

## Comment Report

**Project Name:** 2016-02 Modifications to CIP Standards | IROL Modifications to CIP-002 SAR  
Comment Period Start Date: 6/14/2018  
Comment Period End Date: 7/13/2018  
Associated Ballots:

There were 24 sets of responses, including comments from approximately 128 different people from approximately 88 companies representing 10 of the Industry Segments as shown in the table on the following pages.

## Questions

1. Do you agree with the scope and objectives of this SAR? If not, please explain why you do not agree, and, if possible, provide specific language revisions that would make it acceptable to you.
2. Are you aware of any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standards? If yes, please identify the jurisdiction and specific regulatory requirements.
3. Are there any other concerns with this SAR that haven't been covered in previous questions?

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	1,3,4	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
Florida Municipal Power Agency	Brandon McCormick	3,4,5,6	FRCC	FMPA	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
Duke Energy	Colby Bellville	1,3,5,6	FRCC,RF,SERC	Duke Energy	Doug Hils	Duke Energy	1	RF
					Lee Schuster	Duke Energy	3	FRCC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
MRO	Dana Klem	1,2,3,4,5,6	MRO	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 Administration	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 Corporation	3,5,6	MRO
					Jeremy Voll	Basin Electric Power Cooperative	1	MRO
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Mike Morrow	Midcontinent ISO	2	MRO
Seattle City Light	Ginette Lacasse	1,3,4,5,6	WECC		Pawel Krupa	Seattle City Light	1	WECC

				Seattle City Light Ballot Body	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
					Laurrie Hammack	Seattle City Light	3	WECC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC no Dominion	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
Quintin Lee	Eversource Energy	1	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
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC
Caroline Dupuis	Hydro Quebec	1	NPCC
Chantal Mazza	Hydro Quebec	2	NPCC
Gregory Campoli	New York Independent	2	NPCC

						System Operator		
					Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
PSEG	Sean Cavote	1,3,5,6	NPCC,RF	PSEG REs	Tim Kucey	PSEG - PSEG Fossil LLC	5	NPCC
					Karla Barton	PSEG - PSEG Energy Resources and Trade LLC	6	RF
					Jeffrey Mueller	PSEG - Public Service Electric and Gas Co.	3	RF
					Joseph Smith	PSEG - Public Service Electric and Gas Co.	1	RF
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	MRO,SPP RE	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	2	MRO
					Jim Williams	Southwest Power Pool Inc	2	MRO
					John Allen	City Utilities of Springfield, Missouri	4	MRO
					Louis Guidry	Cleco	1,3,5,6	SERC
					Matt Harward	Southwest Power Pool Inc	2	MRO
					Steven Keller	Southwest Power Pool Inc.	2	MRO
					Alan Wahlstrom	Southwest Power Pool Inc	2	MRO
					Kim Van Brimer	Southwest Power Pool Inc	2	MRO
Associated Electric Cooperative, Inc.	Todd Bennett	1,3,5,6		AECI	Michael Bax	Central Electric Power Cooperative (Missouri)	1	SERC

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 Stickle	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	5	SERC

						Cooperative, Inc.		
ACES Power Marketing	Warren Cross	2,4,5,6	MRO,RF,SERC,SPP RE,Texas RE,WECC	ACES Standards Collaborators	Arizona Electric Power Cooperative, Inc.	AEPC	1	WECC
					Hoosier Energy Rural Electric Cooperative, Inc.	HE	1	RF
					Southern Maryland Electric Cooperative	SMECO	3	RF
					North Carolina Electric Membership Corporation	NCEMC	3,4,5	SERC
					Central Iowa Power Cooperative	CIPCO	1	MRO
					East Kentucky Power Cooperative	EKPC	1,3	SERC
					Buckeye Power, Inc.	BUCK	4	RF
					Prairie Power, Inc.	PPI	1,3	SERC

1. Do you agree with the scope and objectives of this SAR? If not, please explain why you do not agree, and, if possible, provide specific language revisions that would make it acceptable to you.

