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**Subject:** NERC Ballot - 2016-02 Modifications to CIP Standards | CIP-012-1 Cyber Security Communications between Control Centers  
**Date:** Monday, December 4, 2017 7:43:11 AM

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NPCC Members and Entities of the Registered Ballot Body,

The NPCC Regional Standards Committee in conjunction with the Task Force on Infrastructure Security and Technology has reviewed the subject standard currently posted for an additional ballot through **8 pm December 11, 2017**. The RSC has not reached consensus on a ballot position however the majority of RSC members with a position for their organization indicated intent to support the standard. The issues precluding consensus support are as follows:

- R1 requires the Responsible Entity to develop one or more documented plan(s) to mitigate the risk of the unauthorized disclosure or modification of Real-time Assessment and Real-time monitoring and control data while being transmitted between any Control Centers. There is a question related to where the demarcation point lies for determining what is protected and also what needs to be done when there is disagreement between different Entities.
- The Implementation Plan proposes the effective date to be 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, or as otherwise provided for by the applicable governmental authority. Some folks are concerned that there may need to be renegotiation/abrogation of existing contracts.
- General concern exists with the removal of the Guidelines and Technical Basis section from the standard. This is an approach that NERC has decided to implement to avoid confusion. This section should not be confused with Compliance Implementation Guidance and not house approaches to compliances. Removing it from the standard helps to ensure understanding that this explanatory material is not part of the standard.

In consideration of the above, NPCC as the Regional Entity will be casting an **Affirmative** ballot to support the standard and submitting comments. NPCC sees the draft standard contributing to security of communications. NPCC will also be casting a positive opinion on the supporting Violation Severity Levels.

If there are any questions please contact me.

Thanks,

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