RSAW Comment Form
Standard CIP V5

Please complete the RSAW Comment Form and email it to RSAWfeedback@nerc.net. Due to the amount of comments NERC receives, we will not accept attachments or comments submitted in another format.

Commenter Information
Name: Guy Zito
Phone Number: 1-212-840-1070
Email Address: GZito@NPCC.org
Region(s): NPCC

RSAW
Do you disagree with any Compliance Assessment Approach listed in this RSAW? Yes or No
If yes, please state the applicable requirement, the requested evidence with which you disagree, and why you disagree:

We agree with the Compliance Approach in this RSAW except for the comments below.

This Self-Reporting second paragraph on page 3 introduces a new Requirement. We suggest that Requirements belong in the Standard and suggest that “list” be replaced by “evidence.”

The CEA can expect the Responsible Entity to have maintained a list of the deficiencies it identified as presenting minimal risk to bulk electric system reliability and shall, in that list, indicate:

- the date the Responsible Entity identified the deficiency and the nature of the deficiency,
- how the Responsible Entity determined the risk of the deficiency,
- the manner of correction, the name of the person that reviewed the completion of correction, and the date of the completion of correction.

This recommendation also changes the next paragraph. After changes the two paragraphs read
The CEA can expect the Responsible Entity to have maintained evidence of the deficiencies it identified as presenting minimal risk to bulk electric system reliability and shall, in that evidence, indicate:

- the date the Responsible Entity identified the deficiency and the nature of the deficiency,
- how the Responsible Entity determined the risk of the deficiency,
- the manner of correction, the name of the person that reviewed the completion of correction, and the date of the completion of correction.

The CEA may ask to review this evidence, and may utilize it to understand the entity’s culture of compliance and culture of security. Depending upon the confidence the CEA has in the entity’s culture of compliance and culture of security, the CEA may review the evidence or may sample from the evidence to confirm the deficiencies did not create a high risk to the reliability of the bulk power system.

Please provide guidance on how the “culture of security” will be measured (third Self-Reporting paragraph on page 3).

The CEA may ask to review this list, and may utilize it to understand the entity’s culture of compliance and culture of security.

How can the Entity Self-Report when it does not identify (bottom of page 3)? Suggest that #2 should be changed to “where the entity did not assess or correct deficiencies that it has identified, or”

Entities are expected to self-report:
1. deficiencies that created a high risk to the reliability of the bulk power system, or
2. where the entity did not identify, assess or correct deficiencies, or
3. where the entity chooses not to identify, assess, or correct deficiencies.
General Comments
Do you have any other general comments regarding the RSAW? Yes or No
If yes, explain: