

From: [Guy V. Zito](#)
To: [rsballot](#)
Cc: [rsc](#); "[Nelson, Donald E. \(DPU\)](#)"; "[Michael Bilheimer](#)"; [rjfalsetti@cogeco.ca](#)
Subject: NERC Ballot- Project 2016-02 Modifications to CIP Standards | Additional Ballots and Non-binding Poll Open through December 5, 2016
Date: Thursday, December 1, 2016 9:35:17 AM
Attachments: [image003.png](#)
Importance: High

NPCC Members and Entities of the NERC Registered Ballot Body,

As noted in the NERC Announcement below, the CIP-003-7 is open for an initial ballot through **8pm December 5th, 2016**. The NPCC Regional Standards Committee (RSC) has reviewed the subject posted materials. The RSC has not reached a full consensus on a ballot recommendation for the Region however a majority of the RSC will voting to support the standard and non-binding poll. As information, RSC submits the following information:

The NPCC Task Force on Infrastructure Information and Technology (TFIST) has reviewed the posted materials. Some members of the TFIST expressed concerns as follows.

Implementation Plan – too short, TFIST suggests 18 months instead of 12 months
CIP-003-7 – TFIST is concerned with the “should” language appearing in the examples in the guideline and technical basis section of the standard

The project page may be found here: <http://www.nerc.com/pa/Stand/Pages/Project%202016-02%20Modifications%20to%20CIP%20Standards.aspx>

When considering your organization’s position, please keep in mind that there is a directive associated with this standard, specifically as it relates to the definition of “Low Impact External Routable Communications” (LERC). NERC is required to file a revision to this standard by April 1, 2017 to address this directive. In consideration of the above and the issues that TFIST identified with the standard, which are not the part of the standard deemed to approved by FERC and not enforceable; **NPCC will be casting its vote, as the Regional Entity, to accept the Standard, Implementation Plan, and also voting positive on the non-binding poll.** The Implementation Plan may be subject to change to our suggested change to 18 months if there is enough concern, however due to the importance of this issue at FERC, NPCC as the Regional Entity, will also support the shorter “as drafted” implementation plan of 12 months. Also, should this fail at ballot there may be an issue with NERC being able to develop another draft and have it approved by stakeholders and the NERC BOT in time to meet the deadline. I am unaware of any NERC filing for an extension for more time. I have had a discussion with the NERC Standards Developer for this project and he indicated he would be discussing the NPCC issues with the SDT after the initial ballot. We doesn’t believe any of the changes NPCC suggests, and will be submitting as comments, would constitute a substantive change so even if the ballot passes there would not need to be an additional ballot conducted prior to a final ballot. Further discussion will be conducted with the standard drafting team.

Additionally, there is a desire by NERC to make additional changes to this standard which include, but may not be limited to addition of the Transit Cyber Asset requirement (CIP-007-TCA) and the Exceptional Circumstances definition which will outline when an entity does not have to comply with the CIP Standards during emergencies. All these other revisions are in progress and although part of the project, are not up for ballot at this time.

If there are any questions please contact me.

Best Regards,

Guy V. Zito
Chair RSC
Asst. Vice President – Standards
Northeast Power Coordinating Council, NPCC
212-840-1070

From: NERC Standards Announcements (Do Not Reply) [<mailto:NERC-StandardsAnnouncements-DoNotReply@nerc.net>]

Sent: Wednesday, November 23, 2016 10:54 AM

To: cip_mod_sdt_plus <cip_mod_sdt_plus@nerc.com>

Cc: Al McMeekin <Al.McMeekin@nerc.net>; Sean Cavote <Sean.Cavote@nerc.net>

Subject: Project 2016-02 Modifications to CIP Standards | Additional Ballots and Non-binding Poll Open through December 5, 2016



Standards Announcement

Reminder

Project 2016-02 Modifications to CIP Standards

Additional Ballots and Non-binding Poll Open through December 5, 2016

[Now Available](#)

The following ballots are open through **8 p.m. Eastern, Monday, December 5, 2016**:

- 1. Additional ballot for CIP-003-7 - Cyber Security – Security Management Controls**
- 2. Additional ballot for CIP-003-7 Implementation Plan**
- 3. Non-binding poll of the associated Violation Risk Factors and Violation Severity Levels**

Balloting

Members of the ballot pools associated with this project may log in and submit their vote for the standard and its implementation plan, and the non-binding poll by clicking [here](#). If you experience any difficulties in using the electronic form, contact [Wendy Muller](#).

If you are having difficulty accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out, contact NERC IT support directly at <https://support.nerc.net/> (Monday – Friday, 8 a.m. - 5 p.m. Eastern).

Next Steps

The ballot results will be announced and posted on the project page. The drafting team will review all responses received during the comment period and determine the next steps of the project.

For information on the Standards Development Process, refer to the [Standard Processes Manual](#).

For more information or assistance, contact Senior Standards Developer, [Al McMeekin](#) (via email) or at (404) 446-9675.

3353 Peachtree Road NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

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