**Unofficial Comment Form**

**Project 2016-02 Modifications to CIP Standards**

**CIP-002-6 – Transmission Owner (TO) Control Center (TOCC)**
Performing Transmission Operator (TOP) Obligations

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**Do not use** this form for submitting comments. Use the Standards Balloting and Commenting System (SBS) to submit comments on the Transmission Owner Control Center performing Transmission Operator obligations. The electronic form must be submitted by 8 p.m. Eastern, April 30, 2018.

Additional information is available on the [project page](#). If you have questions, contact Jordan Mallory at (404) 446-2589 or Mat Bunch at (404) 446-9785.

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**Background Information**

Project 2016-02 (1) addresses the Federal Energy Regulatory Commission (Commission) directives contained in Order No. 822 and (2) considers 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.
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. The proposed criterion establishes a minimum threshold for medium impact BES Cyber Systems used by and located at 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, used by and located at 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 used by and located at a Control Center or backup Control Center that is used to perform the functional obligations of the TOP that is not included in high impact rating, as medium impact BES Cyber Systems.

Questions
1. Criterion 2.12: 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:
No comment

2. Effective Date: Do you agree with the proposed modifications in CIP-002-6 to address the implementation timelines for planned and unplanned changes? If not, please provide your rationale and an alternate proposal.

☐ Yes
☐ No

Comments:

Update says
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For requirements that contain periodic obligations, initial performance of those obligations following an Unplanned Change shall occur within the first period following the date that the Implementation Period ends, as defined in the table above
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Request clarification on this “first period.” If the obligation is quarterly and the Implementation Period is 24 months, would this first period be the first quarter after those 24 months?

Request clarification on “CIP Cyber Security Standards.” Does this include only CIP-002 – CIP-011? Or more CIP Standards?

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This general process of categorization of BES Cyber Systems based on impact on the reliable operation of the BES is consistent with risk management approaches for the purpose of application of cyber security requirements in the remainder of the Version 5 CIP Cyber Security Standards.

It might be pertinent that the STD takes in consideration the change in the categorization for an existing BES cyber System considered in CIP-002-6 as an unplanned changes and gives an implementation period to comply with the new applicable requirements relative to the new categorisation. A change in the categorization for an existing BES cyber System can be from Low to Medium and can involve an certain amount of new applicable requirements that can involve for an entity a certain period of time to be compliant even tough the BES Cyber system is already impacting the BES.

3. Implementation Plan: The SDT proposes an Implementation Plan to make the revised standard effective the first day of the first calendar quarter that is three (3) calendar months after the effective date of the applicable governmental authority’s order approving the standard, or as otherwise provided for by the applicable governmental authority. Do you agree with this proposal? 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:

No comment

4. 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: