Unofficial Comment Form
Project 2016-02 Modifications to CIP Standards
CIP-002-6

Do not use this form for submitting comments. Use the Standards Balloting and Commenting System to submit comments on CIP-002-6 - Cyber Security – BES Cyber System Categorization (Transmission Owner Control Center performing Transmission Operator obligations). Comments must be submitted by 8 p.m. Eastern, Tuesday, October 9, 2018.

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

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 Transmission Owner Control Center that performs the functional obligations of a Transmission Operator.

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.
Reliability Standard CIP-002-5.1a (Impact Rating Criterion 2.6 in Attachment 1), however, references IROLs identified by Planning Coordinators and Transmission Planners. The Project 2015-09 SDT concluded that there is a need to modify CIP-002-5.1a to account for the retirement of FAC-010-3 and the elimination of a requirement for planners to identify SOLs and IROLs. The Project 2015-09 SDT developed draft language to replace the reference to such IROLs in Criterion 2.6 with other language that would allow Planning Coordinators and Transmission Planners to identify Facilities that otherwise do not meet the criteria in Section 2 of Attachment 1 but pose a higher risk to reliability such that its BES Cyber Systems should be protected as Medium Impact. In addition, the Project 2015-09 SDT recommends revising the IROLs reference in Impact Rating Criterion 2.9 in Attachment 1 to CIP-002-5.1a.

**Questions**

1. **Attachment 1, Criterion 2.6:** Do you agree with the proposed modifications in CIP-002-6 Attachment 1, Criterion 2.6? If not, please provide your rationale and an alternate proposal.

   ☒ Yes
   ☐ No

   **Comments:**

   This Requirement does not identify the information sharing mechanism from the Planning functions to the TOP/TO/GOP/GO. We understand that FAC-015 has this information sharing Requirement. We suggest this criterion update explicitly reference FAC-015 planning assessment and that FAC-015 planning assessment explicitly reference this criterion.

   We request clarification on whether the entire substation (or generator) is in scope OR specific elements in the substation (or generator)

2. **Attachment 1, Criterion 2.9:** Do you agree with the proposed modifications in CIP-002-6 Attachment 1, Criterion 2.9? If not, please provide your rationale and an alternate proposal.

   ☒ Yes
   ☐ No

   **Comments:**

   Request explanation of why changing from the older CIP (IROL) phrasing to the newer FAC (instability, cascading or uncontrolled separation) phrasing

3. **Attachment 1, Criterion 2.12:** No changes have been added from the previous 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.
4. Guidelines and Technical Basis: Do you agree with the proposed modifications to Criterion 2.6 of the Guidelines and Technical Basis section of the CIP-002-6 standard?

☐ Yes
☐ No

Comments:

We suggest this criterion update explicitly reference FAC-015 planning assessment and that FAC-015 planning assessment explicitly reference this criterion.

Suggest different wording since instability may be based instability - “Instances of instability, Cascading, or uncontrolled separation may be based on dynamic System phenomena such as instability or voltage collapse” . . . should not use the word being defined in the definition

We understand that the CIP-002 experts expects someone else to provide this operations assessment list. Why is this not explicitly stated?

Suggested revised language:

Instances of instability, Cascading, or uncontrolled separation may be based on dynamic System phenomena (e.g., voltage collapse, angular instability, transient voltage dip criteria violation).

The Standard and GTB should explicitly reference FAC-015 Requirement 4, since the Transmission Planner that performs the FAC-015 assessment needs to tell the CIP-002 Asset Classification SME which assets, if lost, would result in instability, Cascading, or uncontrolled separation. Similarly, FAC-015 should include some kind of reference back to CIP-002-6, not necessarily in Requirement 4, but perhaps in the GTB for FAC-015.
5. **Guidelines and Technical Basis**: Do you agree with the proposed modifications to Criterion 2.9 of the Guidelines and Technical Basis section of the CIP-002-6 standard?

☐ Yes
☒ No

Comments:

Is criterion 2.9 associated with any other NERC Standards / Requirements like 2.6? If yes, what other NERC Standards / Requirements?

Criterion 2.9 in the GTB includes a “Wide Area” qualifier that is not present in the version of criterion 2.9 in Attachment 1 – Impact Rating Criteria. Recommend removing the term “Wide Area” from the GTB.

6. **Implementation Plan**: The SDT proposes an Implementation Plan to make the revised standard effective the first day of the first calendar quarter that is fifteen (15) 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:

7. 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: