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 R1 to address the comments received during initial ballot and 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 that the proposed language in R1 addresses security and availability as identified in FERC Order No. 866? If not please provide comments and suggested requirement language.

☐ Yes
☒ No

Comments:
The inclusion of “availability” in R1 is not well defined. R1’s availability is subtly but importantly different than the question. The question adds “data while in transit between control centers.” We recommend adding this language to R1.

Per previous feedback, in most cases, communications between Control Centers are handled by a third party. If that third party cannot provide communications, the Service Level Agreement provides compensation but does not guarantee availability. IRO-002 and TOP-001 already have Requirements that mandate diversity and redundancy as they pertain to communications. It is not clear that diversity and redundancy equate to availability. We recommend removing availability from CIP-012 since other Standards cover this topic OR moving availability to other Standard(s).

2. Do you believe that you can demonstrate compliance with R1.3 to identify where your availability protections are applied? If not please provide comments and suggested requirement language.

☐ Yes
☒ No

Comments:
“Availability” is not well defined. Availability of data? Availability of the application? See feedback to question 1

The double jeopardy question with IRO and TOP Standards needs addressing. The SDT’s December 8, 2021 webinar raised this question.

We recommend removing availability from CIP-012 since other Standards cover this topic OR moving availability to other Standard(s)

How does CIP-012 distinctly cover any gaps that are not covered in other Standards?
3. 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:

4. The last ballot showed industry approval of the proposed 24-month implementation plan. Do you still agree the proposed timeframe is appropriate in light of the proposed revisions to the standard language? 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 cannot answer until we understand what “availability” means and the availability’s scope. Scope refers to how deeply an entity must depend on other companies. We request clarification on 1) what availability means and 2) what is availability’s scope.

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

Comments:
We request that future posting of all CIP Standards include a redline to the last approved. This redline will help SMEs determine the change and thereby complete comment forms faster.

The Implementation Guidance refers to a NIST definition of availability. NIST could change its definition without notifying entities. NIST’s definition is generic. We request clarification of CIP-012 availability.

In the fourth paragraph of the introduction in the Technical Rational, the following sentence needs to be corrected as there is no R2 in CIP-012-1. “CIP-012-1 Requirements R1 and R2 protect the applicable data during transmission between two separate Control Centers.” We believe the text should read R1 and R1.2.