

## Comment Report

**Project Name:** 2016-02 Modifications to CIP Standards | CIP-002-6 Draft 2  
**Comment Period Start Date:** 3/16/2018  
**Comment Period End Date:** 4/30/2018  
**Associated Ballots:** 2016-02 Modifications to CIP Standards CIP-002-6 AB 2 ST

There were 52 sets of responses, including comments from approximately 150 different people from approximately 105 companies representing 10 of the Industry Segments as shown in the table on the following pages.

## Questions

**1. Criterion 2.12: Do you agree with the proposed modifications in CIP-002-6 Attachment 1, Criterion 2.12? If not, please provide your rationale and an alternate proposal.**

**2. Effective Date: Do you agree with the proposed modifications in CIP-002-6 to address the implementation timelines for planned and unplanned changes? If not, please provide your rationale and an alternate proposal.**

**3. Implementation Plan: The SDT proposes an Implementation Plan to make the revised standard effective the first day of the first calendar quarter that is three (3) calendar months after the effective date of the applicable governmental authority's order approving the standard, or as otherwise provided for by the applicable governmental authority. Do you agree with this proposal? If you think an alternate, shorter or longer implementation time period is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.**

**4. The SDT believes proposed modifications in CIP-002-6 provide entities with flexibility to meet the reliability objectives 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.**

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
FirstEnergy - FirstEnergy Corporation	Aaron Ghodooshim	3	RF	FirstEnergy Corporation	Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	4	RF
					Aubrey Short	FirstEnergy - FirstEnergy Corporation	1	RF
					Theresa Ciancio	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Ann Ivanc	FirstEnergy - FirstEnergy Solutions	6	RF
Brandon McCormick	Brandon McCormick		FRCC	FMPPA	Tim Beyrle	City of New Smyrna Beach Utilities Commission	4	FRCC
					Jim Howard	Lakeland Electric	5	FRCC
					Lynne Mila	City of Clewiston	4	FRCC
					Javier Cisneros	Fort Pierce Utilities Authority	3	FRCC
					Randy Hahn	Ocala Utility Services	3	FRCC
					Don Cuevas	Beaches Energy Services	1	FRCC
					Jeffrey Partington	Keys Energy Services	4	FRCC
					Tom Reedy	Florida Municipal Power Pool	6	FRCC
					Steven Lancaster	Beaches Energy Services	3	FRCC

					Mike Blough	Kissimmee Utility Authority	5	FRCC
					Chris Adkins	City of Leesburg	3	FRCC
					Ginny Beigel	City of Vero Beach	3	FRCC
Colby Bellville	Colby Bellville		FRCC,RF,SERC	Duke Energy	Doug Hills	Duke Energy	1	RF
					Lee Schuster	Duke Energy	3	FRCC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
Seattle City Light	Ginette Lacasse	1,3,4,5,6	WECC	Seattle City Light Ballot Body	Pawel Krupa	Seattle City Light	1	WECC
					Hao Li	Seattle City Light	4	WECC
					Bud (Charles) Freeman	Seattle City Light	6	WECC
					Mike Haynes	Seattle City Light	5	WECC
					Michael Watkins	Seattle City Light	1,4	WECC
					Faz Kasraie	Seattle City Light	5	WECC
					John Clark	Seattle City Light	6	WECC
					Tuan Tran	Seattle City Light	3	WECC
					Laurie Hammack	Seattle City Light	3	WECC
Entergy	Julie Hall	6		Entergy	Oliver Burke	Entergy - Entergy Services, Inc.	1	SERC
					Jamie Prater	Entergy	5	SERC
Lower Colorado River Authority	Michael Shaw	1		LCRA Compliance	Teresa Cantwell	LCRA	1	Texas RE
					Dixie Wells	LCRA	5	Texas RE
					Michael Shaw	LCRA	6	Texas RE
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Katherine Prewitt	Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company -	3	SERC

						Alabama Power Company		
					William D. Shultz	Southern Company Generation	5	SERC
					Jennifer G. Sykes	Southern Company Generation and Energy Marketing	6	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC no Dominion, NextEra and HQ	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Wayne Sipperly	New York Power Authority	4	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					Edward Bedder	Orange & Rockland Utilities	1	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
					Laura Mcleod	NB Power	1	NPCC
					David Ramkalawan	Ontario Power Generation Inc.	5	NPCC
					Helen Lainis	IESO	2	NPCC
					Michael Schiavone	National Grid	1	NPCC
					Michael Jones	National Grid	3	NPCC

					Michael Forte	Con Ed - Consolidated Edison	1	NPCC
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
					Sean Cavote	PSEG	4	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC
					Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1,5	NPCC
					Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1,5	NPCC
					Salvatore Spagnolo	New York Power Authority	1	NPCC
					Shivaz Chopra	New York Power Authority	6	NPCC
					David Kiguel	Independent	NA - Not Applicable	NPCC
Midwest Reliability Organization	Russel Mountjoy	10		MRO NSRF	Joseph DePoorter	Madison Gas & Electric	3,4,5,6	MRO
					Larry Heckert	Alliant Energy	4	MRO
					Amy Casucelli	Xcel Energy	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jodi Jensen	Western Area Power Administratino	1,6	MRO

					Kayleigh Wilkerson	Lincoln Electric System	1,3,5,6	MRO
					Mahmood Safi	Omaha Public Power District	1,3,5,6	MRO
					Brad Parret	Minnesota Power	1,5	MRO
					Terry Harbour	MidAmerican Energy Company	1,3	MRO
					Tom Breene	Wisconsin Public Service	3,5,6	MRO
					Jeremy Volls	Basin Electric Power Coop	1	MRO
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Mike Morrow	Midcontinent Independent System Operator	2	MRO
Dominion - Dominion Resources, Inc.	Sean Bodkin	6		Dominion	Connie Lowe	Dominion - Dominion Resources, Inc.	3	NA - Not Applicable
					Lou Oberski	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable
					Larry Nash	Dominion - Dominion Virginia Power	1	NA - Not Applicable
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	SPP RE	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	2	SPP RE
					Steve Keller	Soutwest Power Pool Inc	2	SPP RE
					Sean Simpson	Board of Public Utilities, City of Mcpherson, Kansas	NA - Not Applicable	SPP RE
					louis Guidry	Cleco	1,3,5,6	SPP RE
Associated Electric	Todd Bennett	3		AECI	Michael Bax	Central Electric Power	1	SERC

Cooperative,  
Inc.

