

# Unofficial Comment Form

## Project 2016-02 Modifications to CIP Standards CIP-012-1

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System \(SBS\)](#) to submit comments on the draft **Technical Rationale and Justification and Implementation Guidance for CIP-012-1**. Comments must be submitted by **8 p.m. Eastern, Monday, December 11, 2017**.

Additional information is available on the [project page](#). If you have questions, contact [Katherine Street](#) at (404) 446-9702 or [Mat Bunch](#) at (404) 446-9785.

### Background Information

On January 21, 2016, the Commission issued Order No. 822, approving seven CIP Reliability Standards and new or modified definitions, and directing modifications to the CIP Reliability Standards. Among others, the Commission directed NERC to “develop modifications to the CIP Reliability Standards to require responsible entities to implement controls to protect, at a minimum, communication links and sensitive bulk electric system data communicated between bulk electric system Control Centers in a manner that is appropriately tailored to address the risks posed to the bulk electric system by the assets being protected (i.e., high, medium, or low impact).” (Order 822, Paragraph 53)

The Project 2016-02 Standard Drafting Team (SDT) drafted Reliability Standard CIP-012-1 to require Responsible Entities to implement controls to protect sensitive Bulk Electric System (BES) data while being transmitted over communications links between BES Control Centers. Due to the sensitivity of the data being communicated between the Control Centers the standard applies to all impact levels (i.e., high, medium, or low impact).

The SDT drafted Technical Rationale and Justification for Reliability Standard CIP-012-1 to explain the technical rationale for the proposed Reliability Standard. It provides stakeholders and the ERO Enterprise with an understanding of the technology and technical requirements in the Reliability Standard. It also contains information on the SDT’s intent in drafting the requirements.

The SDT also drafted Implementation Guidance to provide examples of approaches to comply with CIP-012-1. Implementation Guidance does not prescribe the only approach, but is intended to highlight one or more approaches that would be effective ways to be compliant with the standard. As Implementation Guidance is only meant to provide examples, entities may choose alternative approaches that better fit their situation.

## Questions

1. The SDT developed draft Technical Rationale and Justification for CIP-012 to assist in understanding the technology and technical requirements in the Reliability Standard. It also contains information on the SDT's intent in drafting the requirements. Do you agree with the technology and technical requirements in the draft Technical Rationale and Justification? If you do not agree, or if you agree but have comments or suggestions for the draft Technical Rationale and Justification, please provide your recommendation and explanation.

Yes

No

Comments:

2. The SDT developed draft Implementation Guidance for CIP-012 to provide examples of how a Responsible Entity could comply with the requirements. The draft Implementation Guidance does not prescribe the only approach to compliance. Rather, it describes some approaches the SDT believes would be effective ways to comply with the standard. See NERC's Compliance Guidance policy for information on Implementation Guidance. Do you agree with the example approaches in the draft Implementation Guidance? If you do not agree, or if you agree but have comments or suggestions for the draft Implementation Guidance, please provide your recommendation and explanation.

Yes

No

Comments: