliant . . . [and] binds an entity to certain obligations of performance under section 215 of the FPA." This information should reside out side the Standard as a NERC Compliance Guidance document.

Likes 0

Dislikes 0

Response

Tyson Archie - Platte River Power Authority - 5

Answer	Yes
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Document Name	
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Comment

There appears to be a disconnect between the intent as noted in the Guidelines and Technical Basis and the requirement documented in CIP-003-8, Attachment 1, 5.2.2. See Comment for Q1.

Likes 0

Dislikes 0

Response

Anthony Jablonski - ReliabilityFirst - 10

Answer	Yes
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Document Name	
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Comment

ReliabilityFirst agrees with the proposed modification.

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer	Yes
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Document Name	
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Comment

None

Likes 0

Dislikes 0

Response

Chris Scanlon - Exelon - 1

Answer	Yes
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Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ryan Walter - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
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	
Likes 0	
Dislikes 0	

Response	
Amber Orr - Public Utility District No. 1 of Pend Oreille County - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0

Response	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; James McBee, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; - Douglas Webb	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0

Response	
William Sanders - Lower Colorado River Authority - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0

Response	
Eli Rivera - Central Electric Cooperative, Inc. (Redmond, Oregon) - 1 - Texas RE	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andrey Komissarov - Andrey Komissarov On Behalf of: Daniel Frank, Sempra - San Diego Gas and Electric, 3, 5, 1; - Andrey Komissarov	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
David Jendras - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Tho Tran - Tho Tran On Behalf of: Lee Maurer, Oncor Electric Delivery, 1; - Tho Tran

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lana Smith - San Miguel Electric Cooperative, Inc. - 5 - Texas RE

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 6, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Douglas Johnson - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion and HQ

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Anton Vu - Los Angeles Department of Water and Power - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nicholas Lauriat - Network and Security Technologies - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**faranak sarbaz - Los Angeles Department of Water and Power - 1****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Heather Morgan - EDP Renewables North America LLC - 5****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Karl Blaszkowski - CMS Energy - Consumers Energy Company - 3****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Russell Martin II - Salt River Project - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Salsbury - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Vivian Vo - APS - Arizona Public Service Co. - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Eric Ruskamp - Lincoln Electric System - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

James Anderson - CMS Energy - Consumers Energy Company - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leanna Lamatrice - AEP - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Julie Severino - FirstEnergy - FirstEnergy Corporation - 1, Group Name FirstEnergy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Chris Wagner - Santee Cooper - 1, Group Name Santee Cooper

Answer Yes

Document Name

Comment

Likes	0
Dislikes	0
Response	
<p>Joe Tarantino - Joe Tarantino On Behalf of: Arthur Starkovich, Sacramento Municipal Utility District, 4, 1, 5, 6, 3; Beth Tincher, Sacramento Municipal Utility District, 4, 1, 5, 6, 3; Jamie Cutlip, Sacramento Municipal Utility District, 4, 1, 5, 6, 3; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 4, 1, 5, 6, 3; Susan Oto, Sacramento Municipal Utility District, 4, 1, 5, 6, 3; - Joe Tarantino</p>	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
<p>Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI</p>	
Answer	
Document Name	
Comment	
<p>AECI supports the comments provided by NRECA.</p>	
Likes	0
Dislikes	0
Response	

3. Implementation Plan: The SDT established the Implementation Plan to make the standard effective the later of (1) January 1, 2020, or (2) the first day of the first calendar quarter that is six (6) calendar months after the effective date of the applicable governmental authority's order approving the standard, or as otherwise provided for by the applicable governmental authority. Do you agree with this proposal? If you think an alternate effective date is needed, please provide a detailed explanation of actions and time needed.

Joe Tarantino - Joe Tarantino On Behalf of: Arthur Starkovich, Sacramento Municipal Utility District, 4, 1, 5, 6, 3; Beth Tincher, Sacramento Municipal Utility District, 4, 1, 5, 6, 3; Jamie Cutlip, Sacramento Municipal Utility District, 4, 1, 5, 6, 3; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 4, 1, 5, 6, 3; Susan Oto, Sacramento Municipal Utility District, 4, 1, 5, 6, 3; - Joe Tarantino

Answer No

Document Name

Comment

Attachment 2 Section 5 part 2 indicates that contracts must be modified. Contract may take over 6 months to modify. Consider changing the implementation to span 12 months.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Reclamation recommends CIP-003-8 become effective no earlier than 18 calendar months after the effective date of the applicable governmental authority's order approving the standard.

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 6

Answer No

Document Name

Comment

Since CIP-003-8 incorporates the same language for Planned and Unplanned Changes in Section 5, as in the proposed CIP-002-6 standard, the revised standard should become effective the first day of the first calendar quarter that is twenty-four (24) calendar months after the effective date of the applicable governmental authority's order approving the standard.

This is to allow additional needed time for entities to prepare, plan, budget, procure, and hire additional labor resources to meet all the applicable reliability standards in becoming a Medium or High Impact entity from an existing Low-Impact entity. Cost estimates from consultants range anywhere from \$100,000.00 for consultant fees only, to \$1 million or more depending on computer hardware, facility hardening, and security software. This is especially burdensome for smaller entities, such as NCPA, who need more time, money, and approvals from its governing board to make sure we have the funds and resources to properly prepare for and meet the new CIP reliability requirements.

Likes	0
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Dislikes	0
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Response**Laura Nelson - IDACORP - Idaho Power Company - 1**

Answer	No
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Document Name	
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Comment

Efforts for TCAs associated with low impact assets and BES Cyber Systems is substantially more work than it was for the high and medium impact locations and systems. The workload is simply due to the sheer volume of locations and people that need to be included in the scope of the procedures. Idaho Power Company is working through the procedural efforts, but a 24-month implementation period seems more appropriate due to the work load of the low impact TCA process build out.

Likes	0
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Dislikes	0
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Response**Larry Watt - Lakeland Electric - 1**

Answer	No
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Document Name	
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Comment

Efforts for TCAs associated with low impact assets and BES Cyber Systems is substantially more work than it was for the high and medium impact locations and systems. The workload is simply due to the sheer volume of locations and people that need to be included in the scope of the procedures. Procedural efforts are in progress, but a 24-month implementation period seems more appropriate due to the work load of the low impact TCA process build out. Also for consideration, Attachment 2 Section 5 part 2 indicates that contracts must be modified. Contract may take over 6 months to modify. Consider changing the implementation to span a minimum of 12 months.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

This change causes an RE to review, change, update, and approve their CIP-003 documentation. Depending on when the standard is approved, this may not fall within the RE's 15 month programmatic review of CIP-003. Consequently, depending on the how the RE's program is designed, programmatic reviews are performed, and changes are implemented, this could have a significant resource impact. The number Low Impact BES CS are much greater than M and H making this change much broader and a greater level of effort than we believe the SDT anticipates.

Likes 0

Dislikes 0

Response

Stephanie Burns - Stephanie Burns On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Stephanie Burns

Answer No

Document Name

Comment

Do not believe 12 months is a good precedent.

Likes 0

Dislikes 0

Response

Eli Rivera - Central Electric Cooperative, Inc. (Redmond, Oregon) - 1 - Texas RE

Answer No

Document Name

Comment

CenterPoint Energy Houston Electric, LLC (“CenterPoint Energy”) recommends the effective date for CIP-003-8 to be 12 calendar months after FERC approval to allow entities time to coordinate with third-parties that connect their Transient Cyber Assets to low impact BES Cyber Systems.

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Anthony Jablonski - ReliabilityFirst - 10

Answer

Yes

Document Name

Comment

ReliabilityFirst agrees with the proposed modification.

Likes 0

Dislikes 0

Response

Chris Wagner - Santee Cooper - 1, Group Name Santee Cooper

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Julie Severino - FirstEnergy - FirstEnergy Corporation - 1, Group Name FirstEnergy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leanna Lamatrice - AEP - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jeanne Kurzynowski - CMS Energy - Consumers Energy Company - 1,3,4,5 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
James Anderson - CMS Energy - Consumers Energy Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Eric Ruskamp - Lincoln Electric System - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Vivian Vo - APS - Arizona Public Service Co. - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Salsbury - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tyson Archie - Platte River Power Authority - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Russell Martin II - Salt River Project - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Karl Blaszkowski - CMS Energy - Consumers Energy Company - 3****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Heather Morgan - EDP Renewables North America LLC - 5****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

faranak sarbaz - Los Angeles Department of Water and Power - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nicholas Lauriat - Network and Security Technologies - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Anton Vu - Los Angeles Department of Water and Power - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion and HQ

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Douglas Johnson - American Transmission Company, LLC - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrey Komissarov - Andrey Komissarov On Behalf of: Daniel Frank, Sempra - San Diego Gas and Electric, 3, 5, 1; - Andrey Komissarov

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

William Sanders - Lower Colorado River Authority - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; James McBee, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; - Douglas Webb

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Amber Orr - Public Utility District No. 1 of Pend Oreille County - 3

Answer Yes

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Ryan Walter - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Chris Scanlon - Exelon - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI

Answer

Document Name

Comment

AECI supports the comments provided by NRECA.

Likes 0

Dislikes 0

Response

4. The SDT believes proposed modifications in CIP-003-8 provide entities with flexibility to meet the reliability objectives 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.

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

Answer No

Document Name

Comment

By changing the Implementation Plan to be effective based on the RE's 15 month review of CIP-003 or 15 calendar months, instead of the planned dates, it allows the RE to plan for changes to it's program during a normal review period.

We thank the SDT for allowing us to provide comments on these standards and providing clarity.

Likes 0

Dislikes 0

Response

Karl Blaszkowski - CMS Energy - Consumers Energy Company - 3

Answer No

Document Name

Comment

NO, WE DO NOT ARGEE, as the language of the "Planned Changes" treats High, Medium and Low Impact BES Cyber Systems/Assets all the same. Specifically, when it comes to Low Impact System/Assets, the changes mandate less flexibility and would require immediate, "upon commissioning" compliance and rather than being documented and discovered during the once every 15 calendar months assessment, necessitate real-time tracking of all modification projects that might add to or change Low Impact BES Cyber Systems/Assets.

Additionally:

- Much of the language dates back to the Implementation Plan of CIP-002 rev 2 and the document, **Implementation Plan for Newly Identified Critical Cyber Assets** when the focus was on much more critical and essential cyber assets that could potentially, significantly impact the reliability of the BES. Applying these same implementation/new milestones (and thus immediately "upon commissioning") and requirements to Low Impact BES Cyber Systems/Assets in not appropriate to the risk.
- To put things in perspective, Low Impact BES Cyber Systems/Assets typically would have previously been considered "non-critical" cyber assets under the earlier CIP versions/requirements and thus required zero protections, ever. Although, this may have resulted previously in some gap in protection, it is with this background that newly identified Low Impact BES Cyber Systems/Assets needs to be viewed.
- As such, a compliance implementation milestone table needs to be again utilized for not only Unplanned Changes, but Planned Changes as well.

- Additionally, keeping in line with the once every 15 calendar months assessment of cyber systems/assets, Planned additions of Low Impact BES Cyber Systems/Assets should not require individual real-time tracking (that would be necessitated with compliance upon commissioning) and instead should be discovered during the once every 15 calendar months assessment and then compliant some time thereafter, following the assessment. ...12 months seems a reasonable duration for this.
- Further, in contrast and to put things in better perspective, allowing 12 months for a High-Impact BES Cyber System/Asset (Or 24 months if a new asset type) for an Unplanned Change and yet requiring a Low Impact BES Cyber System/Asset as part of a “planned” modification to be compliant upon commissioning makes little sense, especially in a risk-based environment.
- Planned additions of new (or recently re-categorized) Low Impact systems/assets should have an implementation table commensurate with their low-to-minimal-to-possibly virtually non-existent impact.