	Cooperative (Missouri)		
Adam Weber	Central Electric Power Cooperative (Missouri)	3	SERC
Stephen Pogue	M and A Electric Power Cooperative	3	SERC
William Price	M and A Electric Power Cooperative	1	SERC
Jeff Neas	Sho-Me Power Electric Cooperative	3	SERC
Peter Dawson	Sho-Me Power Electric Cooperative	1	SERC
Mark Ramsey	N.W. Electric Power Cooperative, Inc.	1	NPCC
John Stickley	NW Electric Power Cooperative, Inc.	3	SERC
Ted Hilmes	KAMO Electric Cooperative	3	SERC
Walter Kenyon	KAMO Electric Cooperative	1	SERC
Kevin White	Northeast Missouri Electric Power Cooperative	1	SERC
Skyler Wiegmann	Northeast Missouri Electric Power Cooperative	3	SERC
Ryan Ziegler	Associated Electric Cooperative, Inc.	1	SERC
Brian Ackermann	Associated Electric Cooperative, Inc.	6	SERC



					Brad Haralson	Associated Electric Cooperative, Inc.	5	SERC
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**1. Criterion 2.12: Do you agree with the proposed modifications in CIP-002-6 Attachment 1, Criterion 2.12? If not, please provide your rationale and an alternate proposal.**

**Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion**

**Answer** No

**Document Name**

**Comment**

While the SDT recognized oDominion Energy's previous comment, a response has not been provided. As previously asked, "The use of an aggregate weighted value of 6000 contains no justified rationale and appears to be an arbitrary selection. There is no methodology provided that demonstrates how the value is derived."

Likes 0

Dislikes 0

**Response**

**Jeanne Kurzynowski - CMS Energy - Consumers Energy Company - 1,3,4,5 - RF**

**Answer** No

**Document Name**

**Comment**

No. For entities where TO Control Centers already meet High Impact criteria (by way of High Watermark), this clarification only servers to create additional compliance burden to determine an irrelevant criteria.

An alternate proposal to the drafted criterion would precede the Criterion with: "Where TO Control Centers are not determined to meet High Impact criteria then....[perform aggregate weighting evaluation to determine IRC 2.12]", which would allow an entity to avoid the unnecessary compliance burden of performing this evaluation for High Impact TO Control Centers.

Likes 0

Dislikes 0

**Response**

**Stephanie Burns - Stephanie Burns On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Stephanie Burns**

**Answer** No

**Document Name**

**Comment**

ITC believes the criteria should be set at 3000 (to match criterion 2.5). Under the proposed 6000 point criterion entities with a high number of 100KV lines (up to 23) would have control centers excluded from Medium impact criteria and thus would not have to meet most CIP security requirements.

Likes 0

Dislikes 0

### Response

**James Anderson - CMS Energy - Consumers Energy Company - 1**

**Answer**

No

**Document Name**

### Comment

No. For entities where TO Control Centers already meet High Impact criteria (by way of High Watermark), this clarification only serves to create additional compliance burden to determine an irrelevant criteria.

An alternate proposal to the drafted criterion would precede the Criterion with: "Where TO Control Centers are not determined to meet High Impact criteria then.....[perform aggregate weighting evaluation to determine IRC 2.12]", which would allow an entity to avoid the unnecessary compliance burden of performing this evaluation for High Impact TO Control Centers.

Likes 0

Dislikes 0

### Response

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer**

No

**Document Name**

### Comment

No

The proposed modifications could lead to Transmission Owners (TO) performing functional obligations of Transmission Operators that currently have medium impact BES Cyber Systems because of 2.12; to become low impact.

For example:

- The use of the term "and" means that a TO that monitors **but does not control** is no longer classified as a medium BES Cyber Asset.

. A TO that monitors and control a substation (A) that has three 345 kV lines and two 138 kV lines. Its “aggregated weighted value” would be  $1300+1300+1300+250+250=4,400$ . This TO also monitors and controls another substation (B) with one 345 kV lines and one 138 kV lines. Its “aggregated weighted value” would be  $1300+250=1,550$ .  $4,400 (A)+1,550 (B) =5,950$ , which is less than 6,000. Therefore, even though this TO may meet the definition of Control Center, the Control Center’s BES Cyber Systems would now be low impact even though the substation itself would have medium impact BES Cyber Systems (medium impact criteria 2.5).

Texas RE inquires as to whether this is the intent of the SDT.

Likes 0

Dislikes 0

### Response

#### Wendy Center - U.S. Bureau of Reclamation - 5

Answer

No

Document Name

### Comment

Reclamation recommends simplifying the Impact Rating Criteria using the following methodology:

BES Cyber Systems are to be rated as high, medium, or low impact as follows:

- A high impact BES Cyber System is a Control Center that has one or more of the following characteristics:
  - Is identified as supporting an IROL or is necessary to avoid an Adverse Reliability Impact.
  - Supports generation with an aggregate capacity greater than 3000MW;
  - Supports a sum greater than 2500kV of transmission lines above 230kV;
  - Is used to operate transmission lines of 500kV or above;
- A medium impact BES Cyber System has one or more of the following characteristics:
  - Supports a RAS that could negatively affect an IROL or that can perform automatic Load shedding of 300MW or more.
  - Supports a sum between 1500 – 2500kV of transmission lines above 230kV;
  - Supports generation with the aggregate capacity between 1500 – 3000MW;
- A low impact BES Cyber System has one or more of the following characteristics:
  - Supports a sum less than 1500kV of transmission lines above 230kV;
  - Supports transmission only between 110 – 230kV;
  - Supports generation with an aggregate capacity between 75 – 1500MW;
  - Supports any single generator greater than 20MW not already identified as a Medium Impact BES Cyber System;

- Supports any Facilities that are designated a blackstart resource;
- Supports any other RAS not already identified as a medium impact BES Cyber System.

Likes 0

Dislikes 0

**Response**

**Michael Shaw - Lower Colorado River Authority - 1, Group Name** LCRA Compliance

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name** Seattle City Light Ballot Body

**Answer** Yes

**Document Name**

**Comment**

City Light supports APPA comments

Likes 0

Dislikes 0

**Response**

**Darnez Gresham - Darnez Gresham On Behalf of: Annette Johnston, Berkshire Hathaway Energy - MidAmerican Energy Co., 1, 3; - Darnez Gresham**

**Answer** Yes

**Document Name**

**Comment**

One, we agree with establishing a threshold criterion for 2.12. We would like the Standards Drafting Team to provide some background regarding the technical basis for setting the threshold at the 6000 aggregate weighted value for applicable BES Cyber Systems. Two, though we are voting affirmative, we respectfully request the SDT to not ballot CIP-002 again until the Control Center definition has passed. If the Control Center definition is

not resolved by the next ballot on CIP-002, we will consider a negative vote. This is because the Control Center definition is the foundation for the Attachment 1 criteria for Control Centers. Approving a standard without clarity of the foundation term is not advisable.

Likes 0

Dislikes 0

### Response

#### Kevin Salsbury - Berkshire Hathaway - NV Energy - 5

Answer

Yes

Document Name

### Comment

NVE agrees with modification of the criterion. For industry reference, we do believe rationalization for 6000 point threshold should be made available within the Attachment, or through industry outreach (Technical justification document, Industry webinar, etc.)

Likes 0

Dislikes 0

### Response

**Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; Ginny Beigel, City of Vero Beach, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Ken Simmons, Gainesville Regional Utilities, 3, 1, 5; Lynne Mila, City of Clewiston, 4; Mike Blough, Kissimmee Utility Authority, 5, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick, Group Name FMPA**

Answer

Yes

Document Name

### Comment

No comment

Likes 0

Dislikes 0

### Response

#### John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1

Answer

Yes

Document Name

Comment	
No Comment	
Likes	0
Dislikes	0
Response	
Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6	
Answer	Yes
Document Name	
Comment	
<p>We agree with revising this criterion to be a threshold based analysis, and feel it provides a good objective criteria to determine in scope assets. We would like the Standards Drafting Team to provide some background regarding the technical basis for setting the threshold at the 6000 aggregate weighted value for applicable BES Cyber Systems.</p> <p>Also, we'd like the Standards Drafting Team to consider timing when posting CIP-002-6 for final ballot. Without the Control Center definition being resolved and approved prior to the final approval for CIP-002-6, we will consider a negative vote on CIP-002-6. This is because the Control Center definition is the foundation for the Attachment 1 criteria for Control Centers, and would not be advisable to approve the standard without clarity of the term.</p>	
Likes	0
Dislikes	0
Response	
Terry Harbour - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1	
Answer	Yes
Document Name	
Comment	
<p>One, we agree with establishing a threshold criterion for 2.12. We would like the Standards Drafting Team to provide some background regarding the technical basis for setting the threshold at the 6000 aggregate weighted value for applicable BES Cyber Systems. Two, though we are voting affirmative, we respectfully request the SDT to not ballot CIP-002 again until the Control Center definition has passed. If the Control Center definition is not resolved by the next ballot on CIP-002, we will consider a negative vote. This is because the Control Center definition is the foundation for the Attachment 1 criteria for Control Centers. Approving a standard without clarity of the foundation term is not advisable.</p>	
Likes	0

Dislikes 0

**Response**

**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name** Southern Company

**Answer** Yes

**Document Name**

**Comment**

Yes, without additional comment.

Likes 0

Dislikes 0

**Response**

**Russell Martin II - Salt River Project - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

Proposed modifications are accepted. No impact on existing categorization of SRP BES Cyber Systems at control centers. SRP control center(s) are categorized "High Impact" due to Criterion 1.1-1.4, hence Criterion 2.12 is not applicable

Likes 0

Dislikes 0

**Response**

**Linda Jacobson-Quinn - City of Farmington - 3**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**



**Val Ridad - Silicon Valley Power - City of Santa Clara - 3**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Jeff Ipsaro - Silicon Valley Power - City of Santa Clara - 4**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Kristine Ward - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Nicholas Lauriat - Network and Security Technologies - 1**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

**Response**

**Leonard Kula - Independent Electricity System Operator - 2**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Aaron Austin - AEP - 3**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Sandra Pacheco - Silicon Valley Power - City of Santa Clara - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Russel Mountjoy - Midwest Reliability Organization - 10, Group Name MRO NSRF**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jonathan Aragon - APS - Arizona Public Service Co. - 6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jeff Johnson - Jeff Johnson On Behalf of: Martine Blair, Sempra - San Diego Gas and Electric, 3, 5, 1; - Jeff Johnson**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Faz Kasraie - Seattle City Light - 5 - WECC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Glen Farmer - Avista - Avista Corporation - 1,3,5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5 - WECC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Colby Bellville - Colby Bellville On Behalf of: Greg Cecil, Duke Energy , 6, 5, 3, 1; - Colby Bellville, Group Name Duke Energy**

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Douglas Johnson - American Transmission Company, LLC - 1</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>David Gordon - Massachusetts Municipal Wholesale Electric Company - 5</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Aaron Ghodooshim - FirstEnergy - FirstEnergy Corporation - 3, Group Name FirstEnergy Corporation</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

**Response**

**Brian Evans-Mongeon - Utility Services, Inc. - 4**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Chris Scanlon - Exelon - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Julie Hall - Entergy - 6, Group Name Entergy**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP RE**

**Answer**

Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Andrey Komissarov - Sempra - San Diego Gas and Electric - 7 - WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Nicolas Turcotte - Hydro-Quebec TransEnergie - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

**Response**

**Dmitriy Bazilyuk - NiSource - Northern Indiana Public Service Co. - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**David Ramkalawan - Ontario Power Generation Inc. - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Teresa Cantwell - Lower Colorado River Authority - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Heather Morgan - EDP Renewables North America LLC - 5**

**Answer** Yes

**Document Name**



**Comment**

Likes 0

Dislikes 0

**Response****Jack Cashin - American Public Power Association - 4****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, NextEra and HQ****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Patricia Lynch - NRG - NRG Energy, Inc. - 5,6****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response**

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI**

**Answer**

**Document Name**

**Comment**

AECI supports comments provided by NRECA

Likes 0

Dislikes 0

**Response**

**Eli Rivera - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE**

**Answer**

**Document Name**

**Comment**

No Response

Likes 0

Dislikes 0

**Response**

**2. Effective Date: Do you agree with the proposed modifications in CIP-002-6 to address the implementation timelines for planned and unplanned changes? If not, please provide your rationale and an alternate proposal.**

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, NextEra and HQ**

**Answer** No

**Document Name**

**Comment**

Update says

<<

For requirements that contain periodic obligations, initial performance of those obligations following an Unplanned Change shall occur within the first period following the date that the Implementation Period ends, as defined in the table above

>>

Request clarification on this "first period." If the obligation is quarterly and the Implementation Period is 24 months, would this first period be the first quarter after those 24 months?

Request clarification on "CIP Cyber Security Standards." Does this include only CIP-002 – CIP-011? Or more CIP Standards?

<<

This general process of categorization of BES Cyber Systems based on impact on the reliable operation of the BES is consistent with risk management approaches for the purpose of application of cyber security requirements in the remainder of the Version 5 CIP Cyber Security Standards.

>>

It might be pertinent that the STD takes in consideration the change in the categorization for an existing BES cyber System considered in CIP-002-6 as an unplanned changes and gives an implementation period to comply with the new applicable requirements relative to the new categorisation. A change in the categorization for an existing BES cyber System can be from Low to Medium and can involve an certain amount of new applicable requirements that can involve for an entity a certain period of time to be compliant even tough the BES Cyber system is already impacting the BES.

Likes 0

Dislikes 0

**Response**

**Heather Morgan - EDP Renewables North America LLC - 5**

**Answer** No

**Document Name**

**Comment**

“Initial performance of those obligations following a Planned Change shall occur within the first period following the commissioned date of the Planned Change.” Further clarification is needed regarding what the “first period” means. For instance, does this mean calendar quarter? Next day? Day of?

Additionally, further clarification is needed on what “impacting the BES” means with respect to, “the commissioned date is the date a new or modified Bulk Electric System asset or Cyber Asset is capable of impacting the BES.” Does this mean that, according to the entity’s interpretation, the new or modified BES asset or Cyber Asset could, *within 15 minutes*, adversely impact the reliable operation of the BES? Or does impacting the BES mean something else ?

Likes 0

Dislikes 0

**Response**

**Eli Rivera - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE**

**Answer**

No

**Document Name**

**Comment**

CenterPoint Energy Houston Electric, LLC (“CenterPoint Energy”) agrees with moving the implementation timelines for planned and unplanned changes to CIP-002-6. However, CenterPoint Energy believes the implementation timeline for planned changes resulting in a higher categorization as proposed in CIP-002-6 is not consistent with the concept in the current CIP Version 5/6 implementation plan. Paragraph 3 on page 4 of the “Implementation Plan for Version 5 CIP Cyber Security Standards” states that for planned changes resulting in a higher categorization, the responsible entity shall comply with all applicable requirements “**on the update of the identification and categorization of the affected BES Cyber System,**” not “upon the commission date of the planned change” as proposed in CIP-002-6.

CenterPoint Energy recommends removing the phrase “or a change in categorization for an existing BES Cyber System” from the second paragraph in section 6 to keep it focused on planned changes resulting in a new BES Cyber System and adding the following paragraph for planned changes resulting in a higher categorization:

“For planned changes resulting in a higher categorization, the responsible entity shall comply with all applicable requirements in the CIP Cyber Security Standards on the update of the identification and categorization of the affected BES Cyber System and any applicable and associated Physical Access Control Systems, Electronic Access Control and Monitoring Systems and Protected Cyber Assets.”

Likes 0

Dislikes 0

**Response**

**Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC**

**Answer**

No

**Document Name**

**Comment**

Tri-State does not understand the sentence/paragraph following the Implementation Table in Section 6. For example, there's a reference to requirements with periodic obligations. Does this pertain only to those found in CIP-002 or those found throughout the CIP Standards? If it only refers to those found in CIP-002, then Tri-State would recommend explicitly stating that. Tri-State also believes the language is overly verbose and complex.

Likes 0

Dislikes 0

**Response****James Anderson - CMS Energy - Consumers Energy Company - 1**

**Answer**

No

**Document Name**

**Comment**

Since CIP-002-5.1a became effective the SMEs responsible for evaluating and identifying Low BES Cyber Assets have incrementally increased the types of devices in scope as industry/regional expectations developed, SME changes and associated interpretations occurred, and their own CIP-002-5.1a knowledge has increased.

Adding regulation to be compliant upon installation will have the opposite effect of SMEs: who will now prefer “no change” over performing a thorough and fresh review for each CIP-002 iteration.

Likes 0

Dislikes 0

**Response****Julie Hall - Entergy - 6, Group Name Entergy**

**Answer**

No

**Document Name**

**Comment**

The proposed Section 6 for Planned and Unplanned Changes is good. The issue is that the definitions, examples, and timeframes do not specifically address the timeframes for acquisition of an existing facility and differences between company posture. Recommend defining acquisitions as either a Planned Change, Unplanned Change, or as a separate event with timeframes.

Likes 0

Dislikes 0

**Response**

**Michael Shaw - Lower Colorado River Authority - 1, Group Name LCRA Compliance**

**Answer** No

**Document Name**

**Comment**

Want to see Commission date defined in the NERC Glossary of terms. Would like to see "Commission date" language to be used in the CIP-007 and CIP-010 standards that it impacts ( baselining, SIEM logging, Patch Source tracking) and the language in those standards changed concurrently with the CIP-002-6. Section 6 of CIP-002-6 uses the word "this Reliability Standard" in the first sentence which implies CIP-002-6 only but the standard is impacting not just "this CIP-002" but affects other standards as well.

Likes 0

Dislikes 0

**Response**

**David Gordon - Massachusetts Municipal Wholesale Electric Company - 5**

**Answer** No

**Document Name**

**Comment**

MMWEC supports comments submitted by NPCC.

Likes 0

Dislikes 0

**Response**

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** No

**Document Name**

**Comment**

BPA disagrees with the location/treatment of the implementation timelines (i.e. Applicability section) for description of Planned and Unplanned Changes and associated Scenario of Unplanned Changed Implementation Period table. From an audit standpoint, BPA suggests standard template formatting and numbering be applied.

Likes 0

Dislikes 0

**Response**

**Jeanne Kurzynowski - CMS Energy - Consumers Energy Company - 1,3,4,5 - RF**

**Answer** No

**Document Name**

**Comment**

Since CIP-002-5.1a became effective the SMEs responsible for evaluating and identifying Low BES Cyber Assets have incrementally increased the types of devices in scope as industry/regional expectations developed, SME changes and associated interpretations occurred, and their own CIP-002-5.1a knowledge has increased.

Adding regulation to be compliant upon installation will have the opposite effect of SMEs: who will now prefer “no change” over performing a thorough and fresh review for each CIP-002 iteration.

Likes 0

Dislikes 0

**Response**

**Jonathan Aragon - APS - Arizona Public Service Co. - 6**

**Answer** No

**Document Name**

**Comment**

AZPS recommends that the implementation time period be 24 calendar months from the date of notification or detection of the unplanned changes regardless of whether or not the Entity has previously identified a low, medium, or high impact BES Cyber System associated with that same BES asset type as the effort required would involve the design and implementation of technology, procurement, and contracting efforts, which could easily exceed 12 months.

Likes 0

Dislikes 0

**Response**

**Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion**

**Answer** No

**Document Name**

**Comment**

1. Dominion Energy recommends converting the footnotes contained in Section 6 to NERC defined terms. This would clarify the terms in a central location and avoid confusion.

2. It is unclear why an unplanned change would warrant more time than a planned change. The risk is the same for both situations. Please provide clarification on why unplanned and planned changes have different implementation periods.
3. In some scenarios, it appears that a change may result in reclassifying a BCS which would require significant changes to meet compliance obligations.

Clarify why an entity may have a 12 month implementation plan in the case of an unplanned change, but could potentially only have a few weeks implementation plan for the entire substation if a new transmission line causes the substation to go from low to medium impact. The “few weeks” example was provided because cyber assets will likely be the last phase of a project and the substation BCS will not be complete without the new cyber assets. Additionally, all compliance related tasks would need to be completed during the same timeframe as operational installation and testing.

For planned changes, we recommend defining an implementation period not to exceed 1 year after the in-service date that allows for compliance activities to be performed.

Likes 0

Dislikes 0

**Response**

**Russell Martin II - Salt River Project - 1,3,5,6 - WECC**

**Answer**

Yes

**Document Name**

**Comment**

If these standards would have applied to us, SRP would have discussed the timeline and impacts as a group and formed a consensus before commenting. We would have asked for additional time to prepare to meet compliance (for planning, coordination, and out other logistics).

Likes 0

Dislikes 0

**Response**

**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company**

**Answer**

Yes

**Document Name**

**Comment**

Yes, without additional comment.

Likes 0

Dislikes 0



<b>Response</b>	
<b>Terry Harbour - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Though we are voting affirmative, we respectfully request the SDT consider a revision. Planned and unplanned changes include footnotes. We recommend revising both footnotes from "Examples of ... include:" to "Examples of ... include, but are not limited to:"	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
We support the proposed implementation timelines for planned and unplanned changes. However, please consider the following revision to planned and unplanned changes footnotes. We recommend revising both footnotes from "Examples of ... include:" to "Examples of ... include, but are not limited to:"	
Likes	0
Dislikes	0
<b>Response</b>	
<b>John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
No Comment	
Likes	0
Dislikes	0

Response	
<b>Teresa Cantwell - Lower Colorado River Authority - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
Comment	
<p>Yes with the following questions to be addressed:</p> <p>1.Does a new EMS need to be CIP compliant before the first cut-over test?</p> <p>2.Assuming the cut-over test in Q1 fails, does the system need to remain CIP compliant until the next test? The time between cut-over tests may be months.</p>	
Likes	0
Dislikes	0

Response	
<b>Nicolas Turcotte - Hydro-Quebec TransEnergie - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
Comment	
<p>It might be pertinent that the STD takes in consideration the change in the categorization for an existing BES cyber System considered in CIP-002-6 as an unplanned changes and gives an implementation period to comply with the new applicable requirements relative to the new categorisation. A change in the categorization for an existing BES cyber System can be from Low to Medium and can involve an certain amount of new applicable requirements that can involve for an entity a certain period of time to be compliant even tough the BES Cyber system is already impacting the BES.</p>	
Likes	0
Dislikes	0

Response	
<p><b>Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; Ginny Beigel, City of Vero Beach, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Ken Simmons, Gainesville Regional Utilities, 3, 1, 5; Lynne Mila, City of Clewiston, 4; Mike Blough, Kissimmee Utility Authority, 5, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick, Group Name FMPA</b></p>	
<b>Answer</b>	Yes
<b>Document Name</b>	

**Comment**

No comment

Likes 0

Dislikes 0

**Response**

**Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP RE**

**Answer** Yes

**Document Name**

**Comment**

Xcel Energy generally agrees with the proposed timelines for implementation of planned and unplanned changes, further clarifications of what constitutes an unplanned change would be appreciated. The concern involves the potential maintenance or replacement of BES Assets in a BES System. As an example, would the replacement of a failed relay at a Medium Impact substation allow for a 12 month implementation period and remove compliance obligations for that system in that period? In order to remediate any ambiguous language in Section 6, Xcel Energy suggests changing the "Unplanned" language to read:

*For Unplanned Changes, resulting in a new BES Cyber System or a change in categorization for an existing BES Cyber System, the Responsible Entity shall comply with all newly applicable requirements in this Reliability Standard according to the timelines in the table below....*

Likes 0

Dislikes 0

**Response**

**Kevin Salsbury - Berkshire Hathaway - NV Energy - 5**

**Answer** Yes

**Document Name**

**Comment**

NVE believed the timelines determined for planned and unplanned changes are reasonable.

Likes 0

Dislikes 0

**Response**

**Chris Scanlon - Exelon - 1**

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Exelon notices that the Unplanned Changes as described in the footnote, are all externally initiated changes. Are there any internally initiated changes that could also qualify as unplanned? Also, there may be unplanned changes that involve decommissioning of an asset. Should this also be expounded on here?	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Darnez Gresham - Darnez Gresham On Behalf of: Annette Johnston, Berkshire Hathaway Energy - MidAmerican Energy Co., 1, 3; - Darnez Gresham</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Though we are voting affirmative, we respectfully request the SDT consider a revision. Planned and unplanned changes include footnotes. We recommend revising both footnotes from "Examples of ... include:" to "Examples of ... include, but are not limited to:"	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name Seattle City Light Ballot Body</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
City Light supports APPA comments	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group</b>	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Patricia Lynch - NRG - NRG Energy, Inc. - 5,6</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Wendy Center - U.S. Bureau of Reclamation - 5</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Jack Cashin - American Public Power Association - 4</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

**Response**

**David Ramkalawan - Ontario Power Generation Inc. - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Dmitriy Bazylyuk - NiSource - Northern Indiana Public Service Co. - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Andrey Komissarov - Sempra - San Diego Gas and Electric - 7 - WECC**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Brian Evans-Mongeon - Utility Services, Inc. - 4**

**Answer**

Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Stephanie Burns - Stephanie Burns On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Stephanie Burns</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Aaron Ghodooshim - FirstEnergy - FirstEnergy Corporation - 3, Group Name FirstEnergy Corporation</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Douglas Johnson - American Transmission Company, LLC - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	

Dislikes 0

**Response**

**Colby Bellville - Colby Bellville On Behalf of: Greg Cecil, Duke Energy , 6, 5, 3, 1; - Colby Bellville, Group Name Duke Energy**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5 - WECC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Glen Farmer - Avista - Avista Corporation - 1,3,5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Faz Kasraie - Seattle City Light - 5 - WECC**

**Answer** Yes



<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Jeff Johnson - Jeff Johnson On Behalf of: Martine Blair, Sempra - San Diego Gas and Electric, 3, 5, 1; - Jeff Johnson</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Russel Mountjoy - Midwest Reliability Organization - 10, Group Name MRO NSRF</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Sandra Pacheco - Silicon Valley Power - City of Santa Clara - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

**Response**

**Aaron Austin - AEP - 3**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Leonard Kula - Independent Electricity System Operator - 2**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Nicholas Lauriat - Network and Security Technologies - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Kristine Ward - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response****Jeff Ipsaro - Silicon Valley Power - City of Santa Clara - 4****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Val Ridad - Silicon Valley Power - City of Santa Clara - 3****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Linda Jacobson-Quinn - City of Farmington - 3****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response**

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer**

**Document Name**

**Comment**

Texas RE inquires as to why the section regarding planned and unplanned changes was removed from the implementation plan. Since they no longer reside in one of the enforceable parts of the standard, this will cause confusion upon implementation. Texas RE recommends keeping this section in the implementation plan.

Texas RE also noticed that PCAs were removed from the graphic on page 7, but is still in the list of Cyber Assets on page 9.

Likes 0

Dislikes 0

**Response**

**Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI**

**Answer**

**Document Name**

**Comment**

AECI supports comments provided by NRECA

Likes 0

Dislikes 0

**Response**

**3. Implementation Plan: The SDT proposes an Implementation Plan to make the revised standard effective the first day of the first calendar quarter that is three (3) calendar months after the effective date of the applicable governmental authority's order approving the standard, or as otherwise provided for by the applicable governmental authority. Do you agree with this proposal? If you think an alternate, shorter or longer implementation time period is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.**

**Jeanne Kurzynowski - CMS Energy - Consumers Energy Company - 1,3,4,5 - RF**

**Answer** No

**Document Name**

**Comment**

Without industry concurrence on the standard revisions, it is premature to comment on the implementation plan.

Likes 0

Dislikes 0

**Response**

**Colby Bellville - Colby Bellville On Behalf of: Greg Cecil, Duke Energy , 6, 5, 3, 1; - Colby Bellville, Group Name Duke Energy**

**Answer** No

**Document Name**

**Comment**

Duke Energy suggests the drafting team consider an Implementation Plan of 6 calendar months. Additional time will be necessary to identify impacted areas, and then to make necessary changes to applicable documentation. We think that 6 calendar months is a more reasonable timeframe given the potential level of work.

Likes 0

Dislikes 0

**Response**

**Michael Shaw - Lower Colorado River Authority - 1, Group Name LCRA Compliance**

**Answer** No

**Document Name**

**Comment**

Since the proposed changes impact other standards, we will need to rework the current processes and have adequate time for testing the new processes. Need the effective day to be at least first day of the first calendar quarter that is twelve (12) calendar months after approval.

Likes 0

Dislikes 0

**Response**

**James Anderson - CMS Energy - Consumers Energy Company - 1**

**Answer**

No

**Document Name**

**Comment**

Without industry concurrence on the standard revisions, it is premature to comment on the implementation plan.

Likes 0

Dislikes 0

**Response**

**Dmitriy Bazylyuk - NiSource - Northern Indiana Public Service Co. - 5**

**Answer**

No

**Document Name**

**Comment**

The changes would likely take more time than 3 months to implement. 12 calendar months would be reasonable to make sure the processes and documentation are ready.

Likes 0

Dislikes 0

**Response**

**Wendy Center - U.S. Bureau of Reclamation - 5**

**Answer**

No

**Document Name**

**Comment**

Reclamation recommends the Implementation Plan for the revised standard become effective the first day of the first calendar quarter that is 18 calendar months after the effective date of the applicable governmental authority's order approving the standard to allow entities time to apply the revised Impact Rating Criteria.

Likes 0

Dislikes 0

### Response

**Jonathan Aragon - APS - Arizona Public Service Co. - 6**

**Answer**

Yes

**Document Name**

**Comment**

AZPS proposed that the first sentence following the table in Section 6 be modified to state: "With the exception of the initial implementation of CIP-002-6 as set forth in "Implementation Plan", for requirements that contain periodic obligation, initial performance of those obligations following an Unplanned Change, etc.

Likes 0

Dislikes 0

### Response

**Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name Seattle City Light Ballot Body**

**Answer**

Yes

**Document Name**

**Comment**

City Light supports APPA comments

Likes 0

Dislikes 0

### Response

**Darnez Gresham - Darnez Gresham On Behalf of: Annette Johnston, Berkshire Hathaway Energy - MidAmerican Energy Co., 1, 3; - Darnez Gresham**

**Answer**

Yes

**Document Name**

Comment	
<p>1. The SDT believes proposed modifications in CIP-002-6 provide entities with flexibility to meet the reliability objectives 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.</p>	
Likes	0
Dislikes	0
Response	
<p><b>Brian Evans-Mongeon - Utility Services, Inc. - 4</b></p>	
Answer	Yes
Document Name	
Comment	
<p>Section 6 Planned and Unplanned changes uses the term commission date and then defines it in the next sentence. Suggest removing the term "commision date" and replacing it with "the date a new or modified Bulk Electric System asset or Cyber Asset is capable of impacting the BES". It is confusing to use a term in only one place and then applying a definition that is different than what some people may be use to.</p>	
Likes	0
Dislikes	0
Response	
<p><b>Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; Ginny Beigel, City of Vero Beach, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Ken Simmons, Gainesville Regional Utilities, 3, 1, 5; Lynne Mila, City of Clewiston, 4; Mike Blough, Kissimmee Utility Authority, 5, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick, Group Name FMPA</b></p>	
Answer	Yes
Document Name	
Comment	
<p>No comment</p>	
Likes	0
Dislikes	0
Response	



**John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1**

**Answer** Yes

**Document Name**

**Comment**

Tacoma Power supports comments provided by APPA.

Likes 0

Dislikes 0

**Response**

**Jack Cashin - American Public Power Association - 4**

**Answer** Yes

**Document Name**

**Comment**

APPA supports the proposed Implementation Plan and offer input to improve the clarity of that plan. Section 6 addressing Planned and Unplanned changes uses the term commission date and then defines it in the next sentence. Public power recommends removing the term "commision date" and replacing it with "the date a new or modified Bulk Electric System asset or Cyber Asset is capable of impacting the BES." This change will provide sufficient clarity in implementing the Standard.

Likes 0

Dislikes 0

**Response**

**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company**

**Answer** Yes

**Document Name**

**Comment**

Given that the standard is directed toward moving the scope of applicability down (medium to low), Southern agrees with the proposal.

Likes 0

Dislikes 0

**Response**

**Russell Martin II - Salt River Project - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

SRP agrees

Likes 0

Dislikes 0

**Response**

**Linda Jacobson-Quinn - City of Farmington - 3**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Val Ridad - Silicon Valley Power - City of Santa Clara - 3**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jeff Ipsaro - Silicon Valley Power - City of Santa Clara - 4**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response****Kristine Ward - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Nicholas Lauriat - Network and Security Technologies - 1****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Leonard Kula - Independent Electricity System Operator - 2****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response**

**Aaron Austin - AEP - 3**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Sandra Pacheco - Silicon Valley Power - City of Santa Clara - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Russel Mountjoy - Midwest Reliability Organization - 10, Group Name MRO NSRF**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jeff Johnson - Jeff Johnson On Behalf of: Martine Blair, Sempra - San Diego Gas and Electric, 3, 5, 1; - Jeff Johnson**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Faz Kasraie - Seattle City Light - 5 - WECC**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Glen Farmer - Avista - Avista Corporation - 1,3,5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

Answer	Yes
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Document Name	
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Comment	
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Likes	0
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Dislikes	0
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Response	
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**Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5 - WECC**

Answer	Yes
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Document Name	
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Comment	
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Likes	0
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Dislikes	0
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Response	
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**Douglas Johnson - American Transmission Company, LLC - 1**

Answer	Yes
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Document Name	
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Comment	
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Likes	0
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Dislikes	0
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Response	
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**David Gordon - Massachusetts Municipal Wholesale Electric Company - 5**

Answer	Yes
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Document Name	
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Comment	
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Likes 0

Dislikes 0

**Response**

**Aaron Ghodooshim - FirstEnergy - FirstEnergy Corporation - 3, Group Name** FirstEnergy Corporation

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Chris Scanlon - Exelon - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Julie Hall - Entergy - 6, Group Name** Entergy

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Kevin Salsbury - Berkshire Hathaway - NV Energy - 5**

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP RE</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Andrey Komissarov - Sempra - San Diego Gas and Electric - 7 - WECC</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	



Dislikes 0

**Response**

**Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Eli Rivera - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**David Ramkalawan - Ontario Power Generation Inc. - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Teresa Cantwell - Lower Colorado River Authority - 5**

**Answer**

Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Heather Morgan - EDP Renewables North America LLC - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Terry Harbour - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

**Response**

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, NextEra and HQ**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Patricia Lynch - NRG - NRG Energy, Inc. - 5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECl**

**Answer**

**Document Name**

**Comment**

AECI supports comments provided by NRECA

Likes 0

Dislikes 0

**Response**

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer**

**Document Name**

**Comment**

Texas RE is not opposed to the timeline set forth in the implementation plan. Please see Texas RE's comment in #2 regarding planned and unplanned changes.

Likes 0

Dislikes 0

**Response**

4. The SDT believes proposed modifications in CIP-002-6 provide entities with flexibility to meet the reliability objectives 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.

**Wendy Center - U.S. Bureau of Reclamation - 5**

**Answer** No

**Document Name**

**Comment**

Reclamation recommends the simplified Impact Rating Criteria described in the response to Question 1 will provide a more cost-effective manner of categorizing BES Cyber Systems and their associated BES Cyber Assets by reducing the cost of implementing the standard and the overall impact of CIP-002-6 and allowing entities to reduce the time spent “review[ing] the identifications in Requirement R1 and its parts (and update[ing] them if there are changes identified) at least once every 15 calendar months.”

Likes 0

Dislikes 0

**Response**

**James Anderson - CMS Energy - Consumers Energy Company - 1**

**Answer** No

**Document Name**

**Comment**

For entities where TO Control Centers already meet High Impact criteria (by way of High Watermark), this clarification only servers to create additional compliance burden to determine an irrelevant criteria.

An alternate proposal to the drafted criterion would precede the Criterion with: “Where TO Control Centers are not determined to meet High Impact criteria then.....[perform aggregate weighting evaluation to determine IRC 2.12]”, which would allow an entity to avoid the unnecessary compliance burden of performing this evaluation for High Impact TO Control Centers.

Likes 0

Dislikes 0

**Response**

**Michael Shaw - Lower Colorado River Authority - 1, Group Name LCRA Compliance**

**Answer** No

**Document Name**

**Comment**

Would have like to see a timeframe like 14 calendar days within the “Commission Date” to comply rather than the “Commission Date”.

