Unofficial Comment Form
Project 2016-02 Modifications to CIP Standards
Transmission Owner (TO) Control Center (TOCC) Performing
Transmission Operator (TOP) Obligations, CIP-002-6

Do not use this form for submitting comments. Use the electronic form to submit comments on CIP-002-6 – Cyber Security – BES Cyber System Categorization. The electronic form must be submitted by 8 p.m. Eastern, Monday, October 30, 2017.

Additional information is available on the project page. If you have questions, contact Standards Developers, Katherine Street at (404) 446-9702 or Mat Bunch at (404) 446-9785.

Background Information
The purpose of Project 2016-02 is 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 consisted of representatives from FERC, NERC, Regional Entities and industry stakeholders. It was formed to issue guidance on possible methods to achieve compliance with the CIP V5 standards and to support industry’s implementation activities. In the course of 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 Issues for Standard Drafting Team Consideration document (V5TAG Transfer Document) to formally recommend that the SDT address these issues during the standards development process, and to consider modifications to the standard language.

Among other issues, 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.

Accordingly, the Project 2016-02 SDT proposes the following modifications to CIP-002-5.1a, Attachment 1, Criterion 2.12 to clarify the applicability of requirements to 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 and can be 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 aggregate weight value of lines exceed 6000, the Control Center’s associated BES Cyber System(s) must be identified as medium impact. If the aggregate weight value of lines does not exceed 6000, the Control Center’s associated BES Cyber System(s) must be evaluated for classification as low impact pursuant to Criterion 3.1.
Guidelines and Technical Basis
At NERC’s direction, the current draft Guidelines and Technical Basis section will be removed from the Reliability Standard template prior to final ballot. The SDT will evaluate the content for placement in a Technical Rationale document for posting along with, but separate from, the Reliability Standard. Additionally, the SDT may develop Implementation Guidance on this Reliability Standard to submit for ERO endorsement based on the content of this section.

SDT Approach
The Project 2016-02 SDT proposes the following modifications to CIP-002-5.1a, Attachment 1, Criterion 2.12 to clarify the applicability of requirements for a TO Control Center that performs the functional obligations of a TOP. This proposed criterion establishes a minimum threshold for medium impact BES Cyber Systems associated with Control Centers that monitor and control BES Transmission Lines, regardless of a Responsible Entity’s functional registration. This allows TOs and TOPs to identify their BES Cyber Systems associated with Control Centers as medium or low impact based on the BES Cyber System’s span of control. This contrasts with the currently approved Criterion 2.12, which identifies BES Cyber Systems as medium impact when they are associated with a Control Center or backup Control Center used to perform the functional obligations of the TOP and not included in the high impact rating.
Questions

1. Criterion 2.12: In the V5TAG Transfer Document, the V5TAG requested the SDT to “clarify the applicability of requirements on a TO Control Center that perform the functional obligations of a TOP, particularly if the TO has the capability to operate switches, breakers, and relays in the BES.” The SDT modified CIP-002-5.1a Attachment 1, Criterion 2.12 to make this clarification. Do you agree that the revision clarifies the applicability of Criterion 2.12? If not, please provide your rationale and an alternate proposal.
   - Yes
   - No
   Comments:

2. Criterion 2.12: The SDT modified CIP-002-5.1a Attachment 1, Criterion 2.12 to be similar to the construct used in Criterion 2.5. Do you agree with the SDT’s approach in the modified criterion to evaluate a BES Cyber System’s span of control by summing the weighted value of each BES Transmission Line that the BES Cyber System monitors and controls? If not, please provide your rationale and an alternate proposal.
   - Yes
   - No
   Comments:

3. Criterion 2.12: Do you agree with the 6000 aggregate weighted value that is used in Criterion 2.12 to establish the minimum threshold for medium impact BES Cyber Systems associated with Control Centers that monitor and control Transmission? If not, please provide your rationale and an alternate proposal.
   - Yes
   - No
   Comments:

4. Criterion 2.12: The SDT modified Criterion 2.12 to categorize BES Cyber Systems associated with Control Centers that monitor and control Transmission regardless of a Responsible Entity’s functional registration. Do you agree with this approach? If not, please provide your rationale and an alternate proposal.
   - Yes
   - No
   Comments:

5. Criterion 2.12: Do you agree with the proposed modifications to Criterion 2.12? If not, please provide your rationale and an alternate proposal.
We support the concept of establishing criteria for Medium Impact Control Centers and Low Impact Control Centers. We support the approach of basing the criteria on "aggregate weighted value" of Transmission Lines controlled by BES Cyber Systems located at the Control Centers. However, as proposed, Criterion 2.12 is ambiguous as to how the "aggregate weighted value" is derived. Is it derived by summing the values for all Transmission Lines monitored and controlled by a Control Center, or should it be derived by summing the value for Transmission Lines monitored and controlled by BES Cyber Systems located at the Control Center? Also, the criterion is not clear on whether "control" refers to control by personnel at the Control Center (e.g., by verbal instruction to field personnel) or to control by a BES Cyber System.

We suggest adding the following sentence (similar to wording in criteria 2.1 and 2.1) to the end of the proposed Criterion 2.12. "The only BES Cyber Systems that meet this criterion are those shared BES Cyber Systems that monitor and control BES Transmission Lines with an "aggregate weighted value" exceeding 6000 according to the table below."

6. Implementation Plan: Do you agree with the SDT’s proposed Implementation Plan? If you agree with the proposed implementation time period, please note the actions you will take that require this amount of time to complete. If you think an alternate implementation time period is needed – shorter or longer - please propose an alternate implementation plan and provide a detailed explanation of actions and time needed to meet the implementation deadline.

☐ Yes
☐ No

Comments:

7. The SDT considered a number of approaches and determined that proposed CIP-002-6 provides 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 a more cost effective approach that addresses the reliability objective, please provide your recommendation and, if appropriate, technical justification.

☐ Yes
☐ No

Comments:

8. If you have additional comments on proposed CIP-002-6, Attachment 1, Criterion 2.12 that you have not provided in response to the questions above, please provide them here.

Comments:
Since the Guidance & Technical Basis (GTB) will be removed, we need clarification on where this GTB goes. Some GTB information such as the BROS (BES Reliability Operating Services) should be included in an Implementation Guideline and not a technical reference document.

NERC’s statement inserted into the first paragraph of the Guidelines and Technical Basis (GTB) regarding removal of the GTB before final ballot is a critical issue for this ballot. This creates an untenable situation where the approval of this standard must rest on the language currently contained solely in the requirements of the standard.

The problem is that registered entities’ existing CIP programs have been built using the GTB as a guide to understanding the meaning of the impact rating criteria in CIP-002, which is used to identify the BES Cyber System impact ratings that set the foundation of applicability for the other CIP standards. As a result, we do not agree with NERC’s approach to removing the GTB without providing transparent next steps as to which information will be retained in the Technical Rationale and how that rationale will be treated. Implementation Guidance is also mentioned as a possibility for the SDT, but no certainty as to whether or when the SDT will develop it is provided. Alternatively, the SDT could modify the Attachment 1 criteria to include the guidance from the GTB.