Likes 0

Dislikes 0

Response

Larry Watt - Lakeland Electric - 1

Answer

No

Document Name

Comment

Section 5.1 Planned and Unplanned Changes specifies 24 calendar months from the date of notification or detection of the Unplanned Change to become compliant with the new rating.

Consider first in the case of a Planner (RC, PC or TP) designating a whole generating station as necessary to avoid Adverse Reliability Impact (2.3) or critical to IROLs (2.6) Nothing about the BES Cyber Systems at that generating station has changed. Nothing can be corrected because the change is not based on megawatts or time. Instead, all the BES Cyber Systems must be made to conform to 8 additional standards. Some of these existing Low Impact BES Cyber Systems may have to be replaced because they are unsupported by patches and anti-malware.

24 Months is not enough time to take a Low Impact Facility and bring it into compliance as a Medium, especially for a generation facility. Budgets, new BES System design, equipment delivery, installation of equipment and patching, writing procedures, policy and processes, creating evidence and documentation are required to go from a Low Impact to a Medium Impact System and remain in compliance. Financially, the impact of this change will cost anywhere from hundreds of thousands to millions at a generating station of any size. This needs to be a minimum of 48 Months to be completed cost effectively.

Likes 0

Dislikes 0

Response

Tyson Archie - Platte River Power Authority - 5

Answer

No

Document Name

Comment

Section 5.1 Planned and Unplanned Changes specifies 24 calendar months from the date of notification or detection of the Unplanned Change to become compliant with the new rating.

Consider first in the case of a Planner (RC, PC or TP) designating a whole generating station as necessary to avoid Adverse Reliability Impact (2.3) or critical to IROLs (2.6) Nothing about the BES Cyber Systems at that generating station has changed. Nothing can be corrected because the change is not based on megawatts or time. Instead, all the BES Cyber Systems must be made to conform to 8 additional standards. Some of these existing Low Impact BES Cyber Systems may have to be replaced because they are unsupported by patches and anti-malware.

24 Months is not enough time to take a Low Impact Facility and bring it into compliance as a Medium, especially for a generation facility. Budgets, new BES System design, equipment delivery, installation of equipment and patching, writing procedures, policy and processes, creating evidence and documentation are required to go from a Low Impact to a Medium Impact System and remain in compliance. Financially, the impact of this change will cost anywhere from hundreds of thousands to millions at a generating station of any size. This needs to be a minimum of 48 Months to be completed cost effectively.

Likes	0
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Dislikes	0
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Response

Dennis Sismaet - Northern California Power Agency - 6

Answer	No
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Document Name	
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Comment

There is no reason to change the existing two year time period in preparing to meet the new Medium or High impact CIP reliability requirements. The new requirement to start the clock running when a contract with a customer is signed to provide control center operation services to manage their generation facilities doesn't make sense if the net real power from the additional 100 MW nameplate capacity only results in 50 MW of net real power during the following summer months. It is possible that all the work, time, and money spent to go from Low to Medium impact based on a signed contract would be wasted if the net real power never reaches the 1500 MW threshold.

It would be better to keep the existing two year transition period which starts when the net real power reaches the 1500 MW threshold, regardless, when the control center operation service contract gets signed.

Likes	0
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Dislikes	0
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Response

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

Answer	No
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Document Name	
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Comment

Prior to proposing additional modifications, Reclamation recommends each SDT take additional time to effectively define the scope of each Standard Authorization Request to minimize the costs associated with the planning and adjustments required to achieve compliance with frequently changing requirements. This will provide entities with economical relief by allowing technical compliance with current standards.

Likes 0

Dislikes 0

Response

James Anderson - CMS Energy - Consumers Energy Company - 1

Answer

No

Document Name

Comment

NO, WE DO NOT ARGEE, as the language of the “Planned Changes” treats High, Medium and Low Impact BES Cyber Systems/Assets all the same. Specifically, when it comes to Low Impact System/Assets, the changes mandate less flexibility and would require immediate, “upon commissioning” compliance and rather than being documented and discovered during the once every 15 calendar months assessment, necessitate real-time tracking of all modification projects that might add to or change Low Impact BES Cyber Systems/Assets.

Additionally:

- Much of the language dates back to the Implementation Plan of CIP-002 rev 2 and the document, **Implementation Plan for Newly Identified Critical Cyber Assets** when the focus was on much more critical and essential cyber assets that could potentially, significantly impact the reliability of the BES. Applying these same implementation/new milestones (and thus immediately “upon commissioning”) and requirements to Low Impact BES Cyber Systems/Assets in not appropriate to the risk.
- To put things in perspective, Low Impact BES Cyber Systems/Assets typically would have previously been considered “non-critical” cyber assets under the earlier CIP versions/requirements and thus required zero protections, ever. Although, this may have resulted previously in some gap in protection, it is with this background that newly identified Low Impact BES Cyber Systems/Assets needs to be viewed.
- As such, a compliance implementation milestone table needs to be again utilized for not only Unplanned Changes, but Planned Changes as well.
- Additionally, keeping in line with the once every 15 calendar months assessment of cyber systems/assets, Planned additions of Low Impact BES Cyber Systems/Assets should not require individual real-time tracking (that would be necessitated with compliance upon commissioning) and instead should be discovered during the once every 15 calendar months assessment and then compliant some time thereafter, following the assessment. ...12 months seems a reasonable duration for this.
- Further, in contrast and to put things in better perspective, allowing 12 months for a High-Impact BES Cyber System/Asset (Or 24 months if a new asset type) for an Unplanned Change and yet requiring a Low Impact BES Cyber System/Asset as part of a “planned” modification to be compliant upon commissioning makes little sense, especially in a risk-based environment.
- Planned additions of new (or recently re-categorized) Low Impact systems/assets should have an implementation table commensurate with their low-to-minimal-to-possibly virtually non-existent impact.

Likes 0

Dislikes 0

Response

Jeanne Kurzynowski - CMS Energy - Consumers Energy Company - 1,3,4,5 - RF

Answer No

Document Name

Comment

NO, WE DO NOT ARGEE, as the language of the “Planned Changes” treats High, Medium and Low Impact BES Cyber Systems/Assets all the same. Specifically, when it comes to Low Impact System/Assets, the changes mandate less flexibility and would require immediate, “upon commissioning” compliance and rather than being documented and discovered during the once every 15 calendar months assessment, necessitate real-time tracking of all modification projects that might add to or change Low Impact BES Cyber Systems/Assets.

Additionally:

- Much of the language dates back to the Implementation Plan of CIP-002 rev 2 and the document, **Implementation Plan for Newly Identified Critical Cyber Assets** when the focus was on much more critical and essential cyber assets that could potentially, significantly impact the reliability of the BES. Applying these same implementation/new milestones (and thus immediately “upon commissioning”) and requirements to Low Impact BES Cyber Systems/Assets in not appropriate to the risk.
- To put things in perspective, Low Impact BES Cyber Systems/Assets typically would have previously been considered “non-critical” cyber assets under the earlier CIP versions/requirements and thus required zero protections, ever. Although, this may have resulted previously in some gap in protection, it is with this background that newly identified Low Impact BES Cyber Systems/Assets needs to be viewed.
- As such, a compliance implementation milestone table needs to be again utilized for not only Unplanned Changes, but Planned Changes as well.
- Additionally, keeping in line with the once every 15 calendar months assessment of cyber systems/assets, Planned additions of Low Impact BES Cyber Systems/Assets should not require individual real-time tracking (that would be necessitated with compliance upon commissioning) and instead should be discovered during the once every 15 calendar months assessment and then compliant some time thereafter, following the assessment. ...12 months seems a reasonable duration for this.
- Further, in contrast and to put things in better perspective, allowing 12 months for a High-Impact BES Cyber System/Asset (Or 24 months if a new asset type) for an Unplanned Change and yet requiring a Low Impact BES Cyber System/Asset as part of a “planned” modification to be compliant upon commissioning makes little sense, especially in a risk-based environment.
- Planned additions of new (or recently re-categorized) Low Impact systems/assets should have an implementation table commensurate with their low-to-minimal-to-possibly virtually non-existent impact.

Likes 0

Dislikes 0

Response

Chris Wagner - Santee Cooper - 1, Group Name Santee Cooper

Answer No

Document Name

Comment

Section 5.1 Planned and Unplanned Changes specifies 24 calendar months from the date of notification or detection of the Unplanned Change to become compliant with the new rating.

Consider first in the case of a Planner (RC, PC or TP) designating a whole generating station as necessary to avoid Adverse Reliability Impact (2.3) or critical to IROLs (2.6) Nothing about the BES Cyber Systems at that generating station has changed. Nothing can be corrected because the change is not based on megawatts or time. Instead, all the BES Cyber Systems must be made to conform to 8 additional standards. Some of these existing Low Impact BES Cyber Systems may have to be replaced because they are unsupported by patches and anti-malware.

24 Months is not enough time to take a Low Impact Facility and bring it into compliance as a Medium, especially for a generation facility. Budgets, new BES System design, equipment delivery, installation of equipment and patching, writing procedures, policy and processes, creating evidence and documentation are required to go from a Low Impact to a Medium Impact System and remain in compliance. Financially, the impact of this change will cost anywhere from hundreds of thousands to millions at a generating station of any size. This needs to be a minimum of 48 Months to be completed cost effectively.

Likes 0

Dislikes 0

Response

Anthony Jablonski - ReliabilityFirst - 10

Answer

Yes

Document Name

Comment

ReliabilityFirst agrees with the proposed modification.

Likes 0

Dislikes 0

Response

Chris Scanlon - Exelon - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ryan Walter - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC

Answer Yes

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Amber Orr - Public Utility District No. 1 of Pend Oreille County - 3

Answer Yes

Document Name

Comment	
Likes	0
Dislikes	0
Response	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; James McBee, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 5, 1, 3, 6; - Douglas Webb	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
William Sanders - Lower Colorado River Authority - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Andrey Komissarov - Andrey Komissarov On Behalf of: Daniel Frank, Sempra - San Diego Gas and Electric, 3, 5, 1; - Andrey Komissarov	
Answer	Yes
Document Name	
Comment	
Likes	0

Dislikes 0

Response

Stephanie Burns - Stephanie Burns On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Stephanie Burns

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Douglas Johnson - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Anton Vu - Los Angeles Department of Water and Power - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nicholas Lauriat - Network and Security Technologies - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

faranak sarbaz - Los Angeles Department of Water and Power - 1

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Heather Morgan - EDP Renewables North America LLC - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Russell Martin II - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Kevin Salsbury - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Vivian Vo - APS - Arizona Public Service Co. - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Eric Ruskamp - Lincoln Electric System - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Leanna Lamatrice - AEP - 3****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Julie Severino - FirstEnergy - FirstEnergy Corporation - 1, Group Name FirstEnergy****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Joe Tarantino - Joe Tarantino On Behalf of: Arthur Starkovich, Sacramento Municipal Utility District, 4, 1, 5, 6, 3; Beth Tincher, Sacramento Municipal Utility District, 4, 1, 5, 6, 3; Jamie Cutlip, Sacramento Municipal Utility District, 4, 1, 5, 6, 3; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 4, 1, 5, 6, 3; Susan Oto, Sacramento Municipal Utility District, 4, 1, 5, 6, 3; - Joe Tarantino

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Eli Rivera - Central Electric Cooperative, Inc. (Redmond, Oregon) - 1 - Texas RE

Answer

Document Name

Comment

No response.

Likes 0

Dislikes 0

Response

Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI

Answer	
Document Name	
Comment	
AECI supports the comments provided by NRECA.	
Likes 0	
Dislikes 0	
Response	
Jonathan Robbins - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC	
Answer	
Document Name	
Comment	
No comments regarding modifications.	
Likes 0	
Dislikes 0	
Response	