

Project 2020-03 Supply Chain Low Impact Revisions

Summary Response to Standard Authorization Request Comments

Introduction

The Standard Authorization Request (SAR) drafting team thanks all who provided comments during the informal comment period. All comments received were reviewed and the identified common themes are addressed below. Some comments have been reserved for consideration during the standard drafting phase of the project. The SAR drafting team will also consider the language of the most recent supply chain standards in the drafting of this standard. As the standard drafting phase begins, the financial impact question and risk will be considered.

The words “vendor” and “third party” are used interchangeably in the SAR and should be consistent. Based on comments and robust discussion amongst the drafting team, the SAR has been revised (consistent with other CIP standards) to use the term vendor rather than third party.

Terms such as malicious and vendor remote access should be defined.

The need for any new definitions will be discussed and considered during the standard drafting phase.

The SAR could lead to more stringent requirements for Low Impact sites than for other sites and could lead to the possibility of a low impact inventory list being required.

These concerns will be taken into consideration during the standard drafting phase. Reliability standard CIP-005-7 will be closely reviewed, as it is possible that CIP-005-7 R3 (which specifically references vendor remote access) will address part of the concern expressed.

Suggestion to add low impact to the applicability section of all CIP standards.

Modifying the current structure of CIP-003 is outside the scope of the SAR for this team. Comments of this nature will be turned over to the NERC standard efficiency review team to address.

CIP-003-8 Part 1.1 should be updated to address CIP-012, CIP-013, and CIP-014.

Modifying the current structure of CIP-003 is outside the scope of the SAR for this team. Comments of this nature will be turned over to the NERC standard efficiency review team to address.

The proposed standard may result in unfair competitive advantages.

The drafting team does not think the scope in the SAR will lead to development of a standard that poses an unfair competitive advantage for some entities. Furthermore, the scope in the SAR does not preclude any market solutions to achieving compliance with that standard.