

Comment Report

Project Name: 2021-03 CIP-002 | CIP-002-5.1a Criterion 1.3 Revision Standard Authorization Request
Comment Period Start Date: 7/20/2023
Comment Period End Date: 8/18/2023
Associated Ballots:

There were 35 sets of responses, including comments from approximately 105 different people from approximately 89 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

- 1. Do you agree with the proposed scope as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope, please provide your recommendation and explanation.**
- 2. Provide any additional comments for the Standard drafting team to consider, if desired.**

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,RF,SERC,Texas RE,WECC	ACES Collaborators	Bob Soloman	Hoosier Energy Electric Cooperative	1	RF
					Colette Caudill	East Kentucky Power Cooperative	1,3	SERC
					Jason Proconiar	Buckeye Power, Inc.	4	RF
MRO	Jou Yang	1,2,3,4,5,6	MRO	MRO NSRF	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Chris Bills	City of Independence, Power and Light Department	5	MRO
					Fred Meyer	Algonquin Power Co.	3	MRO
					Christopher Bills	City of Independence Power & Light	3,5	MRO
					Larry Heckert	Alliant Energy Corporation Services, Inc.	4	MRO
					Marc Gomez	Southwestern Power Administration	1	MRO
					Matthew Harward	Southwest Power Pool, Inc. (RTO)	2	MRO
					Bryan Sherrow	Board of Public Utilities	1	MRO
					Terry Harbour	Berkshire Hathaway Energy - MidAmerican Energy Co.	1	MRO
					Terry Harbour	MidAmerican Energy Company	1,3	MRO

					Jamison Cawley	Nebraska Public Power District	1,3,5	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Shonda McCain	Omaha Public Power District	6	MRO
					George E Brown	Pattern Operators LP	5	MRO
					George Brown	Acciona Energy USA	5	MRO
					Jaimin Patel	Saskatchewan Power Cooperation	1	MRO
					Kimberly Bentley	Western Area Power Administration	1,6	MRO
					Jay Sethi	Manitoba Hydro	1,3,5,6	MRO
					Michael Ayotte	ITC Holdings	1	MRO
FirstEnergy - FirstEnergy Corporation	Mark Garza	1,3,4,5,6		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy-FirstEnergy	1,3,4,5,6	RF
					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF
California ISO	Monika Montez	2	WECC	ISO/RTO Council Standards Review Committee (SRC)	Monika Montez	CAISO	2	WECC
					Bobbi Welch	Midcontinent ISO, Inc.	2	RF
					Kathleen Goodman	ISO-NE	2	NPCC
					Gregory Campoli	New York Independent	2	NPCC

						System Operator		
					Helen Lainis	IESO	2	NPCC
					Elizabeth Davis	PJM	2	RF
					Charles Yeung	Southwest Power Pool, Inc. (RTO)	2	MRO
					Kennedy Meier	Electric Reliability Council of Texas, Inc.	2	Texas RE
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					Jim Howell, Jr.	Southern Company - Southern Company Generation	5	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power Coordinating Council	10	NPCC
					Alain Mukama	Hydro One Networks, Inc.	1	NPCC
					Deidre Altobell	Con Edison	1	NPCC
					Jeffrey Streifling	NB Power Corporation	1	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC
					Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC

Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC
Randy Buswell	Vermont Electric Power Company	1	NPCC
James Grant	NYISO	2	NPCC
John Pearson	ISO New England, Inc.	2	NPCC
Harishkumar Subramani Vijay Kumar	Independent Electricity System Operator	2	NPCC
Randy MacDonald	New Brunswick Power Corporation	2	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
David Burke	Orange and Rockland	3	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
David Kwan	Ontario Power Generation	4	NPCC
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
Glen Smith	Entergy Services	4	NPCC
Sean Cavote	PSEG	4	NPCC
Jason Chandler	Con Edison	5	NPCC
Tracy MacNicoll	Utility Services	5	NPCC

					Shivaz Chopra	New York Power Authority	6	NPCC
					Vijay Puran	New York State Department of Public Service	6	NPCC
					ALAN ADAMSON	New York State Reliability Council	10	NPCC
					David Kiguel	Independent	7	NPCC
					Joel Charlebois	AESI	7	NPCC
					Joshua London	Eversource Energy	1	NPCC
Western Electricity Coordinating Council	Steven Rueckert	10		WECC CIP	Steve Rueckert	WECC	10	WECC
					Morgan King	WECC	10	WECC
					Deb McEndaffer	WECC	10	WECC
					Tom Williams	WECC	10	WECC

1. Do you agree with the proposed scope as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope, please provide your recommendation and explanation.

Jonathan Robbins - AES - AES Corporation - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer Yes

Document Name

Comment

While AES Clean Energy is not registered as a TOP, it agrees with the proposed scope as it provides clarity and consistency with existing criterion for BAs (Criterion 1.2) and GOPs (Criterion 1.4).

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter

Answer Yes

Document Name

Comment

No additional comments.

Likes 0

Dislikes 0

Response

Andy Fuhrman - Minnkota Power Cooperative Inc. - 1,5 - MRO

Answer Yes

Document Name

Comment

MPC supports the comments submitted by the MRO NERC Standards Review Forum (NSRF).

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6

Answer Yes

Document Name

Comment

AZPS agrees with the proposed scope described in the SAR.

Likes 0

Dislikes 0

Response

Alain Mukama - Hydro One Networks, Inc. - 1,3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

The MRO NSRF agrees that the scope is appropriate to achieve the stated purpose.

However, the MRO NSRF notes a disconnect between the three items of the project scope and the two deliverables. We suggest re-numbering Deliverables 1 and 2 to 2 and 3 to correspond with the Project Scope and insert a new Deliverable 1 to determine if Criterion 2.6 was deliberately removed from Criterion 1.3 in draft 2 of CIP-002-5, or if there exists current justification for maintaining the omission.

As currently written, the SAR is directing implementation of Project Scope items 2 and 3 without first satisfying item 1. Project 2021-03 should first determine whether Criterion 2.6 should only require medium impact for TOP Control Centers given no cited impact to the reliability of the BES over the last 7 years.

The MRO NSRF is concerned that a TOP operating a medium impact Control Center may have to elevate the Control Center's categorization to high impact based on a transient Transmission Substation IROL declaration that could take place any given year but, due to changes in grid topology, be rescinded the following year.

The MRO NSRF understands that Project 2021-03 is currently revising Criterion 2.6 under task 2 to address this issue by adding a qualifier to IROLs limiting the Criterion to those "expected to last 36 months or longer from the date of RC provision of notice." We urge that these efforts be coordinated to address both issues simultaneously.

Likes 0

Dislikes 0

Response

Alan Kloster - Evergy - 1,3,5,6 - MRO

Answer

Yes

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question 1.

Likes 0

Dislikes 0

Response

Tristan Miller - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer

Yes

Document Name

Comment

CenterPoint Energy Houston Electric, LLC (CEHE) supports the comments as submitted by the Edison Electric Institute (EEI).

Likes 0

Dislikes 0

Response

TRACEY JOHNSON - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer Yes

Document Name

Comment

Southern Indiana Gas and Electric (SIGE) supports the comments as submitted by the Edison Electric Institute (EEI).

Likes 0

Dislikes 0

Response

Ellese Murphy - Duke Energy - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF

Answer Yes

Document Name

Comment

Duke Energy agrees with the scope, and supports EEI comments.

Likes 0

Dislikes 0

Response

Kent Feliks - AEP - 3,5,6

Answer Yes

Document Name

Comment

On behalf of AEP Service Corp. Segments 1,3,5,6.

The scope of the SAR appears to be sufficiently limited to address this singular issue/omission.

Likes 0

Dislikes 0

Response	
Chantal Mazza - Hydro-Quebec (HQ) - 1 - NPCC	
Answer	Yes
Document Name	
Comment	
<p>Recommend this revision is incorporated into a larger CIP-002 standard revision project.</p> <p>Please consider updating implementation timelines and impact if there is a responsible entity that changes from a lower impact to a higher impact scope. The implementation plan should start 24 calendar months from the entities first CIP-002 R2 review post the effective date.</p>	

Likes	0
Dislikes	0

Response	
Clay Walker - Cleco Corporation - Cleco Power - 1,3,5,6 - SERC	
Answer	Yes
Document Name	
Comment	
<p>Cleco agrees with comments provided by EEI.</p>	

Likes	0
Dislikes	0

Response	
Junji Yamaguchi - Hydro-Quebec (HQ) - 1,5	
Answer	Yes
Document Name	
Comment	
<p>Recommend this revision is incorporated into a larger CIP-002 standard revision project.</p> <p>Please consider updating implementation timelines and impact if there is a responsible entity that changes from a lower impact to a higher impact scope. The implementation plan should start 24 calendar months from the entities first CIP-002 R2 review post the effective date.</p>	

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 1,3

Answer

Yes

Document Name

Comment

Exelon is aligning with EEI in response to this question.

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

Southern Comapny agrees with the comments submitted by EEI.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer

Yes

Document Name

Comment

While EEI does not oppose the intended objectives of this SAR, we ask that the SDT ensure coordination between this SAR and the SAR identified as "Modifications to CIP-002 and CIP-014. We further ask that before Criterion 2.6 becomes an enforceable part of Criterion 1.3, that issues surrounding

short term IROL declarations be resolved in order to avoid negatively impacting Control Center or backup Control Center, used to perform the functional obligations of the Transmission Operator, that currently have an impact rating of medium impact.

Industry Need (Section) – *EEI asks that the word reinsert be changed to insert because Criterion 2.6 was never an approved or enforceable part of Criterion 1.3. While the first draft of CIP-002-5 did include Criterion 2.6 (identified as 2.8 in Draft 1) it was subsequently removed from Criterion 1.3 but added to Criterion 1.2 and 1.4, reflecting SDT intentionality. While it is clear this was intentional, noting 2.6 was purposely added to 1.2 and 1.4 during the development of draft 2, we have been unable to validate the reasoning by the SDT for including it in 1.2 and 1.4 but not in 1.3. Additionally, EEI does not agree that the insertion of 2.6 into 1.3 changes the impact ratings of the BCS at Transmission Facilities at a single station or substation location that are identified by the RC, PC or TP as critical to the derivation of IROLs. What has changed is the affected Transmission Operator Control Centers and backup Control Centers that monitor those facilities. For these reasons, we offer the following edits in bold face to the Industry Need section below:*

Criterion 1.3 needs to have Criterion 2.6 **inserted** into Criterion 1.3 for the Transmission Operator (TOP) to ensure proper high-impact categorization of BES Cyber System(s) related to Transmission **Operator Control Centers or backup Control Centers that perform the TOP function for assets that meet Criterion 2.6** are identified as critical to the derivation of Interconnection Reliability Operating Limits (IROLs) and their associated contingencies as also required of the Balancing Authority (BA) in Criterion 1.2 and the Generator Operator (GOP) in Criterion 1.4.

Purpose or Goal (Section): *EEI also asks that the SDT modify some of the language and implied scope as contained in the Purpose or Goal section to address similar mentioned stated in our comments for the Industry Needs section above. (See our proposed edits in bold below).*

The proposed project will require the TOP to categorize its **Control Center (and backup Control Center)** BES Cyber System(s) as high impact that meet Criterion 2.6, as is also required of the BA and GOP in Criterion 1.2 and 1.4, respectively. *(Suggest removing sentence beginning with “By including Criterion 2.6 in Criterion 1.3)*

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

Yes

Document Name

Comment

NV Energy agrees that the scope is appropriate to achieve the stated purpose.

However, NV Energy notes a disconnect between the three items of the project scope and the two deliverables. We suggest re-numbering Deliverables 1 and 2 to 2 and 3 to correspond with the Project Scope and insert a new Deliverable 1 to determine if Criterion 2.6 was deliberately removed from Criterion 1.3 in draft 2 of CIP-002-5, or if there exists current justification for maintaining the omission.

As currently written, the SAR is directing implementation of Project Scope items 2 and 3 without first satisfying item 1. Project 2021-03 should first determine whether Criterion 2.6 should only require medium impact for TOP Control Centers given no cited impact to the reliability of the BES over the last 7 years.

NV Energy is concerned that a TOP operating a medium impact Control Center may have to elevate the Control Center's categorization to high impact based on a transient Transmission Substation IROL declaration that could take place any given year but, due to changes in grid topology, be rescinded the following year.

NV Energy understands that Project 2021-03 is currently revising Criterion 2.6 under task 2 to address this issue by adding a qualifier to IROLs limiting the Criterion to those "expected to last 36 months or longer from the date of RC provision of notice." We urge that these efforts be coordinated to address both issues simultaneously.

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer Yes

Document Name

Comment

Recommend this revision be incorporated into a larger CIP-002 standard revision project.

Please consider updating implementation timelines and impact if there is a responsible entity that changes from a lower impact to a higher impact scope. The implementation plan should start 24 calendar months from the entity's first CIP-002 R2 review post the effective date.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Texas RE supports this Standard Authorization Request (SAR).

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer Yes

Document Name

Comment

Ameren agrees with and supports EEI's comments, as well as acknowledges that including criterion 2.6 in criterion 1.3 does not change current categorization of control centers.

However, Ameren is concerned that the "Project Scope" indicated in Step 3 of this SAR lacks the appropriate level of specificity and may cause unintended interpretations and impact to other CIP standards and associated documents.

Likes 0

Dislikes 0

Response

Monika Montez - California ISO - 2 - WECC, Group Name ISO/RTO Council Standards Review Committee (SRC)

Answer Yes

Document Name

Comment

The ISO/RTO Council Standards Review Committee (SRC) supports NERC's intention to align criterion 1.3 with criteria 1.2 and 1.4 in CIP-002-5.1a, Attachment 1. However, the SRC sees the existing misalignment as a low risk to the reliability and security of the BES, and therefore believes that this SAR is a lower priority than most other SARs currently being addressed by NERC Reliability standard projects. Other criteria in CIP-002-5.1a already capture the majority of Control Centers and backup Control Centers that would be impacted by the proposed revision to criterion 1.3, and only a few additional entities, with low impact to the BES, are likely to be affected by this proposed SAR. Therefore, the SRC recommends that the priority level of this SAR be set appropriately. Since the current Reliability Standards Process does not consider the relative risk and urgency of proposed Reliability standards, the industry resources that will be needed to address this proposed SAR need to be weighed with the reliability impacts of the issue the SAR proposes to address relative to the numerous other SARs currently being addressed in Reliability standards projects.

Likes 0

Dislikes 0

Response

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer Yes

Document Name

Comment

ERCOT joins the comments submitted by the ISO/RTO Council Standards Review Committee (SRC) and adopts them as its own.

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Karla Weaver - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Stephen Stafford - Georgia Transmission Corporation - 1 - SERC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Matt Lewis - Lower Colorado River Authority - 1,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC CIP

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 1,5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Gail Elliott - International Transmission Company Holdings Corporation - NA - Not Applicable - MRO,RF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 5,6	
Answer	
Document Name	
Comment	
These changes have no impact on Constellation Generation, therefore Constellation does not have additional comments.	
Kimberly Turco on behalf of Constellation Energy Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	

2. Provide any additional comments for the Standard drafting team to consider, if desired.

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer

Document Name

Comment

ACES would like to thank the SDT for allowing us to comment

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer

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 NPCC RSC

Answer

Document Name

Comment

We do acknowledge an inconsistency.