Terry Harbour - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1,3

Answer No

Document Name

Comment

It is not necessary to change CIP-002 with the retirement of FAC-010. Identifying IROLs is still required in FAC-011-3 R1.3 and R3.7. The SAR does not refer to retirement of FAC-011-3 R1.3 and R3.7 nor retirement of the IROL definition in the NERC glossary. Therefore it is not necessary nor efficient to replace "IROL(s)" with its definition in the CIP-002 criteria 2.6 and 2.9.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5

Answer No

Document Name

Comment

Based on its Version 5 implementation experience, AEP believes planners are trained and have the experience necessary to evaluate BES Elements and Facilities for the risks to the BES from System instability, Cascading or uncontrolled separation. They are not, however, in the best position to evaluate Cyber risk. The following should be substituted in the Requested Information Section to relay the intent: "The Project 2015-09 SDT developed draft language to replace the reference to such IROLs in Criterion 2.6 and Criterion 2.9" with other language that would allow Planning Coordinators and Transmission Planners to identify Facilities that meet the stated criteria in the proposed modifications. Project 2015-09 SDT should work with the Project 2016-02 SDT to write explicit requirements in Planning Standards for Planning Authorities to work with Responsible Entities to evaluate BES facilities for the above risks and provide for a formal appeals process.

The drafters of the FAC standards should clearly obligate, through additional or modified requirement language, for the planning authorities to provide information regarding the impact to those facilities to Generation Owners and Transmission Owners.

In the Reliability Principals Section, only item# 8 should be checked, as CIP-002 is not a planning standard.

It appears that these two proposed SARs would be applied to the project along with the existing SAR, bringing the total number of SARs for this project to three. AEP is not aware of any precedent of multiple, **concurrent** SARs governing a NERC project at a single point in time. A SAR helps set a project's direction and scope, and while a project's SAR may be revised over time, AEP does not believe Appendix 3A (Standards Process Manual) provides an allowance for multiple, concurrent SARs to govern a single NERC project. Rather, the SPM allows a project's existing SAR to be revised to accommodate any changes believed to be necessary.

Likes 0

Dislikes 0

Response	
Marty Hostler - Northern California Power Agency - 5,6	
Answer	No
Document Name	
Comment	
It is not necessary to change CIP-002 with the retirement of FAC-010. Identifying IROLs is still required in FAC-011-3 R1.3 and R3.7. The SAR does not refer to retirement of FAC-011-3 R1.3 and R3.7 nor retirement of the IROL definition in the NERC glossary. Therefore it is not necessary nor efficient to replace "IROL(s)" with its definition in the CIP-002 criteria 2.6 and 2.9.	
Likes	0
Dislikes	0

Response	
Dennis Sismaet - Northern California Power Agency - 5,6	
Answer	No
Document Name	
Comment	
It is not necessary to change CIP-002 with the retirement of FAC-010. Identifying IROLs is still required in FAC-011-3 R1.3 and R3.7. The SAR does not refer to retirement of FAC-011-3 R1.3 and R3.7 nor retirement of the IROL definition in the NERC glossary. Therefore it is not necessary nor efficient to replace "IROL(s)" with its definition in the CIP-002 criteria 2.6 and 2.9.	
Likes	0
Dislikes	0

Response	
Wendy Center - U.S. Bureau of Reclamation - 1,5	
Answer	No
Document Name	
Comment	
Reclamation recommends simplifying the Impact Rating Criteria using the methodology described below.	

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

1. A high impact BES Cyber System has one or more of the following characteristics:

- 1.1 Is used to operate transmission lines of 500kV or above
- 1.2 Supports a sum greater than 2500kV of transmission lines above 230kV
- 1.3 Supports generation with an aggregate capacity greater than 3000MW
- 1.4 Is identified as supporting an IROL or is necessary to avoid an Adverse Reliability Impact

2. A medium impact BES Cyber System has one or more of the following characteristics:

- 2.1 Supports generation with the aggregate capacity between 1500 – 3000MW
- 2.2 Supports a sum between 1500 – 2500kV of transmission lines above 230kV
- 2.3 Supports a RAS that could negatively affect an IROL or that can perform automatic Load shedding of 300MW or more

3. A low impact BES Cyber System has one or more of the following characteristics:

- 3.1 Supports a sum less than 1500kV of transmission lines above 230kV
- 3.2 Supports transmission only between 110 – 230kV
- 3.3 Supports generation with an aggregate capacity between 75 – 1500MW
- 3.4 Supports any single generator greater than 20MW not already identified as a Medium Impact BES Cyber System
- 3.5 Supports any Facilities that are designated a blackstart resource
- 3.6 Supports any other RAS not already identified as a medium impact BES Cyber System

Likes 0

Dislikes 0

### Response

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

**Answer**

No

**Document Name**

**Comment**

First, City Light appreciates the efforts made by the drafting teams for NERC projects 2015-09 and 2016-02 to align work such that CIP-002-5.1 is revised only by one drafting team. The proposed SAR achieves this specific goal, but does not address the larger objective of consistency of effort. The

issue in that the same language about IROLs that is part of CIP-002 also is incorporated in CIP-014-2 (see Section 4.1.1.3). To ensure consistency, the IROL replacement language in both CIP-002 and CIP-014 should be handled by the same drafting team. The existing SAR for project 2016-02 does not include CIP-014 in its scope. As a result, it may be best to leave the IROL replacement language work for CIP-002 within project 2015-09, to ensure consistency between CIP-002 and CIP-014.

Second, City Light is concerned that the IROL replacement language proposed in the IROL SAR does not represent an administrative replacement of more-or-less equivalent terms, but rather has a different meaning that introduces potential for expanded scope and unintended consequences. Expanded scope because under the language as proposed, any contingency studied in a Planning Assessment that shows BES Cascading, Uncontrolled Separation, or Instability—even if the contingency is an extra-extreme case, well beyond anything considered in the traditional study of IROLs, a case examined only for exploratory purposes—thus triggers inclusion of associated Elements within scope for CIP protections. Unintended consequences because as different extra-extreme cases are studied in successive years, Elements may go in and out of scope for CIP protections on an annual basis. Unintended consequences also because to avoid these situations, Planners may choose to limit their Planning Assessments only to those contingencies required by the applicable Planning Standards and thus limit the study of grid behavior under unusual, unexpected cases. As such, City Light recommends that the proposed IROL replacement language be struck from the SAR. This change will allow the applicable drafting team, whichever it is, full flexibility to address the IROL replacement language. A reference to the proposed language might be included in the SAR, but in terms of one possible approach and not as the presumptive solution.

Thank you for your consideration.

Likes 0

Dislikes 0

**Response**

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy**

**Answer** No

**Document Name**

**Comment**

Duke Energy is concerned with the process implications that could occur by going forward with the FAC SDT's recommendations to CIP-002 at this time. Potential exists for industry confusion if one project gets ahead of the other. For example, what if the FAC project is stalled, or never fully approved by FERC? The revisions being proposed in CIP-002 then would no longer be acceptable. Going ahead with implementing the revisions suggested by another Project SDT while that Project has not been approved, and is still in active development is premature. We suggest that any revisions be put on hold until after the FAC project has been approved by FERC.

Likes 0

Dislikes 0

**Response**

**Vivian Vo - APS - Arizona Public Service Co. - 1,3,5,6**

**Answer** No

**Document Name**

**Comment**

While APS agrees with the need to modify Criteria 2.6 and 2.9 and understands the goal of efficiency this SAR is intended to achieve, APS has significant concerns regarding the consolidation of the IROL-related efforts into a CIP-focused drafting team. The criteria set forth at 2.6 and 2.9 are inherently technical and require engineering and operational expertise beyond the information technology aspects of the majority of CIP-002. More specifically, because these criteria will be premised upon the processes, assessments, and deliverables resulting from engineering analyses, APS respectfully asserts that the value the SDT is intending to recognize through the proposed transfer and consolidation is outweighed by the potential drawbacks that will result from the loss of engineering and operational expertise represented on the previous 2015-09 SDT.

Likes 0

Dislikes 0

### Response

#### John Allen - City Utilities of Springfield, Missouri - 1,3,4

Answer No

Document Name

#### Comment

While I do agree with the need to revise criterion 2.6 and 2.9 in Attachment 1 of CIP-002, I am concerned the language proposed by the SOL SDT may not be sufficiently clear (a "bright line") to prevent varying interpretations of what indicates System instability, Cascading and/or uncontrolled separation and thus properly identifying Medium Impact BES Cyber Systems. The Planning Assessments for TPL-001 include many different Contingency events that may indicate some level of System instability, Cascading and/or uncontrolled separation. However, they may not justify a medium impact rating for the associated BES Cyber Systems. Therefore, I suggest keeping the IROL designation and relying on the RC and its methodology for identification. See comments from FMPA for a possible solution.

Likes 0

Dislikes 0

### Response

#### Brandon McCormick - Florida Municipal Power Agency - 3,4,5,6 - FRCC, Group Name FMPA

Answer No

Document Name

#### Comment

FMPA appreciates the SDTs efforts with Project 2016-02 and CIP-002. We disagree with the changes being proposed for sections 2.6 and 2.9 of Attachment 1. We propose the following language for 2.6:

2.6. Generation at a single plant location or Transmission Facilities at a single station or substation location that are identified by its Reliability Coordinator, Planning Coordinator, or Transmission Planner as critical to the derivation of Interconnection Reliability Operating Limits (IROLs) and their associated contingencies.

FAC-011-3 applies to the Reliability Coordinator (RC) and requires the RC to have a documented methodology for developing SOLs and specifically (R1.3) the subset of SOLs that are IROLs. In this way the language "as critical to the derivation of Interconnection Reliability Operating Limits (IROLs)

and their associated contingencies” can be left in the standard instead of replaced as the SDT proposes. The replacement language proposed by the SDT is not clear and could possibly bring Facilities that are currently and appropriately out of scope, into scope. For example, what does “an element of each Contingency event” mean? Would it apply if it were an element of only one event, or does it have to be an element of each event studied? We recommend our proposed language above.

We see no reason to change the language for Section 2.9. The issues raised in the SAR do not point to a necessity to change Section 2.9.

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**

**Answer**

No

**Document Name**

### Comment

For 2.6

- 1) Recommend that there be a Requirement for the Planning Coordinator / Transmission Planner to notify the TOP/TO/GOP/GO that their location has been so designated.
- 2) Recommend changing “identified” to “notified”.

For 2.9

Request clarification on how the TOP/TO/GOP/GO knows their RAS has been so designated. Does PRC-012-2 help clarify?

We recommend that the proposed criteria language be removed from the SAR to provide the SDT maximum flexibility.

We recommend that associated Guideline and Technical Basis “Technical Rationale” criterion information should be revised accordingly for changes made to the Impact Rating Criteria.

Likes 0

Dislikes 0

### Response

**Todd Bennett - Associated Electric Cooperative, Inc. - 1,3,5,6, Group Name AECl**

**Answer**

Yes

<b>Document Name</b>	
<b>Comment</b>	
The SDT should review all SOL/IROL related standards and evaluate if all references to IROLs should be removed with regards to applicability and requirements specific to the planning horizon.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
None	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Sean Cavote - PSEG - 1,3,5,6 - NPCC,RF, Group Name PSEG REs</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
PSEG supports the proposed CIP-002-5.1a SAR because it provides sufficient scope and direction for the SDT to implement changes to CIP-002 required by retiring FAC-010-3.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

**Comment**

Electric Reliability Council of Texas, Inc. encourages coordination between the standards drafting teams for Projects 2015-09 and 2016-02 in order to ensure revisions achieve their intended purpose.

Likes 0

Dislikes 0

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

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response****faranak sarbaz - Los Angeles Department of Water and Power - 1,3,5,6**

**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**

**Aaron Ghodooshim - FirstEnergy - FirstEnergy Corporation - 1,3,4, Group Name** FirstEnergy Corporation

**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**

**Andrew Gallo - Austin Energy - 1,3,4,5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name** MRO NSRF

**Answer** Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Warren Cross - ACES Power Marketing - 2,4,5,6 - WECC,Texas RE,SERC,RF, Group Name ACES Standards Collaborators</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name SPP Standards Review Group</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

2. Are you aware of any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standards? If yes, please identify the jurisdiction and specific regulatory requirements.

**Brandon McCormick - Florida Municipal Power Agency - 3,4,5,6 - FRCC, Group Name FMPA**

**Answer** No

**Document Name**

**Comment**

None that we are aware of.