Likes 0

Dislikes 0

**Response****Jeanne Kurzynowski - CMS Energy - Consumers Energy Company - 1,3,4,5 - RF**

**Answer**

No

**Document Name**

**Comment**

For entities where TO Control Centers already meet High Impact criteria (by way of High Watermark), this clarification only servers to create additional compliance burden to determine an irrelevant criteria.

An alternate proposal to the drafted criterion would precede the Criterion with: “Where TO Control Centers are not determined to meet High Impact criteria then....[perform aggregate weighting evaluation to determine IRC 2.12]”, which would allow an entity to avoid the unnecessary compliance burden of performing this evaluation for High Impact TO Control Centers.

Likes 0

Dislikes 0

**Response****Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion**

**Answer**

No

**Document Name**

**Comment**

Dominion Energy is unable to respond because we are not impacted by the change for 2.12.

Likes 0

Dislikes 0

**Response****Russell Martin II - Salt River Project - 1,3,5,6 - WECC**

**Answer**

Yes

**Document Name****Comment**

This question might be applicable to entities who are expected to have planned and unplanned facilities non-compliant with CIP-002-6. Flexibility is, having the time and human resources to form compliance with CIP-002-6 before the deadlines. SRP does not expect such changes in our footprint. SRP agrees with the proposed modifications in CIP-002-6.

Likes 0

Dislikes 0

**Response**

**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name** Southern Company

**Answer**

Yes

**Document Name****Comment**

Given that the standard is directed toward moving the scope of applicability down (medium to low), Southern agrees with the proposal.

Likes 0

Dislikes 0

**Response**

**Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; Ginny Beigel, City of Vero Beach, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Ken Simmons, Gainesville Regional Utilities, 3, 1, 5; Lynne Mila, City of Clewiston, 4; Mike Blough, Kissimmee Utility Authority, 5, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick, Group Name** FMPA

**Answer**

Yes

**Document Name****Comment**

No comment

Likes 0

Dislikes 0

**Response**

**Jonathan Aragon - APS - Arizona Public Service Co. - 6**

**Answer** Yes

**Document Name**

**Comment**

AZPS agrees that the proposed modifications provide entities with flexibility to meet the reliability objectives, provided the implementation period is reasonable (i.e., 24 months). Otherwise it may require entities to expend significant resources to meet timeframes that may be unnecessarily short.

Likes 0

Dislikes 0

**Response**

**Kristine Ward - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC**

**Answer** Yes

**Document Name**

**Comment**

**ADDITIONAL COMMENTS**

1. Would a modification to an entity's procedure for categorizing BES Cyber Systems that brought in additional or medium or low impact BCAs be a "planned change" for purposes of CIP-002?
2. It is Seminole's understanding that NERC is attempting to disconnect the Guidelines and Technical Basis from being connected to the Standard as this section is not part of the Standard. The drafting team should make the Guidelines and Technical Basis a separate document.
3. Are the Appendix Interpretations part of the Standard? Are they being approved by FERC via this ballot action? If not, then they should be separated from the Standard.
4. How are interpretations attached to Standards different than the Compliance Application Notices ("CANS") that NERC used to attach but they tried to get away from attaching?

Likes 0

Dislikes 0

**Response**

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group**

**Answer** Yes

**Document Name**



**Comment**

Likes 0

Dislikes 0

**Response**

**Patricia Lynch - NRG - NRG Energy, Inc. - 5,6**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, NextEra and HQ**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Terry Harbour - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Heather Morgan - EDP Renewables North America LLC - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Teresa Cantwell - Lower Colorado River Authority - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**David Ramkalawan - Ontario Power Generation Inc. - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Dmitriy Bazylyuk - NiSource - Northern Indiana Public Service Co. - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Nicolas Turcotte - Hydro-Quebec TransEnergie - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Andrey Komissarov - Sempra - San Diego Gas and Electric - 7 - WECC**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP RE**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Kevin Salsbury - Berkshire Hathaway - NV Energy - 5**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Julie Hall - Entergy - 6, Group Name Entergy**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

**Response**

**Chris Scanlon - Exelon - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Aaron Ghodooshim - FirstEnergy - FirstEnergy Corporation - 3, Group Name FirstEnergy Corporation**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Darnez Gresham - Darnez Gresham On Behalf of: Annette Johnston, Berkshire Hathaway Energy - MidAmerican Energy Co., 1, 3; - Darnez Gresham**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Douglas Johnson - American Transmission Company, LLC - 1**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5 - WECC**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Glen Farmer - Avista - Avista Corporation - 1,3,5**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Faz Kasraie - Seattle City Light - 5 - WECC**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

**Response**

**Jeff Johnson - Jeff Johnson On Behalf of: Martine Blair, Sempra - San Diego Gas and Electric, 3, 5, 1; - Jeff Johnson**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Russel Mountjoy - Midwest Reliability Organization - 10, Group Name MRO NSRF**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Sandra Pacheco - Silicon Valley Power - City of Santa Clara - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Leonard Kula - Independent Electricity System Operator - 2**

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Nicholas Lauriat - Network and Security Technologies - 1</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Jeff Ipsaro - Silicon Valley Power - City of Santa Clara - 4</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Val Ridad - Silicon Valley Power - City of Santa Clara - 3</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	



Dislikes 0

**Response**

**Linda Jacobson-Quinn - City of Farmington - 3**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer**

**Document Name**

**Comment**

Texas RE does not have comments on this question.

Likes 0

Dislikes 0

**Response**

**John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1**

**Answer**

**Document Name**

**Comment**

No Comment

Likes 0

Dislikes 0

**Response**

**Eli Rivera - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE**

**Answer**

**Document Name**

**Comment**

No Response

Likes 0

Dislikes 0

**Response**

**Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI**

**Answer**

**Document Name**

**Comment**

AECI supports comments provided by NRECA

Likes 0

Dislikes 0

**Response**

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer**

**Document Name**

**Comment**

BPA has no comment

Likes 0

Dislikes 0

**Response**

**Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name Seattle City Light Ballot Body**

**Answer**

<b>Document Name</b>	
<b>Comment</b>	
City Light supports APPA comments	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Aaron Austin - AEP - 3</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
No comment	
Likes 0	
Dislikes 0	
<b>Response</b>	