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Subject: NERC Ballot - CIP-012-1, – Cyber Security- Control Center Communication Networks
Date: Friday, September 1, 2017 6:28:15 PM

NPCC Members and Entities of the NERC Registered Ballot Body,

The NPCC Task Force on Infrastructure Technology (TFIST) and the Regional Standards Committee (RSC) have reviewed the subject standard currently posted for an initial ballot and a non-binding poll of the Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) through 8pm September 11, 2017.

The TFIST has not reached full consensus on supporting the standard as written. Issues identified pertain to the communication link between control centers and what the demarcation point is for compliance and the Implementation Plan which specifies full compliance the first day of the first calendar quarter 12 months following the effective day of the applicable governmental approval. This may be sufficient for R1 to develop a plan to mitigate risk of the unauthorized disclosure or modification of specific data, however longer timeframes would be beneficial to the industry and should be allowed to implement the plan, as specified in R2.

The RSC members have not indicated any intent to cast a negative voting position. NPCC as the Regional Entity will be submitting comments reflecting the concerns expressed by TFIST and casting an **AFFIRMATIVE** vote to support the standard and a **POSITIVE** vote for the non-binding poll. Also, please note that the proposed definition of “Control Center” and the “Technical Rationale for and Justification for CIP-012-1 – Cyber Security- Control Center Communication Networks” are also posted for 30 day informal comment periods through 8pm September 12, 2017.

Please contact me with any questions.

Thanks,

Guy V. Zito

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