Unofficial Comment Form

Project 2019-02 BES Cyber System Information Access Management

**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 2019-02 BES Cyber System Information Access Management** by **8 p.m. Eastern, September 21, 2020.**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project2019-02BCSIAccessManagement.aspx). If you have questions, contact Senior Standards Developer, Latrice Harkness (via email), or at 404-446-9728.

## Background Information

The purpose of Project 2019-02 BES Cyber System Information Access Management is to clarify the CIP requirements related to both managing access and securing BES Cyber System Information (BCSI). This project proposes revisions to Reliability Standards CIP-004-6 and CIP-011-2.

The proposed revisions enhance BES reliability by creating increased choice, greater flexibility, higher availability, and reduced-cost options for entities to manage their BCSI. In addition, the proposed revisions clarify the protections expected when utilizing third-party solutions (e.g., cloud services).

## Questions

1. Do you agree the revisions to CIP-004 clarify the requirements for managing provisioned access to BCSI when utilizing third-party solutions (e.g., cloud services)?

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the revisions to CIP-004 clarify that entities are only required to manage the provisioning of physical access to physical BCSI and electronic access to electronic BCSI?

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the revisions to CIP-011 clarify the protections expected when utilizing third-party solutions (e.g., cloud services)?

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the new and revised VSL/VRF descriptions clearly align with the revisions to CIP-004 and CIP-011?

[ ]  Yes

[ ]  No

Comments:

1. The SDT is proposing an 18-month implementation plan. Do you agree to the proposed timeframe?

[ ]  Yes

[ ]  No

Comments:

1. The SDT proposes that the modifications in CIP-004 and CIP-011 meet the project scope 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.

[ ]  Yes

[ ]  No

Comments:

1. Provide any additional comments for the standard drafting team to consider, if desired.

Comments: