Background Information

In Order No. 866, FERC stated that “maintaining the availability of communication networks and data should include provisions for incident recovery and continuity of operations in a responsible entity's compliance plan.” FERC recognized that the redundancy of communication links cannot always be guaranteed, and acknowledged there should be plans for both recovery of compromised communication links and use of backup communication capability. The proposed scope of this project would entail modifications to CIP-012 – Communications between Control Centers.

The purpose of this project is to address a directive issued by the Federal Energy Regulatory Commission (FERC) in Order No. 866 to develop modifications to the CIP Reliability Standards to require protections regarding the availability of communication links and data communicated between the bulk electric system Control Centers.
Questions

1. The SDT revised CIP-012-1 and added R2 to meet the directives outlined in FERC Order No. 866 seeking to provide for the availability of real-time assessment and real-time monitoring data while in transit between control centers. Do you agree with the proposed R2 language? If not please provide comments and suggested requirement language.

☐ Yes
☒ No

Comments:
Availability is outside of most entities’ control because of outsourcing communications between locations. Also, IRO-010, TOP-003, and COM Standards address availability already. Previously industry gave this feedback. We recommend this SDT supports the earlier industry feedback.

The SDT should use the same language as R1, i.e., talk only about the data and not communication links. We suggest the following wording:
The Responsible Entity shall implement, except under CIP Exceptional Circumstances, one or more documented plan(s) to provide for the availability of data used for Real-time Assessment and Real-time monitoring while being transmitted between Control Centers.

R1 makes reference to communications “between any applicable Control Centers”, while the proposed R2 is a more general “between Control Centers”. Overall, this revision should clearly state that these requirements are only applicable to communications between “applicable” Control Centers.
NOTE: the summary of R2 in the Technical Rationale document states “Between applicable Control Centers”

2. The SDT proposes that the modifications in CIP-012-2 meet the FERC directives in a cost effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement
to enable more cost effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

☐ Yes  ☒ No

Comments:
Per the comment to #1, we suggest availability is already covered by other Standards.

The SDT is forcing the entities to invest in at least two means (communication links and data) to achieve its goal of data availability. The SDT should allow the entities the flexibility to ensure the availability of the data, in whichever means deemed sufficient by the entity.

3. The SDT is proposing a 24-month implementation plan. Do you agree with the proposed timeframe? If you think an alternate timeframe is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.

☒ Yes  ☐ No

Comments:
We agree with the proposed 24-month implementation plan.
Request clarification on unplanned changes. What is the implementation plan for unplanned changes?

4. Provide any additional comments for the standard drafting team to consider, including the provided technical rationale document, if desired.

Comments:
Request clarification/example of a CIP Exceptional Circumstance for R2 since this requirement seems focused on contingencies.