

**From:** [Guy V. Zito](#)  
**To:** [rsballot](#)  
**Cc:** [rscmembers](#); [tfist](#)  
**Subject:** NERC Ballot - 2018-02 Modifications to CIP-008 Cyber Security Incident Reporting  
**Date:** Monday, October 22, 2018 10:01:23 AM

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NPCC Members and Entities of the NERC Registered Ballot Body,

**The subject standard is posted for an abbreviated 20-day formal comment period through 8 p.m. Eastern, Monday, October 22, 2018. The 5-day initial ballot for the standard, and a non-binding poll of the associated Violation Risk Factors and Violation Severity Levels are also being conducted through 8pm October 22, 2018 (today).**

The NPCC Task Force on Infrastructure Technology (TFIST) is recommending a vote to reject the standard and negative on the non-binding poll. The Regional Standards Committee members have reviewed the comments developed by TFIST and the voting recommendation. All responding members of the RSC will be casting a negative vote with one exception. The RSC believes there is opportunity for the SDT to develop some revisions to the standard to clarify the intent of "attempted" cyber incident reporting as it appears in the current draft. FERC Order 848 contained the following Directives:

- Responsible entities must report Cyber Security Incidents that compromise, **or attempt to compromise**, a responsible entity's ESP or associated EACMS;
- Required information in Cyber Security Incident reports should include certain minimum information to improve the quality of reporting and allow for ease of comparison by ensuring that each report includes specified fields of information;
- Establish deadlines for filing Cyber Security Incidents that are commensurate with incident severity; and
- Cyber Security Incident reports should be sent to the Electricity Information Sharing and Analysis Center (E-ISAC) and the Department of Homeland Security (DHS) Industrial Control Systems Cyber Emergency Response Team (ICS-CERT).

**NERC must file the revised standard, addressing the Directives by April 1, 2019.** There will be one more formal (shortened) comment period and ballot in November with a final ballot shortly thereafter. NERC must have an approved standard in time for presentation to their Board of Trustees in order to meet the April 1, 2019 deadline to file.

NPCC, as the Regional Entity and giving due respect to the concerns expressed by the TFIST and voting position of the RSC member companies, will be voting to **Reject for this Initial ballot and Negative on the non-binding poll**. NPCC will be submitting Regional consensus comments to improve the next draft and post them on the NPCC website. If your organization has additional comments which may improve clarity of the standard, while maintaining the intent to address the above Directives, please ensure you submit them individually to **NERC by 8pm today**. I encourage your organizations to submit comments that you may have and not hold proposed revisions for the next comment period.

If you have any questions please contact me.

Guy V. Zito  
Chair RSC  
NPCC Asst. Vice President of Standards  
212-840-1070