

**From:** [Guy V. Zito](#)  
**To:** [rscmembers](#)  
**Subject:** NERC Comment Period and Initial Ballot - 2019-03 Cyber Security Supply Chain Risks  
**Date:** Wednesday, February 26, 2020 7:15:54 AM  
**Importance:** High

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RSC Members,

The subject project is currently in a 45 day comment period until March 11, 2020. There is an initial ballot commencing on March 2, 2020 and ending on March 11, 2020. The RSC discussed this at our last meeting and since then TFIST has reviewed the three draft revised standards and proposed Implementation Plan associated with the subject project:

- CIP-005-7 – Cyber Security - Electronic Security Perimeter(s)
- CIP-010-4 – Cyber Security - Configuration Change Management and Vulnerability Assessments
- CIP-013-2 – Cyber Security - Supply Chain Risk Management
- Implementation Plan

Recall that this project was initiated to be responsive to the FERC Order No. 850. FERC directed NERC to submit modifications to address Electronic Access Control and Monitoring Systems (EACMS), specifically those systems that provide electronic access control to high and medium impact BES Cyber Systems. Directives associated with the EACMS revisions(s) were required to be submitted to FERC for approval within 24 months from the effective date of Order No. 850. FERC also had a “recommendation” regarding Physical Access Control Systems (PACS) that provide physical access control (excluding alarming and logging) to high and medium impact BES Cyber Systems. There is no regulatory deadline for the recommended changes associated with the PACS.

While TFIST is supportive of the revisions to the standards to address the EACMS FERC Directive, there is concern regarding the changes made to address the FERC recommendation regarding PAC. There is a need to evaluate the risk and implementation of the proposed PACS and determine the cost benefit of addressing the risk. Additionally, with regard to the Implementation Plan, the TFIST recommends a longer period of 18-24 months, rather than the 12 proposed by the NERC SDT. TFIST has recommended a “No” vote on both the three standards and Implementation Plan.

Please let me know your ballot intent as soon as possible. **At this time, due to the FERC Directive on EACMS, and in consideration of the TFIST concerns, NPCC as the Regional Entity is contemplating an Abstention.**

Thanks,

Guy V. Zito  
NPCC Asst. Vice President – Standards  
Chair, Regional Standards Committee