Likes 0

Dislikes 0

**Response**

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

**Answer** No

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy**

**Answer** No

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

**Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2**

**Answer** No

**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**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Warren Cross - ACES Power Marketing - 2,4,5,6 - WECC,Texas RE,SERC,RF, Group Name ACES Standards Collaborators**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Sean Cavote - PSEG - 1,3,5,6 - NPCC,RF, Group Name PSEG REs**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**John Allen - City Utilities of Springfield, Missouri - 1,3,4**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Vivian Vo - APS - Arizona Public Service Co. - 1,3,5,6**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Andrew Gallo - Austin Energy - 1,3,4,5,6</b>	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name Seattle City Light Ballot Body</b>	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>David Ramkalawan - Ontario Power Generation Inc. - 5</b>	
Answer	No
Document Name	
Comment	
Likes 0	

Dislikes 0

**Response**

**Aaron Ghodooshim - FirstEnergy - FirstEnergy Corporation - 1,3,4, Group Name** FirstEnergy Corporation

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Wendy Center - U.S. Bureau of Reclamation - 1,5**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Todd Bennett - Associated Electric Cooperative, Inc. - 1,3,5,6, Group Name** AECI

**Answer** No

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Dennis Sismaet - Northern California Power Agency - 5,6</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Marty Hostler - Northern California Power Agency - 5,6</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Thomas Foltz - AEP - 3,5</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

**Response**

**faranak sarbaz - Los Angeles Department of Water and Power - 1,3,5,6**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Terry Harbour - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1,3**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**3. Are there any other concerns with this SAR that haven't been covered in previous questions?**

**Terry Harbour - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1,3**

**Answer** No

**Document Name**

**Comment**

See Question 1 comments

Likes 0

Dislikes 0

**Response**

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

**Answer** No

**Document Name**

**Comment**

None

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**

**Answer** No

**Document Name**

**Comment**

We recommend that the Guidelines and Technical Basis "Technical Rationale" for Criterion 2.3 be revised to reference TPL-001-4, instead of TPL-003.

Likes 0

Dislikes 0

**Response**

**faranak sarbaz - Los Angeles Department of Water and Power - 1,3,5,6****Answer** No**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Thomas Foltz - AEP - 3,5****Answer** No**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Marty Hostler - Northern California Power Agency - 5,6****Answer** No**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Dennis Sismaet - Northern California Power Agency - 5,6****Answer** No**Document Name****Comment**

Likes 0

Dislikes 0

**Response**

**Todd Bennett - Associated Electric Cooperative, Inc. - 1,3,5,6, Group Name AECI**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Aaron Ghodooshim - FirstEnergy - FirstEnergy Corporation - 1,3,4, Group Name FirstEnergy Corporation**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name Seattle City Light Ballot Body</b>	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Andrew Gallo - Austin Energy - 1,3,4,5,6</b>	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF</b>	
Answer	No
Document Name	
Comment	
Likes 0	

Dislikes 0

**Response**

**John Allen - City Utilities of Springfield, Missouri - 1,3,4**

**Answer**

No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Sean Cavote - PSEG - 1,3,5,6 - NPCC,RF, Group Name PSEG REs**

**Answer**

No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Warren Cross - ACES Power Marketing - 2,4,5,6 - WECC,Texas RE,SERC,RF, Group Name ACES Standards Collaborators**

**Answer**

No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2**

**Answer**

No

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Russell Martin II - Salt River Project - 1,3,5,6 - WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>Is the modified language in 2.6 correct? For example, an entity performs a Planning Assessment and has 20 contingency events that result in System instability, Cascading, or uncontrolled separation. Generator X is an element in 19 of those 20 contingency events. From the modified language in 2.6, the BES Cyber Systems associated with generator X would not have a medium impact rating in accordance with 2.6 because generator X was not an element of <b>each</b> of the 20 contingency events. Is this the intent of this language?</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Wendy Center - U.S. Bureau of Reclamation - 1,5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>Reclamation recommends that impact ratings apply to all BES Cyber Systems regardless of a Responsible Entity's functional registration (Transmission or generation).</p> <p>Reclamation also recommends that if the SDT modifies the Control Center definition, at least one member with CIP expertise and at least one member with O&amp;P expertise should be on the team.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy**

**Answer** Yes

**Document Name**

**Comment**

Duke Energy is unclear on the language, and the necessity of bringing the Elements in as they are proposed in this standard. First, the terms System instability, Cascading, or uncontrolled separation may be interpreted differently depending on the PC/TP. The proposed criteria introduce a level of subjectivity that was intentionally eliminated from Version 5. Second, the term "Planning Assessment" is used which includes evaluation of Extreme Events under TPL-001. Providing a Medium impact classification to Facilities that are only identified during an Extreme Event is inappropriate. Third, with respect to generation, criterion 2.3 currently addresses a generation Facility that has been designated to avoid an Adverse Reliability Impact. The proposed criterion 2.6 is potentially duplicative with respect to generation. Fourth and most importantly, TP/PC identified SOLs/IROLs are proposed to be removed from the FAC standards. We are unclear why identification would be unnecessary in FAC-010, but those same Facilities that would have been identified are important enough to be labeled as Medium impact in this CIP standard.

Likes 0

Dislikes 0

**Response**

**Vivian Vo - APS - Arizona Public Service Co. - 1,3,5,6**

**Answer** Yes

**Document Name**

**Comment**

APS has interpreted the intent of the SAR to be a simple transference of the proposed language drafted by the Project 2015-09 STD to the Project 2016-02, to incorporate into Draft 3 of CIP-002-6 thereby consolidating the drafting and comment processes. APS is concerned that this consolidation could adversely impact the iterative comment and balloting process that normally accompanies the standards drafting process. Further, and importantly, the scope, objectives, and context around the drafting of these revisions have been shifting throughout the course of these SDTs' efforts. For this reason, APS recommends that the SAR be modified to indicate that the commenting periods shall occur as necessary based on the comments and feedback received from industry. As currently written, it appears that the SAR contemplates only one comment period, which APS believes is likely inadequate to re-calibrate the revisions and industry input.

APS is not in agreement with the proposed modifications to Criteria 2.6 as written by the Project 2025-09 STD. Not all events that result in system instability, cascading, or controlled separation would result in an IROL. This could pull in "extreme events" as defined in TPL-001-4, which is too broad. APS proposes the following language for Criterion 2.6 in order to clarify that it is not applicable to Extreme Events that are also studied within the Planning Assessment:

2.6 Generation at a single plant location or Transmission Facilities at a single station or substation location that are identified by its Planning Coordinator or Transmission Planner as an element of each P0 – P7 Contingency event included in the Planning Assessment that result in System instability, Cascading or uncontrolled separation.

Likes 0

Dislikes 0

**Response**

Brandon McCormick - Florida Municipal Power Agency - 3,4,5,6 - FRCC, Group Name FMPA

Answer Yes

Document Name

Comment

Is transferring the SAR the same as subdividing it? From the Standards Process Manual: “ ***If a SAR is subdivided and assigned to more than one drafting team, each drafting team will have a clearly defined portion of the work such that there are no overlaps and no gaps in the work to be accomplished.***” My concern is does transferring the SAR from one Project to another stay within the process outlined in the Standards Process Manual? FMPA appreciates the challenge the SDTs have of incorporating changes made to other families of standard requirements with the CIP requirements.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

The SPP Standards Review Group (“SSRG”) offers that the language proposed by Project 2015-09 SDT could be interpreted as overly broad, and could expand the list of facilities that would be identified as Medium Impact BES Cyber Systems. The SSRG recommends that the Standard Drafting Team exclude contingent elements that are classified as Extreme Events from consideration for Criterion 2.6. If Extreme Events from the Planning Assessment are included in Criterion 2.6, the list of identified facilities could grow to include facilities that would otherwise be Low Impact BES Cyber Systems. This could create confusion amongst the industry how to account for those assets. The SSRG has included proposed language for your consideration (shown as a blackline against the draft proposal):

**2.6.** Generation at a single plant location or Transmission Facilities at a single station or substation location that are identified by its Planning Coordinator or Transmission Planner as a **contingent** element of Planning event (**P1-P7**) included in the Planning Assessment that result in System instability, **for conditions such as Cascading, voltage instability, or uncontrolled islanding and cannot be adequately mitigated with a Corrective Action Plan or System adjustment.**

**2.9.** Each **Special Protection System (SPS)**, Remedial Action Scheme (RAS) or automated switching System that operates BES Elements, that, if destroyed, degraded, misused, or otherwise rendered unavailable, would result in System instability, **for conditions such as Cascading, voltage instability, or uncontrolled islanding and cannot be adequately mitigated with a Corrective Action Plan or System adjustment.**

Likes 0

Dislikes 0

Response