Unofficial Comment Form
Project 2015-INT-01 Interpretation of CIP-002-5.1
for Energy Sector Security Consortium (EnergySec)

Do not use this form for submitting comments. Use the electronic form to submit comments on the Interpretation of CIP-002-5.1 for Energy Sector Security Consortium (EnergySec) developed by the standards drafting team (SDT) for Project 2016-02 Modifications to CIP Standards. The electronic form must be submitted by 8 p.m. Eastern, Monday, September 12, 2016.

Additional information is available on the project page. If you have questions, contact either Senior Standards Developer, Stephen Crutchfield at (609) 651-9455 or Al McMeekin at (404) 446-9675 here.

Background Information
EnergySec submitted a Request for Interpretation (RFI) seeking clarity regarding CIP-002-5.1, Requirement 1, Attachment 1, Part 2.1. The RFI asks whether the language “shared BES Cyber Systems” refers to discrete BES Cyber Systems that are shared by multiple units, or whether instead it refers to groups of BES Cyber Systems that, collectively, could impact multiple units. Essentially, the RFI seeks clarity regarding whether the evaluation required under Requirement R1 should be performed individually for each discrete BES Cyber System at a single plant location, or instead, applied collectively for groups of BES Cyber Systems.

The Standards Committee (SC) accepted the RFI at the September 23, 2015 meeting. However, on December 9, 2015, the SC endorsed deferring consideration of the RFI until the SDT for Project 2016-02 Modifications to CIP Standards was formed and could serve as the Interpretation Drafting Team (IDT).

In reviewing the RFI, the IDT identified three distinct questions within the request and developed this interpretation pursuant to the NERC Guidelines for Interpretation Drafting Teams.

The three questions are:

1. Whether the phrase “shared BES Cyber Systems” means that the evaluation for Criterion 2.1 shall be performed individually for each discrete BES Cyber System at a single plant location, or collectively for groups of BES Cyber Systems?

2. Whether the phrase “shared BES Cyber Systems” refers to discrete BES Cyber Systems that are shared by multiple units, or groups of BES Cyber Systems that could collectively impact multiple units?

3. If the phrase applies collectively to groups of BES Cyber Systems, what criteria should be used to determine which BES Cyber Systems should be grouped for collective evaluation?
The IDT requests you review the RFI, the associated standard, and the proposed interpretation before answering the following questions. You do not have to answer all of the questions. Enter all comments in simple text format.

This posting is soliciting comments through a 45-day formal comment period with an initial ballot during the last 10 days of the comment period.

**Questions**

1. Do you agree with the response to **Question 1**? If not, please provide the basis for your disagreement and an alternate proposal.

   - [ ] Yes
   - [ ] No
   
   Comments:
   We agree with the response to Question 1.

2. Do you agree with the response to **Question 2**? If not, please provide the basis for your disagreement and an alternate proposal.

   - [ ] Yes
   - [ ] No
   
   Comments:
   We agree with the response to Question 2.

3. Do you agree with the response to **Question 3**? If not, please provide the basis for your disagreement and an alternate proposal.

   - [ ] Yes
   - [ ] No
   
   Comments:
   We agree with the response to Question 3.