Do not use this form for submitting comments. Use the electronic form to submit comments on the Project 2016-02 Modifications to CIP Standards SAR. The electronic comment form must be submitted by 8 p.m. Eastern, Thursday, June 30, 2016.

Additional information about this project is available on the Project 2016-02 Modifications to CIP Standards page. If you have questions, contact either Senior Standards Developer, Stephen Crutchfield at (609) 651-9455 or Al McMeekin at (404) 446-9675.

Background Information
On January 21, 2016, the Commission issued Order No. 822, Revised Critical Infrastructure Protection Reliability Standards, approving seven CIP Reliability Standards and new or modified definitions. On March 9, 2016, the NERC Standards Committee accepted the Standards Authorization Request (SAR) and authorized the posting of the Modifications to CIP Standards SAR. It was posted for a 30-day informal comment period March 23 – April 21, 2016. Based on the comments received, the Standard Drafting Team (SDT) made minor revisions to the SAR which will be posted for an additional 30-day informal comment period.

It was noted in the comments received on the SAR that the Virtualization issue involved more than just CIP-005 standards and the defined terms Cyber Asset and Electronic Access Point. To correct this, the SDT revised the sentence to: “Because of the increasing use of virtualization in industrial control system environments, VSTAG asked that the SDT consider CIP-005 and the definitions of Cyber Asset and Electronic Access Point the CIP V5 standards and the associated definitions regarding permitted architecture and the security risks of network, server and storage virtualization technologies.”

Other commenters suggested that the SDT include provisions to address CIP Exceptional Circumstances. A sentence was added to the SAR to include this topic: “In addition, the SDT will review and address the CIP V5 requirements for CIP Exceptional Circumstances exceptions.”

A sentence was also added to the SAR allowing the SDT to make errata changes to the standards as necessary and to correct grammatical, punctuation and/or formatting errors in the V5 Standards: “Finally, the SDT will review the Guidelines and Technical Basis sections of the CIP V5 standards and adjust where appropriate as well as correct any grammatical, punctuation, and/or formatting errors, and make other errata changes to the CIP V5 standards, as necessary.”

In the previous version of the SAR, the Transmission Service Provide (TSP) Reliability Function was checked as an applicable function. The TSP is not applicable under the CIP standards and this function was corrected by unchecking the TSP Reliability Function in this version of the SAR. Similarly, the Distribution
Provider (DP) Reliability Function was left unchecked in the original SAR. The CIP Standards apply to the DP, so this was corrected by checking the DP Reliability Function in this version of the SAR.

Questions

1. The CIP SDT revised the SAR based on the comments received in the previous posting as noted above. Do you agree with these revisions to the SAR? If not, please explain why you do not agree, and, if possible, provide specific language revisions that would make it acceptable to you.
   
   Yes: X
   
   No:
   
   Comments:
   
   We support the revisions to the SAR.