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Subject: NERC Ballot- Project 2018-02 Modifications to CIP-008 Cyber Security Incident Reporting
Date: Wednesday, November 21, 2018 3:20:28 PM
Importance: High

NPCC Members and Entities of the NERC Registered Ballot Body.

The subject standard project is currently posted for an “additional” ballot and formal comment period (shorted) until 8pm November 29, 2018. The initial ballot, conducted in October, received a 20% approval and since then the SDT has made significant changes based on industry comment. **NERC must have the standard approved by stakeholders, the NERC Board of Trustees, and filed with the FERC by April 1, 2019 with all the Directives from Order 848 addressed.** The Regional Standards Committee (RSC) in conjunction with input from the NPCC Task Force on Infrastructure Protection (TFIST) has reviewed the standard and relevant posted materials. RSC Members, responding as of this time, have indicated that they will support the standard however there are some outstanding issues as follows:

- Although there seems to be clarity provided by the NERC drafting team that Protected Cyber Assets were not included in the scope of this project, some entities are confused what the expectation is regarding reporting – specifically is the Entity expected to report on PCAs or not? Some entities have indicated that the NERC webinar and guidance contained some conflicting expectations.
- There could be a consistency issue with allowing entities to individually define what is an “attempted” Cyber Security Incident is.

Irrespective of the above minor issues, NPCC believes the SDT has satisfactorily addressed the FERC Order 848 Directives and worked within the scope of their Standards Authorization Request (SAR). It is also important to keep in mind that entity reporting beyond what the standard requires would be voluntary, and the draft standard, in the view of NPCC, importantly, addresses the FERC Directives. NPCC believes the revised standard supports “reliable operation of the BPS”, as defined in the statutory legislation, so at this time **NPCC as the**

Regional Entity intends to vote Affirmative on the draft standard as written, Implementation Plan, and VSLs in the non-binding poll and suggests supporting the ballot and non-binding poll.

If you have any questions please contact me.

Thanks,

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