It is difficult to keep straight the different projects and SARs impacting CIP-002 in parallel.

We recommend NERC consider revising the NERC Rules of Procedure or Standards Process Manual to establish a formalized process for evaluating the feasibility of consolidating projects when a single standard is impacted by multiple SARs and separate Standard Drafting Teams (SDTs). We also recommend NERC consider a common mode of communication with all stakeholders when projects are consolidated. Consolidating projects tied to the same standard not only paves the way for enhanced uniformity and consistency but also improves the efficiency of the SDT and industry review process. It may also prevent administrative issues such as the one indicated by the need for this SAR.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

Document Name

Comment

Given the magnitude of increased compliance obligations Transmission Operators that currently only operate medium impact Control Centers may face as a result of this project, NV Energy recommends a 36-month Implementation Plan for this part of the project.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 1,3

Answer

Document Name

Comment

Exelon is aligning with EEI in response to this question.

Likes 0

Dislikes 0

Response

Junji Yamaguchi - Hydro-Quebec (HQ) - 1,5

Answer

Document Name

Comment

We do acknowledge an inconsistency.
It is difficult to keep straight the different projects and SARs impacting CIP-002 in parallel.
We recommend NERC consider revising the NERC Rules of Procedure or Standards Process Manual to establish a formalized process for evaluating the feasibility of consolidating projects when a single standard is impacted by multiple SARDS and separate Standard Drafting Teams (SDTs). We also recommend NERC consider a common mode for communication to all stakeholders when projects are consolidated. Consolidating projects tied to the

same standard not only paves the way for enhanced uniformity and consistency but also improves the efficiency of the SDT and industry review process. It may also prevent administrative issues such as the one indicated by the need for this SAR.

Likes 0

Dislikes 0

Response

Chantal Mazza - Hydro-Quebec (HQ) - 1 - NPCC

Answer

Document Name

Comment

We do acknowledge an inconsistency.

It is difficult to keep straight the different projects and SARs impacting CIP-002 in parallel.

We recommend NERC consider revising the NERC Rules of Procedure or Standards Process Manual to establish a formalized process for evaluating the feasibility of consolidating projects when a single standard is impacted by multiple SARDS and separate Standard Drafting Teams (SDTs). We also recommend NERC consider a common mode for communication to all stakeholders when projects are consolidated. Consolidating projects tied to the same standard not only paves the way for enhanced uniformity and consistency but also improves the efficiency of the SDT and industry review process. It may also prevent administrative issues such as the one indicated by the need for this SAR.

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 1,5

Answer

Document Name

Comment

None at this time.

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC CIP

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

TRACEY JOHNSON - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

Document Name

Comment

Given the magnitude of increased compliance obligations Transmission Operators that currently only operate medium impact Control Centers may face as a result of this project, the MRO NSRF recommends a 36-month Implementation Plan for this part of the project.

Likes 0

Dislikes 0

Response

Alain Mukama - Hydro One Networks, Inc. - 1,3

Answer

Document Name

Comment

As this SAR is minor, it would be more effective to incorporate this change along with other approved change proposal into a larger CIP-002 standard revision project.

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6

Answer

Document Name

Comment

AZPS no additional comments for the Standard drafting team to consider at this time.

Likes 0

Dislikes 0

Response

Andy Fuhrman - Minnkota Power Cooperative Inc. - 1,5 - MRO

Answer

Document Name

Comment

MPC supports the comments submitted by the MRO NERC Standards Review Forum (NSRF).

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter

Answer

Document Name

Comment

No additional comments.

Likes 0

Dislikes 0

Response