

# Unofficial Comment Form

## Project 2012-INT-05 – Interpretation of CIP-002-3 for OGE

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-002-3, Requirement R1, for OGE (Project 2012-INT-05). The electronic comment form must be completed by 8 p.m. ET, **December 20, 2012**.

[http://www.nerc.com/filez/standards/2012-INT-05 Interpretation CIP-002-3 OGE.html](http://www.nerc.com/filez/standards/2012-INT-05%20Interpretation%20CIP-002-3%20OGE.html)

If you have questions please contact Steven Noess at [steven.noess@nerc.net](mailto:steven.noess@nerc.net) or by telephone at 404.446.9691.

### Background Information

This posting is soliciting formal comment through a 45-day formal comment period with an initial ballot in the last 10 days of the formal comment period.

In May 2011, the Standards Committee appointed a standing CIP Interpretation Drafting Team for the development of CIP Interpretations. A project team from the CIP Interpretation Drafting Team has reviewed OGE's request for interpretation and developed this interpretation pursuant to the NERC Guidelines for Interpretation Drafting Teams. (Available at: [http://www.nerc.com/files/Guidelines for Interpretation Drafting Teams Approved April 20 11.pdf](http://www.nerc.com/files/Guidelines%20for%20Interpretation%20Drafting%20Teams%20Approved%20April%2011.pdf))

The stated purpose of CIP-002-3 is, in part, to “provide a cyber security framework for the identification and protection of Critical Cyber Assets *to support reliable operation of the Bulk Electric System.*” (emphasis added). Paragraph 4 of the purpose specifies that CIP-002-3 “requires the identification and documentation of the Critical Cyber Assets associated with the Critical Assets *that support the reliable operation of the Bulk Electric System. These Critical Assets are to be identified through the application of a risk-based assessment.*” (emphasis added).

The Interpretation Drafting Team notes that Advanced Meter Infrastructure (AMI) and other such equipment may be capable of being purposed for use on distribution or transmission facilities. The CIP standards are not applicable to Distribution Providers, but they are applicable to the Critical Assets that support the reliable operation of the BES. Therefore, this interpretation is only applicable to BES assets. Registered Entities such as OGE may first evaluate where AMI equipment is used. If it is solely placed on their distribution facilities, the CIP standards are not applicable. If the equipment is placed on BES assets, the purpose must be evaluated for possible inclusion in the risk-based assessment methodology (RBAM).

Pursuant to CIP-002-3, Requirement R1, the Responsible Entity must identify and document an RBAM and use the RBAM to identify its Critical Assets, if any. In determining which of its assets may constitute Critical Assets, the RBAM shall consider, pursuant to CIP-002-3, Requirement R1.2.5: “Systems and facilities critical to automatic load shedding under a common control system capable of shedding 300 MW or more.”

To the extent something is “critical to automatic load shedding under a common control system capable of shedding 300 MW or more” for the purpose of supporting reliable operation of the Bulk Electric System, the RBAM shall consider that system or facility. The RBAM drives a facts- and circumstance-based determination, which is not dependent on technology or specific types of systems or facilities. The IDT acknowledges that AMI is one of several technologies that a Responsible Entity may consider in determining applicability under CIP-002-3. AMI is an example of a technology to consider under an RBAM.

The interpretation drafting team notes that Requirement R1.2 requires the RBAM to “consider” whether the assets described in Requirement R1.2.5 should be designated as Critical Assets. Each year, during the annual approval required under Requirement R4, a Responsible Entity that owns an AMI system should re-consider whether its AMI system is a Critical Asset pursuant to Requirement R1.2.5.

Applying these requirements to the remote connect or disconnect functionality associated with AMI, the drafting team concludes in its interpretation that AMI is not a Critical Asset under R1.2.5 so long as the AMI is not designed to or cannot, without human operator intervention, shed a load of 300MW or more.

**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 question.

1. Do you agree with this interpretation? If not, what, specifically, do you disagree with? Please provide specific suggestions or proposals for any alternative language.

Yes

No

Comments: