Unofficial Comment Form
Project 2016-02 Modifications to CIP Standards
CIP-012-1

Do not use this form for submitting comments. Use the Standards Balloting and Commenting System to submit comments on CIP-012-1 – Cyber Security – Communications between Control Centers. Comments must be submitted by 8 p.m. Eastern, Monday, July 2, 2018.

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

Background
On January 21, 2016, the Commission issued Order No. 822, approving seven CIP Reliability Standards and new or modified definitions, and directing modifications to the CIP Reliability Standards. Among others, the Commission directed NERC to “develop modifications to the CIP Reliability Standards to require responsible entities to implement controls to protect, at a minimum, communication links and sensitive bulk electric system data communicated between bulk electric system Control Centers in a manner that is appropriately tailored to address the risks posed to the bulk electric system by the assets being protected (i.e., high, medium, or low impact).” (Order 822, Paragraph 53)

The Project 2016-02 Standard Drafting Team (SDT) drafted Reliability Standard CIP-012-1 to require Responsible Entities to implement controls to protect sensitive Bulk Electric System (BES) data while being transmitted over communications links between BES Control Centers. Due to the sensitivity of the data being communicated between the Control Centers, the standard applies to all impact levels (i.e., high, medium, or low impact).

The SDT drafted CIP-012-1 allowing Responsible Entities to apply protection to the links, the data, or both, in order to satisfy the security objective consistent with the capabilities of the Responsible Entity’s operational environment. Requirement R1 requires Responsible Entities to implement, except under CIP Exceptional Circumstances, one or more documented plans that protect Real-time Assessment and Real-time monitoring data while being transmitted between Control Centers. The plan(s) must address how the Responsible Entity will mitigate the risk of unauthorized disclosure or modification of the applicable data.
Questions

1. Control Center Exemption Language: The SDT drafted Exemption language in the Applicability section specifically for CIP-012-1 to exempt Control Centers that only transmit data pertaining to a single co-located substation or generating plant. Do you agree with this revision? If not, please provide the basis for your disagreement and an alternate proposal.

☐ Yes
☐ No

Comments:

2. Requirement R1: The SDT modified Requirement R1 to state: “The Responsible Entity shall implement, except under CIP Exceptional Circumstances, one or more documented plan(s) to mitigate the risk of unauthorized disclosure or modification of Real-time Assessment and Real-time monitoring data while being transmitted between any applicable Control Centers. The Responsible Entity is not required to include oral communications in its plan.” Do you agree with this revision? If not, please provide the basis for your disagreement and an alternate proposal.

☐ Yes
☐ No

Comments:

Is <<Real-time monitoring data>> the same as operational data? Operational data is in other Standards

3. Implementation Plan: The SDT established the Implementation Plan to make the standard effective the first day of the first calendar quarter that is twenty-four (24) 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 implementation time period is needed, please provide a detailed explanation of actions and time needed to meet the implementation deadline.

☐ Yes
☐ No

Comments:
Considering the complexity, it is estimated that 36 calendar months would be required to comply.

4. Technical Rationale: The SDT modified the draft Technical Rationale for CIP-012 to further explain the need for the exemption for certain Control Centers. Do you agree with the explanations and included diagrams in the draft Technical Rationale? If you do not agree, or if you agree but have comments or suggestions for the draft Technical Rationale, please provide your recommendation and explanation.
Comments:
We feel that the example presented in the Technical Guidance reflects the Exemption accurately, however, the SDT is compounding the Control Center issue by having another explanation of a Control Center/control center to those already present in CIP-002, CIP-014, and the NERC Glossary, and now CIP-012. We recommend a single document that explains the Control Center / control center topic.

5. The SDT modified the draft Implementation Guidance for CIP-012 to provide examples of how a Responsible Entity could comply with the requirements. The draft Implementation Guidance does not prescribe the only approaches to compliance. Rather, it describes what the SDT believes would be effective ways to comply with the standard. See NERC’s Compliance Guidance policy for information on Implementation Guidance. Do you agree with the draft Implementation Guidance? If you do not agree, or if you agree but have comments or suggestions for the draft Implementation Guidance, please provide your recommendation and explanation.

 Comments:

6. The SDT believes proposed CIP-012-1 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 improvement to enable more cost effective approaches, please provide your recommendation and, if appropriate, technical justification.

 Comments: