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Subject: NERC Ballot -Project 2016-02 Modifications to CIP Standards
Date: Wednesday, April 25, 2018 8:23:08 AM

RSC Members,

The NPCC TFIST has submitted their comment forms to NPCC Staff and recommended voting actions on the subject ballots which are currently open until 8pm 4/30/2018.

More information will be coming out later this morning however the condensed results of their discussions are as follows.

1. CIP-002-6 - Cyber Security - BES Cyber System Categorization –TFIST -**Affirmative** vote recommendation- **TFIST comment-does “logical protection” mean encryption? Should logical protection be a defined term?**
2. CIP-012-1 – Cyber Security – Communications between Control Centers-TFIST -**Affirmative** vote recommendation- **TFIST comment-For requirements that contain periodic obligations, initial performance of those obligations following an Unplanned Change shall occur within the first period following the date that the Implementation Period ends, as defined in the table**
3. Project 2016-02 Modifications to NERC Glossary of Terms Used in Reliability Standards – TFIST - Control Center-**Negative** vote recommendation- **TFIST will be providing a comment form with all the issues they have identified. There are numerous opportunities for the SDT to clarify what their intent was for the terms used in the definition. For instance-why is “Real time” and related added in multiple places, what does “can” mean in the phrase “can act independently” or perform-as it relates to capability and authority. Regarding the Implementation Plan, also posted for ballot, TFIST commented they do not support this and noted that “The Implementation Plan should state that any facilities that are newly identified as Control Centers as a result of the revised definition will have 24 months to meet newly applicable compliance requirements that apply to those Control Centers.”**

As the Regional Entity, NPCC will vote **Affirmative** on the two standards and with a **Positive Opinion** for their associated non-binding polls, and cast a **Negative** ballot on the Control Center Definition and Implementation Plan due primarily to the vague, ambiguous, and unnecessary terms used in the definition as well as the issue with the Implementation Plan as mentioned above. We will send along the final TFIST comment forms shortly.

Thanks,

Guy