RSC Members and All,

As noted in the NERC Announcement below, the CIP-003-7 is open for an initial ballot through 8pm December 5th, 2016. We have received a TFIST recommendation indicating a negative vote. There were a number of abstentions from TFIST for their ballot recommendation. If your organization has ballot positions please let me know. TFIST concerns seem to be as follows.

Implementation Plan – too short, they suggest 18 months instead of 12 months
CIP-003-7 – They are concerned with the “should” language in the examples in the guideline section of the standard
Non-Binding poll- I am waiting to hear however assume this to also be negative.

The project page may be found here: http://www.nerc.com/pa/Stand/Pages/Project%202016-02%20Modifications%20to%20CIP%20Standards.aspx

When considering your organization’s position please keep in mind that there is a directive associated with this standard, specifically as it relates to the definition of “Low Impact External Routable Communications” (LERC). NERC needs to file a revision to this standard by April 1, 2017 to address this directive. In consideration of the above and the issues that TFIST sees with the standard, which are not the part of the standard deemed to approved by FERC and not enforceable, NPCC will be casting its vote, as the Regional Entity, to accept the Standard, Implementation Plan, and also voting positive on the non-binding poll. The Implementation Plan may be subject to change to 18 months if there is enough concern, however due to the importance of this issue at FERC NPCC will also support the shorter implementation. If there are any dissenting members of the RSC that plan to vote negatively, please let me know so I will send out a list of issues to the NPCC members and entities to indicate this. Also, should this fail at ballot there may be an issue with NERC being able to develop another draft and have it approved by stakeholders and the NERC BOT in time to meet the deadline. I am unaware of any NERC filing for an extension for more time.

Additionally, there is a desire by NERC to make additional changes to this standard which include, but may not be limited to addition of the Transit Cyber Asset requirement (CIP-007-TCA) and the Exceptional Circumstances definition which will outline when an entity does not have to comply with the CIP Standards during emergencies. These revisions are in progress and although part of the project, are not up for ballot at this time.

Please let me know your organization’s position as soon as possible. Thanks to all and have a Happy Thanksgiving to our US constituents.

Best Regards,

Guy
Standards Announcement Reminder

Project 2016-02 Modifications to CIP Standards

Additional Ballots and Non-binding Poll Open through December 5, 2016

Now Available

The following ballots are open through 8 p.m. Eastern, Monday, December 5, 2016:

1. Additional ballot for CIP-003-7 - Cyber Security – Security Management Controls
2. Additional ballot for CIP-003-7 Implementation Plan
3. Non-binding poll of the associated Violation Risk Factors and Violation Severity Levels

Balloting

Members of the ballot pools associated with this project may log in and submit their vote for the standard and its implementation plan, and the non-binding poll by clicking here. If you experience any difficulties in using the electronic form, contact Wendy Muller.

If you are having difficulty accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out, contact NERC IT support directly at https://support.nerc.net/ (Monday – Friday, 8 a.m. - 5 p.m. Eastern).

Next Steps

The ballot results will be announced and posted on the project page. The drafting team will review all responses received during the comment period and determine the next steps of the project.


For more information or assistance, contact Senior Standards Developer, Al McMeekin (via email) or at (404) 446-9675.

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