

# Unofficial Comment Form

## Project 2020-04 Modifications to CIP-012

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System \(SBS\)](#) to submit comments on **Project 2020-04 Modifications to CIP-012** by **8 p.m. Eastern, May 11, 2020**.

Additional information is available on the [project page](#). If you have questions, contact Senior Standards Developer, [Latrice Harkness](#) (via email), or at 404-446-9728.

### Background Information

The purpose of this project is to address a directive issued by the Federal Energy Regulatory Commission (FERC) in Order No. 866 to develop modifications to the CIP Reliability Standards to require protections regarding the availability of communication links and data communicated between the bulk electric system Control Centers.

In Order No. 866, FERC stated that “maintaining the availability of communication networks and data should include provisions for incident recovery and continuity of operations in a responsible entity’s compliance plan.” FERC recognized that the redundancy of communication links cannot always be guaranteed, and acknowledged there should be plans for both recovery of compromised communication links and use of backup communication capability. The proposed scope of this project would entail modifications to CIP-012 – Communications between Control Centers

## Questions

1. Do you agree with the proposed scope as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.

Yes  
 No

Comments:

We agree with the proposed scope because it is consistent with the FERC Directive.

We suggest including the directive from FERC Order 866 in the “Project Scope” section, “The commission directs NERC to develop modifications to the CIP Reliability Standards to require protections regarding the availability of communication links and data communicated between bulk electric system Control Centers.”

2. Provide any additional comments for the SAR drafting team to consider, if desired.

Comments:

We expect that the Requirements will focus on a plan since the Entity cannot guarantee a third party’s availability or reliability

We request that Standard Drafting Team not prescribe technical solution(s)

Also, we suggest that the SAR drafting team consider the CIP-012 relationship to TOP-003 and IRO-10, and the SAR involving Operational Data Exchange simplification – Standards Efficiency Review Phase 2.

We suggest that the “Purpose and Goal” section should state the reliability related benefits, as described in the FERC Order.

We suggest that the “To assist the NERC Standards Committee in appointing a drafting team...” section should not include the Distribution Provider function, since the scope involves the availability of communication links and data communicated between bulk electric system Control Centers.