Background Information
The purpose of Project 2016-02 is to (1) consider the Version 5 Transition Advisory Group (V5TAG) issues identified in the CIP V5 Issues for Standard Drafting Team Consideration (V5TAG Transfer Document) and (2) address the Federal Energy Regulatory Commission (Commission) directives contained in Order No. 822. These revisions will increase reliability and security to the Bulk-Power System (BPS) by enhancing cyber protection of BPS facilities.

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 V5 standards and to support industry’s implementation activities. During the course of the V5TAG’s activities, the V5TAG identified certain issues with the CIP Reliability Standards that were more appropriately addressed by the existing standard drafting team (SDT) for the CIP Reliability Standards. The V5TAG developed the V5TAG Transfer Document to formally recommend that the SDT address these issues during the standards development process and to consider whether modifications can be made to the standard language.

Among other things, due to the confusion of the application of the phrase “used to perform the functional obligation of” in CIP-002-5.1a, Attachment 1, criterion 2.12, the V5TAG recommended clarification of:

- The applicability of requirements on a TO Control Center that performs the functional obligations of a TOP, particularly if the TO has the ability to operate switches, breakers and relays in the BES.
- The definition of Control Center.
- The language scope of “perform the functional obligations of” throughout the Attachment 1 criteria.
This issue was included in the SAR for Project 2016-02 as follows:

- Identify items to be addressed to provide additional clarity and revisions to CIP-002-5.1a Attachment 1. TO Control Centers, specifically around performing the functional obligations of a TOP for small or lower-risk entities should be addressed.

- Clarify the applicability of requirements on a TO Control Center that perform the functional obligations of a TOP, particularly if the TO has the ability to operate switches, breakers and relays in the BES. CIP-002-5.1a indicates that any Control Center performing the actions noted above is to be considered a medium risk asset if not already identified as a high. There is no allowance for an entity performing such functions to identify their BES Cyber System(s) as low impact.

- If necessary and appropriate, the definition of Control Center may need to be revised to provide the additional clarity needed.

The purpose of this comment form is solicit stakeholder feedback to gather input on the V5TAG issue related to TO Control Centers performing TOP obligations to aid the SDT’s consideration of this issue. For a discussion of this issue, please reference the associated TOCC White Paper drafted by the SDT that outlines the background and technical consideration on this issue as well as approaches the SDT is considering to address this issue.
Questions

1. Do you agree with the assertions outlined in the TOCC White Paper (page 8) regarding capability versus authority? Please provide your rationale to support your opinion.
   - Yes
   - No

   Comments:
   While the word “obligation” in the phrase “perform the functional obligation of” relates to the authority, the purpose of the CIP standards is to require Cyber Security based on risk. This risk is determined by that capability of the equipment and not the authority of the entity.

2. Do Transmission Owner(s) that have the capability to perform the functional obligations of Transmission Operator(s) present risk(s) to the reliability of the BES significant enough that the Transmission Owner(s) associated Control Center(s) should be designated as medium or high impact? Please provide your rationale including specific practices that may mitigate risks.
   - Yes
   - No

   Comments:
   A TO Control Center can present risk to the BES based on its capabilities but not based on its functional obligation. This risk should be allowed to be identified as low impact as well as high and medium.

3. The Project 2008-06 SDT (706 SDT) included the phrase “used to perform the functional obligation of” to provide protection to BES Cyber System(s) that may be misused and impact the BES regardless of which functional entity operates those BES Cyber Systems. For criterion 2.12 in CIP-002-5.1a Attachment 1, does the intent of the “perform functional obligation of” language require additional guidance or clarity? If you believe additional clarity is needed, please provide suggestions and alternatives as well as support for your positions.
   - Yes
   - No

   Comments:
   We agree that “perform functional obligation of” language requires additional guidance or clarity.
   We agree that the cyber risk of Transmission Owners who can open/close breakers that lack decision-making authority should be addressed.
   The “Perform the functional obligations of” phrase is about authority and not capability and should be removed or replaced with both the applicable registrations and criteria for the identification of high, medium and low risk. Suggest modifying Criteria 2.12 to include specific language for the identification of Medium Impact Control Centers which would allow for Low Impact Control Centers.
   A proposed criteria 2.12 is
2.12. Each Control Center or backup Control Center not included in the High Impact Rating (H) above and operates any of the following:

- Any transmission Facilities recognized as Medium Impact asset as identified herein.
- Three or more Network Paths (see below) operating between 200 kV and 499 kV, and has an “aggregated weighted value” exceeding 3000 according to the table below. The aggregate weighted value for a single Control Center is determined by summing the “weight value per Path” used in Criteria 2.5 (where Network Path replace Line) for each Network Path the Control Center operates.

<table>
<thead>
<tr>
<th>Voltage Value of a Network Path</th>
<th>Weight Value per Network Path</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than 200 kV</td>
<td>(not applicable)</td>
</tr>
<tr>
<td>200 kV to 299 kV</td>
<td>700</td>
</tr>
<tr>
<td>300 kV to 499 kV</td>
<td>1300</td>
</tr>
<tr>
<td>500 kV and above</td>
<td>(not applicable)</td>
</tr>
</tbody>
</table>

- Any transmission Facilities that has been identified as part of a permanent flow gate or major transfer path.

This recommendation also includes the new term Network Path.

**Definition of Network Path:**

A collection of BES Elements forming a single transmission circuit, and bounded by two or more substations or stations.

Non-BES lines are not included in the BES line count.

4. Should the SDT revise the Control Center definition to address the TOCC issue? Please provide rationale to support your position and suggested options or language for consideration.

☐ Yes
☒ No

Comments:

Due to the Control Center use by other Standards, we recommend the SDT not revise the Control Center definition to address the TOCC issue. The SDT is evaluating options to address the TOCC issue, as described in the TOCC White Paper. Please identify options or propose solutions your entity would support and provide rationale for your position. (See Evaluation of Potential Solutions beginning on page 9 of the TOCC White Paper for additional context and discussion.)

5. The SDT is evaluating options to address the TOCC issue, as described in the TOCC White Paper. Please identify options or propose solutions your entity would support and provide rationale for your position. (See Evaluation of Potential Solutions beginning on page 9 of the TOCC White Paper for additional context and discussion.)
Comments:
The modification of Criteria 2.12 with language that removes the “functional obligation” and includes sub-criteria for the identification of medium impact Control Centers seems the most beneficial solution and would be consistent with the other existing criteria.

Creating an exemption process or a Low Impact justification process that would allow an entity to reclassify the impact level using engineering studies seems costly and would still require some sort of brightlines to measure the results of the studies against.

The “take not further action” option does not resolve either the “functional obligation” issue or the low impact determinations that NERC was attempting to address using the BETA criteria.
6. If you support criteria development in CIP-002-5.1a, Attachment 1 to solve the TOCC issue, does your entity agree with the criteria as described in the TOCC White Paper (page 9, subsection 1a. Propose revisions to CIP-002-5.1a, Attachment 1, Criterion 2.12)? Please provide rationale in the form of detailed technical justification for each criterion you support or alternative criteria and technical justification to support your response.

☐ Yes
☒ No

Comments:
We support the modification of Criteria 2.12, but do not believe there is justification for all of the whitepaper’s Criteria. We are not aware of technical justification for 200 miles of Transmission. The method for determining aggregate transmission does not consider the risk to the BES is dependent on the impact to the entire path and not the summation of each line making that path.

7. Should the considerations proposed for lower risk Transmission Owner Control Centers also be afforded to lower risk Transmission Operator Control Centers? Please provide rationale to support your response.

☒ Yes
☐ No

Comments:
As answered in earlier questions, we support Low Impact Control Centers for Transmission Operators and Transmission Owners.

8. If you have additional comments on the TOCC issue or proposed approaches that you have not provided in response to the questions above, please provide them here.

Comments: