Do not use this form for submitting comments. Use the Standards Balloting and Commenting System (SBS) to submit comments on CIP-002-6 - Cyber Security – BES Cyber System Categorization. Comments must be submitted by 8 p.m. Eastern, Wednesday, July 17, 2019.

Additional information is available on the project page. If you have questions, contact Standards Developer, Jordan Mallory (404-446-2589).

Background Information
Project 2016-02 was formed to (1) address the Federal Energy Regulatory Commission (Commission) directives contained in Order No. 822 and (2) consider the Version 5 Transition Advisory Group (V5TAG) issues identified in the CIP V5 Issues for Standard Drafting Team Consideration (V5TAG Transfer Document).

The V5TAG, which consisted of representatives from NERC, Regional Entities, and industry stakeholders, was formed to issue guidance regarding possible methods to achieve compliance with the CIP Version 5 standards and to support industry’s implementation activities. During the V5TAG’s activities, it identified certain issues with the CIP Reliability Standards that would be better addressed by a standard drafting team (SDT) for the CIP Reliability Standards. The V5TAG developed the CIP Version 5 Transition Advisory Group Issues for Consideration document to formally recommend that the SDT address these issues and consider modifications to the standard language during the standards development process. Among other issues of the V5TAG recommended clarification of the phrase “used to perform the functional obligations of the Transmission Operator” in CIP-002-5.1a, Attachment 1, Criterion 2.12. The Project 2016-02 Standard Drafting Team (SDT) proposes the following modifications to CIP-002-5.1a, Attachment 1, Criterion 2.12 to clarify the applicability of requirements on a TO Control Center that performs the functional obligations of a TOP.

The proposed criterion establishes an average MVA line loading based on voltage class, for BES Transmission Lines operated between 100 and 499 kV. The aggregate weighted value for applicable BES Cyber Systems must exceed 6000 to meet the minimum threshold established in Criterion 2.12. The aggregate weighted value is calculated by summing the "weight value per line" shown in the associated table for each BES Transmission Line monitored and controlled by the Control Center or backup Control Center. If the BES Cyber System(s) exceeds the 6000 aggregate weighted value, it should be identified as a medium impact BES Cyber System. If the BES Cyber System does not exceed the 6000 aggregate weighted value, it should be categorized as a low impact BES Cyber System pursuant to Criterion 3.1.

These changes were posted and balloted (93% approval) by industry in April, 2018. Since that time, other changes have been incorporated into CIP-002-6. The proposed CIP-002-6 also includes new clarifying language in the Effective Date section of the standard that addresses the compliance date for...
BES Cyber Systems whose impact categorization changes due to Bulk Electric System changes. These changes fall into either planned or unplanned change categories.

A version of CIP-002-6 was posted for ballot September 28 through October 9, 2018 that included modifications to criteria 2.6 and 2.9 based on the work of the Project 2015-09 – Establish and Communicate System Operating Limits standard drafting team. The Project 2016-02 and Project 2015-09 standard drafting teams determined that these revisions are no longer needed at this time. As a result, CIP-002-6 will be posted for an additional comment and ballot period without these revisions to criteria 2.6 and 2.9. NERC will reopen the ballot pool to accommodate changes in the ballot body.

Questions

1. Attachment 1, Criterion 2.12: No changes have been added from the April 2018 ballot. Do you agree with the proposed modifications in CIP-002-6 Attachment 1, Criterion 2.12? If not, please provide your rationale and an alternate proposal.

☐ Yes
☐ No

Comments:

2. Effective Date Section: The SDT is proposing to clarify that for Planned Changes resulting in a new BES Cyber System, the categorization of the BES Cyber System shall become effective upon the date the new BES Cyber System is capable of impacting the BES. Do you agree with the proposed modification? If no, please provide your rationale and an alternate proposal.

☐ Yes
☐ No

Comments:

3. Effective Date Section: The SDT is proposing to clarify that for Planned Changes resulting in a change in categorization for an existing BES Cyber System, the categorization of the BES Cyber System shall become effective upon the date the BES Cyber System meets the new impact criteria in Attachment 1, regardless of when the responsible entity performs its review of identifications under Requirement R2, Part 2.1. Do you agree with the proposed modification? If no, please provide your rationale and an alternate proposal.

☐ Yes
☐ No

Comments:
4. Effective Date Section: Do you agree with the proposed modification to the unplanned changes section that provides 24 months for implementation of the requirements? If yes, please provide comments on why the timeframe is appropriate to assist the SDT with additional justification. If no, please provide your rationale and an alternate proposal.

☐ Yes
☐ No

Comments:

We agree with 24 months for the implementation of requirements for unplanned changes. Unplanned changes can have significant impacts and place substantial demands on technical resources, depending upon the scope of the unplanned changes.

5. Implementation Plan: The SDT modified the Implementation Plan. Do you agree with the proposed Implementation Plan?
   
a. If yes, please provide comments on why the timeframes are appropriate to assist the SDT with additional justification.
   
b. If you think an alternate, shorter or longer implementation time period is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.

☐ Yes
☐ No

Comments:

We like the Implementation Plan as is.

We agree with 24 months for the implementation of requirements for unplanned changes. Unplanned changes can have significant impacts and place substantial demands on technical resources, depending upon the scope of the unplanned changes.

6. The SDT believes proposed modifications in CIP-002-6 provide entities with flexibility to meet the reliability objectives in a cost effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

☐ Yes
☐ No

Comments: