

Unofficial Comment Form

Project 2016-02 Modifications to CIP Standards Standards Authorization Request (SAR)

Do not use this form for submitting comments. Use the [electronic form](#) to submit comments on the Project 2016-02 Modifications to CIP Standards SAR. The electronic comment form must be submitted by **8 p.m. Eastern, Thursday, April 21, 2016**.

Documents and information about this project are available on the [Project 2016-02 Modifications to CIP Standards](#). If you have questions, contact either Senior Standards Developer, [Stephen Crutchfield](#) at (609) 651-9455 or [Al McMeekin](#) at (404) 446-9675.

Background Information

On January 21, 2016, FERC issued [Order No. 822](#), *Revised Critical Infrastructure Protection Reliability Standards*, approving seven CIP Reliability Standards and new or modified definitions. FERC also directed NERC to develop modifications to address:

- Protection of transient electronic devices used at low-impact bulk electric system cyber systems;
- Protections for communication network components between control centers; and
- Refinement of the definition for Low Impact External Routable Connectivity (LERC)

FERC directed NERC to submit new or modified standards responding to the directives related to the definition of LERC by March 30, 2016, one year from the effective date of Order No. 822. FERC did not place any time frame for NERC to respond to the remaining directives.

The CIP Version 5 Transition Advisory Group (V5 TAG) transferred issues to the CIP Version 5 Standard Drafting Team (SDT) that were identified during the industry transition to implementation of the CIP Version 5 Standards. Specifically, the issues that the SDT will address are:

- Cyber Asset and BES Cyber Asset Definitions
- Network and Externally Accessible Devices
- Transmission Owner Control Centers Performing Transmission Operator Obligations
- Virtualization

On March 9, 2016, the NERC Standards Committee accepted and authorized the posting of the Modifications to CIP Standards SAR. It is posted for a 30-day informal comment period because it is addressing FERC directives.

Questions

1. Do you agree with the scope and objectives of this SAR? If not, please explain why you do not agree, and, if possible, provide specific language revisions that would make it acceptable to you.

Yes:

No:

Comments:

Request that the scope of virtualization be expanded beyond only CIP-005. Want to remind the SDT that communications between Control Centers usually involves third parties that tend to be outside of FERC's jurisdiction.

2. Are you aware of any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standards? If yes, please identify the jurisdiction and specific regulatory requirements.

Yes:

No:

Comments:

3. Are there any other concerns with this SAR that haven't been covered in previous questions?

Yes:

No:

Comments: Request that the SAR explicitly reference the correct title of the V5 TAG document, which we believe is "CIP V5 Issues for Standard Drafting Team Consideration," dated on September 15, 2015.