Unofficial Comment Form
Project 2009-26 Interpretation of CIP-004-1 for the Western Electricity Coordinating Council

Please DO NOT use this form to submit comments. Please use the electronic comment form located at the link below to submit comments on the Interpretation of CIP-004-1 for the Western Electricity Coordinating Council (Project 2009-26). The electronic comment form must be completed by March 23, 2012.

http://www.nerc.com/filez/standards/Project2009-26_CIP-004-1_RFI_WECC.html

If you have questions please contact Steven Noess at steven.noess@nerc.net or by telephone at (404) 446-9691.

Background Information
An initial ballot for this interpretation closed on January 19, 2010, with a quorum of 84.21% and an approval of 42.24%. Since that date, a project team from the CIP Interpretation Drafting Team (“IDT”) has reviewed and responded to the comments received from that posting and made revisions to the interpretation of WECC’s Request for Interpretation. The project team revised the interpretation pursuant to the NERC Guidelines for Interpretation Drafting Teams. In consideration of the Guidelines for Interpretation Drafting Teams, the IDT considered the requirement language in the standard as written in order to provide clarity on the meaning of the standard, and the IDT believes that the meaning of the standard informs the proper reach of the standard.

In their Request for Interpretation, WECC asked for clarity on the definition of “authorized access” as applied to temporary support from vendors. WECC also asks whether the requirements specified in CIP-004-1, R2, R3, and R4, apply to vendors who are supervised, whether by remote terminal access or escorted physical access.

The IDT determined that, as written, all cyber access to Critical Cyber Assets must be authorized, and all authorized access must comply with Requirements R2, R3, and R4. The IDT recognizes there may be tools that allow escorted cyber access, but compared to “physical access,” the concept or any words relating to “escorting” or “supervision” in the requirement language is absent relative to cyber access.

In response to the portion of WECC’s question related to “supervision,” the IDT does not believe the standard allows for escorted or supervised cyber access to cyber assets, but agrees that the standard does allow for escorted or supervised physical access to cyber assets, as explained in the revised interpretation language.
The IDT notes that it is limited in its response to a request for interpretation to the clarification that it has provided. The interpretation drafting team must consider the request for interpretation within the confines of the NERC “Guidelines for Interpretation Drafting Teams,” and it realizes that in some cases, some entities may not desire the outcome of this interpretation. However, it is not the role of an IDT to change a Reliability Standard or its applicability through an interpretation. The team understands that some may disagree with the outcome of this interpretation, and it notes that the greater standards development process is better equipped to weigh those concerns, if any. Revising a standard is outside the scope of the “Guidelines for Interpretation Drafting Teams” that “[a]n interpretation may only clarify or interpret the requirements of an approved Reliability Standard, . . .” Furthermore, an interpretation is limited and may not “address a gap or perceived weakness in the approved Reliability Standard[].”

You do not have to answer all questions. Enter All Comments in Simple Text Format. Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

Please review the request for an interpretation, the associated standard, and the draft interpretation and then answer the following questions.

1. The NERC Board of Trustees indicated that the interpretation process should not be used to address requests for a decision on “how” a reliability standard applies to a registered entity’s particular facts and circumstances. Do you believe this request for an interpretation is asking for clarity on the meaning of a requirement or clarity on the application of a requirement?
   - The request is asking for clarity on the meaning of a requirement.
   - The request is asking for clarity on the application of a requirement.
   Comments:

2. The NERC Board of Trustees indicated that in deciding whether or not to approve a proposed interpretation, it will use a standard of strict construction and not seek to expand the reach of the standard to correct a perceived gap or deficiency in the standard. Do you believe this interpretation expands the reach of the standard?
   - The interpretation expands the reach of the standard.
   - The interpretation does not expand the reach of the standard.
   Comments:

3. Do you agree with this interpretation? If not, please explain specifically what you disagree with.
   - Yes
   - No
   Comments: