

Comment Report

Project Name: 2020-03 Supply Chain Low Impact Revisions | Draft 3
Comment Period Start Date: 7/6/2022
Comment Period End Date: 8/19/2022
Associated Ballots: 2020-03 Supply Chain Low Impact Revisions CIP-003-XAB 3 ST

There were 75 sets of responses, including comments from approximately 175 different people from approximately 105 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree the updated language proposed in Attachment 1 Section 6 addresses the risk of malicious communication and vendor remote access to low impact BES cyber systems as directed by the [NERC Board resolution](#)? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.
2. The team has added clarifying language to limit the scope of this access to remote access that is conducted by vendors. Do you believe that this language is clear? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.
3. Has the SDT clarified that Attachment 1 Section 6 only addresses vendor's access to low impact assets containing BES cyber systems from remote locations? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.
4. The SDT has added clarifying language that limits the scope to Section 3.1. Do you believe the language in Attachment 1 Section 6 limits the scope to low impact BES cyber systems? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.
5. The SDT proposes that the modifications in CIP-003-X meet the NERC Board resolution 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.
6. The SDT is proposing a 36-month implementation plan for Attachment 1, Section 6 based on industry feedback. Would these proposed timeframes give enough time to put into place process, procedures or technology to meet the proposed language in Section 6? If you think an alternate timeframe is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.
7. Provide any additional comments for the standard drafting team to consider, including the provided technical rationale document, if desired.

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
BC Hydro and Power Authority	Adrian Andreoiu	1	WECC	BC Hydro	Hootan Jarollahi	BC Hydro and Power Authority	3	WECC
					Helen Hamilton Harding	BC Hydro and Power Authority	5	WECC
					Adrian Andreoiu	BC Hydro and Power Authority	1	WECC
Tennessee Valley Authority	Brian Millard	1,3,5,6	SERC	Tennessee Valley Authority	Kurtz, Bryan G.	Tennessee Valley Authority	1	SERC
					Grant, Ian S.	Tennessee Valley Authority	3	SERC
					Thomas, M. Lee	Tennessee Valley Authority	5	SERC
					Parsons, Marjorie S.	Tennessee Valley Authority	6	SERC
Chris Carnesi	Chris Carnesi		WECC	NCPA	Marty Hostler	Northern California Power Agency	4	WECC
					Dennis Sismaet	Northern California Power Agency	6	WECC
Santee Cooper	James Poston	3		Santee Cooper	Rodger Blakely	Santee Cooper	1,3,5,6	SERC
					Rene' Free	Santee Cooper	1,3,5,6	SERC
					Wanda Williams	Santee Cooper	1,3,5,6	SERC
					Bridget Coffman	Santee Cooper	1,3,5,6	SERC
					Bob Rhett	Santee Cooper	1,3,5,6	SERC
Jennie Wike	Jennie Wike		WECC	Tacoma Power	Jennie Wike	Tacoma Public Utilities	1,3,4,5,6	WECC

					John Merrell	Tacoma Public Utilities (Tacoma, WA)	1	WECC
					Marc Donaldson	Tacoma Public Utilities (Tacoma, WA)	3	WECC
					Hien Ho	Tacoma Public Utilities (Tacoma, WA)	4	WECC
					Terry Gifford	Tacoma Public Utilities (Tacoma, WA)	6	WECC
					Ozan Ferrin	Tacoma Public Utilities (Tacoma, WA)	5	WECC
ACES Power Marketing	Jodirah Green	6	MRO,NA - Not Applicable,RF,SERC,Texas RE,WECC	ACES Standard Collaborations	Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1	SERC
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Bill Hutchison	Southern Illinois Power Cooperative	1	SERC
					Susan Sosbe	Wabash Valley Power Association	3	RF
					Nick Fogleman	Prairie Power, Inc.	1	SERC
					Scott Brame	North Carolina Electric Membership Corporation	3,4,5	SERC
					Shari Heino	Brazos Electric Power Cooperative, Inc.	5	Texas RE
					Ryan Strom	Buckeye	5	RF

						Power, Inc.			
						Colette Caudill	East Kentucky Power Cooperative	1,3	SERC
						Michael Brytowski	Great River Energy	3	MRO
						Kylee Kropp	Sunflower Electric Power Corporation	1	MRO
LaKenya VanNorman	LaKenya VanNorman		SERC	Florida Municipal Power Agency (FMPA)	Chris Gowder	Florida Municipal Power Agency	5	SERC	
					Dan O'Hagan	Florida Municipal Power Agency	4	SERC	
					Carl Turner	Florida Municipal Power Agency	3	SERC	
					Jade Bulitta	Florida Municipal Power Agency	6	SERC	
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF	
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF	
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF	
					Tricia Bynum	FirstEnergy - FirstEnergy Corporation	6	RF	
					Mark Garza	FirstEnergy-FirstEnergy	4	RF	
Public Utility District No. 1 of Chelan County	Meaghan Connell	5		PUD No. 1 of Chelan County	Joyce Gundry	Public Utility District No. 1 of Chelan County	3	WECC	
					Diane Landry	Public Utility	1	WECC	

						District No. 1 of Chelan County		
					Glen Pruitt	Public Utility District No. 1 of Chelan County	6	WECC
					Meaghan Connell	Public Utility District No. 1 Chelan County	5	WECC
Michael Johnson	Michael Johnson		WECC	PG&E All Segments	Marco Rios	Pacific Gas and Electric Company	1	WECC
					Sandra Ellis	Pacific Gas and Electric Company	3	WECC
					James Mearns	Pacific Gas and Electric Company	5	WECC
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
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
					Jim Howell	Southern Company - Southern Company Services, Inc. - Gen	5	SERC
DTE Energy	patricia ireland	4		DTE Energy	Patricia Ireland	DTE Energy - Detroit Edison	4	RF
					Karie Barczak	DTE Energy - Detroit Edison Company	3	RF
					Adrian	DTE Energy -	5	RF

					Raducea	Detroit Edison Company		
Paul Haase	Paul Haase		WECC	Seattle City Light	Pawel Krupa	Seattle City Light	1	WECC
					Dana Wheelock	Seattle City Light	3	WECC
					Hao Li	Seattle City Light	4	WECC
					Mike Haynes	Seattle City Light	5	WECC
					Bud Freeman	Seattle City Light	6	WECC
					Paul Haase	Seattle City Light	1,3,4,5,6	WECC
					Ginette Lacasse	Seattle City Light	1,3,4,5,6	WECC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC Regional Standards Committee	Gerry Dunbar	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Harish Vijay Kumar	IESO	2	NPCC
					David Kiguel	Independent	7	NPCC
					Nick Kowalczyk	Orange and Rockland	1	NPCC
					Joel Charlebois	AESI - Acumen Engineered Solutions International Inc.	5	NPCC
					Mike Cooke	Ontario Power	4	NPCC

	Generation, Inc.		
Salvatore Spagnolo	New York Power Authority	1	NPCC
Shivaz Chopra	New York Power Authority	5	NPCC
Deidre Altobell	Con Ed - Consolidated Edison	4	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Cristhian Godoy	Con Ed - Consolidated Edison Co. of New York	6	NPCC
Nurul Abser	NB Power Corporation	1	NPCC
Randy MacDonald	NB Power Corporation	2	NPCC
Michael Ridolfino	Central Hudson Gas and Electric	1	NPCC
Vijay Puran	NYSPS	6	NPCC
ALAN ADAMSON	New York State Reliability Council	10	NPCC
Sean Cavote	PSEG - Public Service Electric and Gas Co.	1	NPCC
Brian Robinson	Utility Services	5	NPCC
Quintin Lee	Eversource Energy	1	NPCC
John Pearson	ISONE	2	NPCC

					Nicolas Turcotte	Hydro-Qu?bec TransEnergie	1	NPCC
					Chantal Mazza	Hydro-Quebec	2	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC
					Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
Dominion - Dominion Resources, Inc.	Sean Bodkin	3,5,6		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
					Rachel Snead	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable
Tim Kelley	Tim Kelley		WECC	SMUD / BANC	Nicole Looney	Sacramento Municipal Utility District	3	WECC
					Charles Norton	Sacramento Municipal Utility District	6	WECC
					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Foung Mua	Sacramento Municipal Utility District	4	WECC
					Nicole Goi	Sacramento Municipal Utility District	5	WECC
					Kevin Smith	Balancing Authority of Northern California	1	WECC

1. Do you agree the updated language proposed in Attachment 1 Section 6 addresses the risk of malicious communication and vendor remote access to low impact BES cyber systems as directed by the [NERC Board resolution](#)? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6, Group Name Dominion

Answer No

Document Name

Comment

The introduction of “detecting known or suspected malicious communications” for low impact BES Cyber Systems would be more stringent as compared to CIP-005 R1.5 since Medium Impact BES Cyber Systems are not applicable in the current version of the standards without adding any additional reliability benefits.

Likes 4 Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; WEC Energy Group, Inc., 3, Kane Christine; Central Hudson Gas & Electric Corp., 1, Ridolfino Michael; Jones Barry On Behalf of: sean erickson, Western Area Power Administration, 1, 6;

Dislikes 0

Response

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

Answer No

Document Name

Comment

As with the previous draft, Section 6.3 still creates a higher bar for some assets containing low impact BCS than for most medium impact BCS (i.e., those outside of control centers). Section 6.3 would require detection of malicious inbound and outbound communications for low impact BCS with vendor remote connectivity. In the current version and next effective version of CIP-005, Part 1.5 requires detection of malicious inbound and outbound communications only for medium impact BCS at Control Centers.

BPA recognizes that the NERC Board Resolution directs the drafting team to modify CIP-003 to “..include policies for low impact BES Cyber Systems to: (1) detect known or suspected malicious communications for both inbound and outbound communications...” BPA also acknowledges that the Technical Rationale attempts to identify more robust controls from CIP-005-6 that offset this inconsistency. However, this inconsistency results in a complicated and confusing compliance approach: entities will be required to develop separate evidence packages for Low and Medium (outside of control centers) substations even if they implement identical solutions across both.

Likes 4 Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre; Platte River Power Authority, 6, Martz Sabrina; Platte River Power Authority, 3, Kiess Wade; Wabash Valley Power Association, 3, Sosbe Susan

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro**Answer** No**Document Name****Comment**

BC Hydro appreciates the opportunity to comment and thanks the drafting team for their continued efforts.

The language proposed in CIP-003-X attachment 1 Section 6 does not comprehensively address the risk of malicious communication and vendor remote access to low impact BES cyber systems with possible areas of improvement as follows:

- The language used in CIP-003-X attachment 1 Section 6.3 is referring to 'known or suspected malicious communications'. BC Hydro recommends adding more clarity and provide examples of use cases and applicability. Specifically, context and usage of the term 'malicious communication' needs more clarity and BC Hydro requests to provide the context and usage with pertinent examples and use case scenarios to improve understanding and to better scope the requirements.
- Similarly, BC Hydro proposes defining and adding term 'Vendor Electronic Remote Access' to NERC Glossary of Terms.
- Who and what is considered a 'Vendor' also need to be defined in the Glossary of Terms for clarity and understanding.

CIP-005-5 R1.5 does not apply to Medium impact BCS if they are not at Control Centers. Why and how the Requirement in Section 6.3 applies to 'Low Impact BCS' is not very clear from the language used. The Section 6.3 does offer possible mitigation of the risks i.e., 'malicious communication and vendor remote acces's however this is even more stringent on Low Impact BCS in comparison to CIP-005-5 R1.5.

BC Hydro recommends rewording or removing Section 6.3 completely.

Likes 1 Jones Barry On Behalf of: sean erickson, Western Area Power Administration, 1, 6;

Dislikes 0

Response**James Poston - Santee Cooper - 3, Group Name Santee Cooper****Answer** No**Document Name****Comment**

Attachment 1 Section 6 was introduced as an objective risk-based requirement; however, it lists prescriptive actions. An entity can mitigate the risks associated with vendor electronic remote access through various means and still address disabling of vendor electric remote access, and malicious communication protection. As such the language should read more like an objective risk-based requirement allowing an entity to have a bit more leeway to comply with the requirements.

Likes 0

Dislikes 0

Response**Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities**

(Tacoma, WA), 1, 4, 5, 6, 3; John Nierenberg, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer No

Document Name

Comment

Tacoma Power does not agree that the proposed language in Attachment 1, Section 6 addresses the risk of malicious communication. The Section 6 introduction includes an objective risk-based high-level requirement, yet prescriptive actions are listed in the sub-parts. An entity can mitigate the risks associated with vendor electronic remote access through various means and still address disabling of vendor electric remote access, and malicious communication protection.

Tacoma Power suggests the following wording to avoid prescriptive language in the sub-parts (changes noted in italics and important word changes are highlighted with bold text):

Section 6: Vendor Electronic Remote Access Security Controls: For assets containing low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible Entity shall implement a process to mitigate risks associated with vendor electronic remote access, where such access has been established under Section 3.1. These processes shall **address**:

*6.1 determining and disabling **active** vendor electronic remote access sessions, **if applicable**; and*

6.2 malicious communications.

By altering the wording as shown above, an entity would be able to comply through multiple means and would not HAVE to implement a detection method to mitigate malicious communication. For example, if an Entity makes use of an Intermediate System for all low impact BCS remote access, which would mitigate the risk of vendor electronic remote access malicious communications, they have addressed malicious communications without having to also detect malicious communications, which in this scenario is extremely unlikely to occur.

Likes 3

Platte River Power Authority, 6, Martz Sabrina; Platte River Power Authority, 3, Kiess Wade; Public Utility District No. 1 of Snohomish County, 1, Rhoads Alyssia

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer No

Document Name

Comment

Texas RE continues to be concerned that the language in Attachment 1, Section 6 is limited to vendor remote access. Texas RE is concerned that Section 6's focus on vendor remote access does not capture the full range of malicious communications contemplated under the low impact guidance documents. In the event of a supply chain attack, malicious communications can occur whether or not a Responsible Entity has established an authorized channel for vendor communications. Additionally, in the event of a supply chain attack, malicious communications can potentially be initiated from compromised Cyber Assets attempting to communicate with a Command and Control server. Importantly, these can occur along logical pathways for which where the Responsible Entity has deliberately not established channels for vendor remote access.

A supply chain attack, such as the supply chain attack that resulted in the 2020 United States federal government data breach, is not typically conducted directly by compromised vendors themselves. These attacks are typically conducted by malicious third parties that do not have a formal business relationship with the vendor or the affected Registered Entity. As such, scoping this requirement to only address remote access that is conducted directly by vendors would deliberately exclude from scope the exact communications that need to be monitored.

Based on this perspective, therefore, Texas RE recommends that the SDT clarify that CIP-003 low impact monitoring obligations extend to all inbound and outbound network traffic to mitigate the risk of suspicious or malicious traffic going unnoticed, not just in situations of authorized vendor remote access. Texas RE recommends moving the proposed language in Attachment 1, Section 6.2 to Section 3 (Electronic Access Controls) so it is clear malicious communication monitoring and detection method obligations apply to all communications, not simply vendor remote access communications.

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Since Section 6 has introduced an objective risk-based high-level requirement, yet prescriptive actions are listed. An entity can mitigate the risks associated with vendor electronic remote access through various means and still address disabling of vendor electric remote access, and malicious communication protection.

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1,5

Answer No

Document Name

Comment

Reclamation recommends the SDT align the CIP-003 Attachment 1 Section 6 language with CIP-005-6 R2 and use NERC-defined terms where possible. The content of Section 6 should be included within Attachment 1 Section 3 and not made into a new section. Reclamation recommends adding "if technically feasible" to Section 6.2 to account for legacy systems that are not capable of detecting known or suspected malicious communications for both inbound and outbound communications.

Reclamation recommends the following changes to Section 6:

From:

Vendor remote access: For assets containing low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible Entity shall implement a process to mitigate risks associated with vendor remote access (including interactive and system-to-system access) to low impact BES Cyber Systems that includes:

6.1 Having one or more method(s) for determining vendor remote access sessions;

6.2 Having one or more method(s) for detecting known or suspected malicious communications for both inbound and outbound communications; and

6.3 Having one or more method(s) for disabling vendor remote access.

To:

Vendor remote access: For assets containing low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible Entity shall implement a process to mitigate risks associated with active vendor remote access sessions (including Interactive Remote Access and system-to-system remote access) to low impact BES Cyber Systems that includes:

6.1 Having one or more method(s) for identifying active vendor remote access sessions;

6.2 If technically feasible, have one or more method(s) for detecting known or suspected malicious communications for both inbound and outbound communications; and

6.3 Having one or more method(s) for disabling active vendor remote access.

The phrase “determining active vendor remote access sessions” is not clear. Reclamation recommends using the same language as in the Technical Rationale, which refers more specifically to “when sessions are initiated.”

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Fong Mua, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Goi, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; - Tim Kelley, Group Name SMUD / BANC

Answer

No

Document Name

Comment

SMUD and BANC support Tacoma Power's comment.

Likes 0

Dislikes 0

Response

Jesus Sammy Alcaraz - Imperial Irrigation District - 1

Answer No

Document Name

Comment

Section 6.3 still creates a higher bar for some assets containing low impact BCS than for most medium impact BCS (i.e., those outside of control centers). It is still not clear if VPN connections established with support vendors fully adheres to requirement or additional steps such as IDS/IPS are required. The Section 6 introduction includes an objective risk-based high-level requirement, yet prescriptive actions are listed in the sub-parts.

Likes 0

Dislikes 0

Response

Chris Carnesi - Chris Carnesi On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - Chris Carnesi, Group Name NCPA

Answer No

Document Name

Comment

NCPA does not agree with prescriptive language for 6.3 as it relates to detect known or suspected malicious communications. This would be more arduous for Low impact entities to implement compared to non-Control Center Medium Impact facilities as they don't need to comply with CIP-005 R1.5. This creates an imbalance of requiring lower risk facilities to comply with a more strenuous requirement than higher risk facilities. At least limiting 6.3's scope to only Low Impact Control Centers would be somewhat congruent with the CIP-005 R1.5 requirement.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 1,5

Answer No

Document Name

Comment

Based on comments below, we conclude the proposed updates do not adequately address the risk of malicious communication and vendor remote access.

Likes 0

Dislikes 0

Response

patricia ireland - DTE Energy - 4, Group Name DTE Energy

Answer No

Document Name

Comment

Malicious communication can arguably be effectively addressed with Attachment 1, requirements 6.1 and 6.2. We believe that Requirement 6.3 is excessive.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

It is not clear that Section 6.3 only applies to only inbound and outbound vendor communication and not all communication established under Section 3.1. If Section 6.3 is applicable to all communications then it should be moved to Section 3.1.

Likes 0

Dislikes 0

Response

Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5

Answer No

Document Name

Comment

Based on comments below, we conclude the proposed updates do not adequately address the risk of malicious communication and vendor remote access.

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 Regional Standards Committee

Answer No

Document Name

Comment

Based on the comments below, we conclude the proposed updates do not adequately address the risk of malicious communication and vendor remote access.

Likes 0

Dislikes 0

Response

Russell Noble - Cowlitz County PUD - 3

Answer No

Document Name

Comment

See comments as supplied by Deanna Carlson from Cowlitz PUD.

Likes 0

Dislikes 0

Response

Deanna Carlson - Cowlitz County PUD - 5

Answer No

Document Name

Comment

Cowlitz PUD does not agree that the proposed language in Attachment 1, Section 6 addresses the risk of active malicious communications and is too prescriptive in the actions listed in Section 6.1 – 6.3. Entities can mitigate the risks associated with vendor electronic remote access through various means and still address the NERC Board Resolution to detect, determine, and disable active vendor electric remote access, and malicious communications. The language should read more like an objective risk-based requirement allowing an entity to have a bit more leeway to comply with the requirement. Additionally, as written Section 6.3 appears to be applicable to all communications and should then be removed from Section 6.3 and

placed in Section 3.1 if this was the intent.

Likes 0

Dislikes 0

Response

Joe Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC

Answer

Yes

Document Name

Comment

Xcel Energy supports the comments of EEI and the MRO NSRF.

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 agrees that the proposed language in Attachment 1 Section 6 addresses the risk of malicious communication and vendor remote access to low impact BES cyber systems as directed by the NERC Board resolution.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Ed Hanson, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer

Yes

Document Name

Comment

PG&E agrees the updated language in Attachment 1, Section 6 addresses the risks noted by the NERC Board of Trustees resolution.

Likes 0

Dislikes 0

Response

Justin Welty - NextEra Energy - Florida Power and Light Co. - 6

Answer

Yes

Document Name

Comment

NextEra Energy supports EEI's comment: EEI agrees that the updated language proposed in Draft 3 of Attachment 1 Section 6 addresses the risk of malicious communication and vendor remote access to low impact BES cyber systems as directed by the [NERC Board resolution](#)

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

Yes

Document Name

Comment

Yes, Constellation agrees the the updated language addresses the risk of malicious communication and vendor remote access to low impact BES cyber systems.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Alison Mackellar - Constellation - 5

Answer

Yes

Document Name

Comment

Yes, Constellation agrees the the updated language addresses the risk of malicious communication and vendor remote access to low impact BES cyber systems.

Kimberly Turco on behalf of Constellation Segements 5 and 6

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

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

Jamie Monette - Allete - Minnesota Power, Inc. - 1

Answer Yes

Document Name

Comment

Minnesota Power is in agreement with EEI's comments.

Likes 0

Dislikes 0

Response

Clay Walker - Clay Walker On Behalf of: John Lindsey, Cleco Corporation, 6, 5, 1, 3; Maurice Paulk, Cleco Corporation, 6, 5, 1, 3; Robert Hirschak, Cleco Corporation, 6, 5, 1, 3; - Clay Walker

Answer Yes

Document Name	
Comment	
Cleco agrees with EEI comments.	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 6, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
<p>While the language added to the standard does meet the NERC Board resolution, we still strongly disagree with adding malicious code detections for low impact BCS (specifically Section 6.3) as this control is not a requirement for medium impact BCS (not at Control Centers). Although these new requirements come from the FERC/NERC resolution, there are much greater risks to the overall BES/BPS, at medium impact BCS than low impact BCS. We feel the only resolution to this, is to add the same controls to medium impact BCS or drop the requirement for low impact. If we as an ERO are taking a risk based approach and the FERC/NERC resolution into consideration, then adding the requirement to medium impact BCS is the only possible resolution to satisfy us and the FERC/NERC resolution. Based on our research there is not a resolution to add malicious code detections to medium impact BCS and therefore we will not be in favor of the controls for low impact.</p>	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
<p>EEI agrees that the updated language proposed in Draft 3 of Attachment 1 Section 6 addresses the risk of malicious communication and vendor remote access to low impact BES cyber systems as directed by the NERC Board resolution.</p>	
Likes 0	
Dislikes 0	
Response	

Daniel Gacek - Exelon - 1

Answer	Yes
---------------	-----

Document Name	
----------------------	--

Comment

Exelon is aligning with EEI in response to this question.

Likes 0	
---------	--

Dislikes 0	
------------	--

Response

Kinte Whitehead - Exelon - 3

Answer	Yes
---------------	-----

Document Name	
----------------------	--

Comment

Exelon is aligning with EEI in response to this question.

Likes 0	
---------	--

Dislikes 0	
------------	--

Response

Benjamin Winslett - Georgia System Operations Corporation - 4

Answer	Yes
---------------	-----

Document Name	2020-03_Supply_Chain_Lows_Unofficial_Comment_Form (GSOC FINAL).docx
----------------------	---

Comment

GSOC believes the updated language in section 6 addresses the risk; however modifications to section 6.3 introduce confusion regarding the scope of the requirement over the last posting by arguably including non-vendor related communications in the language. This broadening of language could be read to include asset-level monitoring of all inbound and outbound communication for known or suspected malicious communications is a significant departure from the previous draft and would result in an unduly burdensome compliance mandate. The Technical Rationale developed by the SDT states that section 6.3 "is scoped to focus only on vendors' communications per the NERC Board resolution and the supply chain report." However, the SDT has removed the language from 6.3 that clarifies this scope. Since the SDT moved the language that states "where such access has been established under Section 3.1" to the main part of Section 6, this language could be read as requiring this detection to occur at the point where access is established under Section 3.1 which defines that access at each asset containing low impact assets. Further, 6.3 could be read to require all malicious communications to be detected, regardless of whether it is vendor communication or not as there is no reference to vendor communication in the control specified in section 6.3.

GSOC respectfully proposes the following wording that reverts the language in 6.3 to the language of the prior posting:

Vendor Electronic Remote Access Security Controls: For assets containing
low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible

Entity shall implement a process to mitigate risks associated with vendor electronic remote access, where such access has been established under Section 3.1.

These processes shall include:

6.1 One or more method(s) for determining vendor electronic remote
access;

6.2 One or more method(s) for disabling vendor electronic remote
access; and

6.3 One or more method(s) for detecting known or suspected malicious communications for both inbound and outbound vendor communications.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

ITC is in agreement with the EEI response

Likes 0

Dislikes 0

Response

Kenya Streeter - Edison International - Southern California Edison Company - 1,3,5,6

Answer

Yes

Document Name

Comment

See comments submitted by the Edison Electric Institute

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nicholas Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Eric Sutlief - CMS Energy - Consumers Energy Company - 3,4,5 - RF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Steffensen - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Martin Sidor - NRG - NRG Energy, Inc. - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lan Nguyen - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Meaghan Connell - Public Utility District No. 1 of Chelan County - 5, Group Name PUD No. 1 of Chelan County

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Erik Gustafson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC, Texas RE

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ron Wilgers - Black Hills Corporation - 3 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; - MEAG Power - 1 - SERC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Buckman - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
JT Kuehne - AEP - 6	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Michelle Amarantos - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes	0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Gail Golden - Entergy - Entergy Services, Inc. - 5

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dania Colon - Orlando Utilities Commission - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Megan Caulson - Megan Caulson On Behalf of: Jennifer Wright, Sempra - San Diego Gas and Electric, 5, 3, 1; - Megan Caulson

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**David Jendras - Ameren - Ameren Services - 3****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**James Baldwin - Lower Colorado River Authority - 1****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Mark Ciufu - Mark Ciufu On Behalf of: Payam Farahbakhsh, Hydro One Networks, Inc., 3, 1; - Mark Ciufu****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Devon Tremont - Taunton Municipal Lighting Plant - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Barry Jones - Barry Jones On Behalf of: sean erickson, Western Area Power Administration, 1, 6; - Barry Jones

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaKenya VanNorman - LaKenya VanNorman On Behalf of: Chris Gowder, Florida Municipal Power Agency, 5, 3, 4, 6; Richard Montgomery, Florida Municipal Power Agency, 5, 3, 4, 6; - LaKenya VanNorman, Group Name Florida Municipal Power Agency (FMPA)

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Paul Haase - Paul Haase On Behalf of: Hao Li, Seattle City Light, 4, 5, 3, 6, 1; - Paul Haase, Group Name Seattle City Light

Answer

Document Name

Comment	
Seattle City Light abstains	
Likes 0	
Dislikes 0	
Response	

2. The team has added clarifying language to limit the scope of this access to remote access that is conducted by vendors. Do you believe that this language is clear? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Deanna Carlson - Cowlitz County PUD - 5

Answer No

Document Name

Comment

Cowlitz PUD would like to see the terms 'vendor electronic remote access'; added to Section 6.3 as it is included in Section 6.1 and 6.2. By excluding this from Section 6.3 an interpretation could be applied to malicious communications more broadly than as was intended.

Likes 0

Dislikes 0

Response

Russell Noble - Cowlitz County PUD - 3

Answer No

Document Name

Comment

See comments as supplied by Deanna Carlson from Cowlitz PUD.

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 Regional Standards Committee

Answer No

Document Name

Comment

The CIP Standards use many terms:

Vendor electronic remote access (proposed CIP-003)

Inbound and outbound electronic access (CIP-003, Section 3)

User-initiated interactive access (CIP-003 Reference Model 5)

Indirect access (CIP-003 Reference Models 6 and 9)

Suggest using an existing term OR request clarification of the “vendor electronic remote access” term - what is the purpose of electronic? What is remote?

Likes 0

Dislikes 0

Response

Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5

Answer

No

Document Name

Comment

The CIP Standards use many terms such as: Vendor electronic remote access (proposed CIP-003), Inbound and outbound electronic access (CIP-003, Section 3), User-initiated interactive access (CIP-003 Reference Model 5), Indirect access (CIP-003 Reference Models 6 and 9). Suggest using an existing term OR request clarification of the “vendor electronic remote access” term - what is the purpose of electronic? What is remote?

Likes 0

Dislikes 0

Response

Benjamin Winslett - Georgia System Operations Corporation - 4

Answer

No

Document Name

Comment

GSOC believes the updated language in section 6, specifically section 6.3 does not clarify the scope of the requirement. The language that provided that clear scoping was removed in this posting. Section 6.3 could now be read to require all malicious communications to be detected, regardless of whether it is vendor communication or not as there is no reference to vendor communication in the control specified in section 6.3. GSOC respectfully proposes the following wording which reverts the language in 6.3 to that of the prior posting:

Vendor Electronic Remote Access Security Controls: For assets containing

low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible

Entity shall implement a process to mitigate risks associated with vendor electronic remote access, where such access has been established under Section 3.1.

These processes shall include:

6.1 One or more method(s) for determining vendor electronic remote

access;

6.2 One or more method(s) for disabling vendor electronic remote

access; and

6.3 One or more method(s) for detecting known or suspected malicious communications for both inbound and outbound vendor communications.

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer

No

Document Name

Comment

Ameren believes the term vendor needs to be more defined more clearly. Does the vendor role make a difference (contractor operators, support, etc.)? Is operations different from support in terms of vendors?

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

The second paragraph of Attachment 1 states "Responsible Entities with multiple-impact BES Cyber Systems ratings can utilize policies, procedures, and processes for their high or medium impact BES Cyber Systems to fulfill the sections for the development of low impact cyber security plan(s)." It is unclear how this statement can be applied without clarification on how the terms used in CIP-005-7 relate to the proposed terms in CIP-003-x. Request clarification on how the CIP-003-X term "vendor electronic remote access" relates to the CIP-005-7 terms "active vendor remote access" (R2) and "vendor-initiated remote connections"(R3).

The CIP Standards use many terms:

- Vendor electronic remote access (proposed CIP-003)
- Inbound and outbound electronic access (CIP-003, Section 3)

- User-initiated interactive access (CIP-003 Reference Model 5)
- Indirect access (CIP-003 Reference Models 6 and 9)

Suggest using an existing term OR request clarification of the “vendor electronic remote access” term - what is the purpose of electronic? What is remote?

Likes 0

Dislikes 0

Response

patricia ireland - DTE Energy - 4, Group Name DTE Energy

Answer No

Document Name

Comment

Please define if “Vendor Electronic Remote Access” is only for Interactive Access or does it include system to system access as well.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Qu?bec Production - 1,5

Answer No

Document Name

Comment

The CIP Standards use many terms:

- {C}· Vendor electronic remote access (proposed CIP-003)
- {C}· Inbound and outbound electronic access (CIP-003, Section 3)
- {C}· User-initiated interactive access (CIP-003 Reference Model 5)
- {C}· Indirect access (CIP-003 Reference Models 6 and 9)

Suggest using an existing term OR request clarification of the “vendor electronic remote access” term - what is the purpose of electronic? What is remote?

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Fong Mua, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Goi, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; - Tim Kelley, Group Name SMUD / BANC

Answer No

Document Name

Comment

SMUD and BANC support Tacoma Power's comment.

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1,5

Answer No

Document Name

Comment

Reclamation recommends adding "Vendor" to the NERC Glossary of Terms and proposes the following definition:

Vendor - Persons, companies, or other organizations with whom the Responsible Entity, or its affiliates, contracts to supply equipment for BES Cyber Systems and related services. Vendor does not include other NERC-registered entities that provide reliability services (e.g., Balancing Authority or Reliability Coordinator services pursuant to NERC Reliability Standards). Vendor may include: (i) developers or manufacturers of information systems, system components, or information system services; (ii) product resellers; or (iii) system integrators.

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer No

Document Name

Comment

While the high-level Section 6 introduction includes scoping language, the wording of the sub-parts 6.1 & 6.2 include the same vendor electronic remote access language, while 6.3 does not. Sub-part 6.3 may be construed to apply more broadly due to the omission of the scoping language in this sub-

part, because the other sub-parts include this scoping language. PGS recommends including the language "vendor remote access".

Likes 0

Dislikes 0

Response

John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; - MEAG Power - 1 - SERC

Answer No

Document Name

Comment

Sections 6.1 and 6.2 use the terms 'vendor electronic remote access'; however, Section 6.3 does not use this language which could lead to confusion for utilities. Even though the high level Section 6 limits the scope to remote access conducted by vendors, Section 6.3, without having the same language as Sections 6.1 and 6.2, could be interpreted to apply to malicious communications more broadly and not just for vendor electronic remote access.

Suggested language: In Section 6.3, instead of saying "One or more method(s) for detecting known or suspected inbound and outbound malicious communications," the suggested language is as follows: "One or more method(s) for addressing and mitigating known or suspected inbound and outbound malicious communications for vendor electronic remote access"

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Nierenberg, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer No

Document Name

Comment

While the high-level Section 6 introduction includes scoping language, the wording of the sub-parts 6.1 and 6.2 include the same vendor electronic remote access language, while 6.3 does not. Sub-part 6.3 may be construed to apply more broadly due to the omission of the scoping language in this sub-part, because the other sub-parts include this scoping language. Tacoma Power recommends including the "vendor remote access" language to the sub-part 6.3 sentence, in accordance with the the following Westlaw reference: [https://content.next.westlaw.com/practical-law/document/lbe943df6e1e711e698dc8b09b4f043e0/Expressio-unius-est-exclusio-alterius?viewType=FullText&transitionType=Default&contextData=\(sc.Default\)&firstPage=true](https://content.next.westlaw.com/practical-law/document/lbe943df6e1e711e698dc8b09b4f043e0/Expressio-unius-est-exclusio-alterius?viewType=FullText&transitionType=Default&contextData=(sc.Default)&firstPage=true)

Likes 2

Platte River Power Authority, 3, Kiess Wade; Public Utility District No. 1 of Snohomish County, 1, Rhoads Alyssia

Dislikes 0

Response	
James Poston - Santee Cooper - 3, Group Name Santee Cooper	
Answer	No
Document Name	
Comment	
The term "vendor" needs to be defined in the NERC glossary of terms. The use of the term "vendor" in the CIP-013 Supplemental Material is not an official definition. This term is crucial to CIP-013 and with the proposed changes to CIP-003 the term will be crucial in determining what is considered vendor remote access.	
Likes	0
Dislikes	0
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	No
Document Name	
Comment	
As mentioned in comments related to Question 1 above, 'vendor electronic remote access' needs clarity of understanding and clear definitions of the terms for appropriate applicability as well as the use of term 'Vendor' e.g., whether a consultant using same infrastructure is considered vendor.	
Likes	0
Dislikes	0
Response	
Kenya Streeter - Edison International - Southern California Edison Company - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
See comments submitted by the Edison Electric Institute	
Likes	0
Dislikes	0

Response	
<p>LaKenya VanNorman - LaKenya VanNorman On Behalf of: Chris Gowder, Florida Municipal Power Agency, 5, 3, 4, 6; Richard Montgomery, Florida Municipal Power Agency, 5, 3, 4, 6; - LaKenya VanNorman, Group Name Florida Municipal Power Agency (FMPA)</p>	
Answer	Yes
Document Name	
Comment	
<p>We appreciate the time and attention the SDT put forth working on this section, however we are concerned that the language under 6.3 does not include a direct reference to “vendor remote access” in the sub part. We understand the SDT debated this issue, however we recommend modification to the language to improve clarity. We believe these clarifications can be made without substantial change, so are thereby voting affirmative with the desire for futher clarification. These are possible improvements to the language:</p> <p>1) Adding clarity to the last sentence of section 6:</p> <p>"These vendor electronic remote access processes shall include:" By adding "vendor electronic remote access", it helps clarify the intent of all three sub-sections being applicable to just "vendor electronic remote access" and not all communications. While technically the word "these" refers to the previous sentence, we feel there could be more calrity to assist Responsisble Entities to focus on the subject of the revisions.</p> <p>2) Remove references to “vendor remote access” in 6.1 and 6.2</p> <p>3) Modifying 6.3 to include a reference to vendor electronic remote access. If 6.3 were modified, we recommend it to read:</p> <p>“6.3 One or more method(s) for detecting known or suspected inbound and outbound malicious communications associated with vendor electronic remote access.”</p>	
Likes	0
Dislikes	0
Response	
<p>Gail Elliott - International Transmission Company Holdings Corporation - NA - Not Applicable - MRO,RF</p>	
Answer	Yes
Document Name	
Comment	
<p>ITC is in agreement with the EEI response</p>	
Likes	0
Dislikes	0
Response	

Kinte Whitehead - Exelon - 3

Answer	Yes
---------------	-----

Document Name	
----------------------	--

Comment

Exelon is aligning with EEl in response to this question.

Likes 0	
---------	--

Dislikes 0	
------------	--

Response

Daniel Gacek - Exelon - 1

Answer	Yes
---------------	-----

Document Name	
----------------------	--

Comment

Exelon is aligning with EEl in response to this question.

Likes 0	
---------	--

Dislikes 0	
------------	--

Response

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

Answer	Yes
---------------	-----

Document Name	
----------------------	--

Comment

EEl supports the Draft 3 language believing that it is sufficiently clear to limit the scope for remote access to low impact BES cyber systems.

Likes 0	
---------	--

Dislikes 0	
------------	--

Response

Dania Colon - Orlando Utilities Commission - 5

Answer	Yes
---------------	-----

Document Name**Comment**

We appreciate the time and attention the SDT put forth working on this section, however we are concerned that the language under 6.3 does not include a direct reference to “vendor remote access” in the sub part. We understand the SDT debated this issue, however we recommend modification to the language to improve clarity. We believe these clarifications can be made without substantial change, so are thereby voting affirmative with the desire for further clarification. These are possible improvements to the language:

1) Adding clarity to the last sentence of section 6:

"These vendor remote access processes shall include:" By adding "vendor remote access", it helps clarify the intent of all three sub-sections being applicable to just "vendor remote access" and not all communications. While technically the word "these" refers to the previous sentence, we feel there could be more clarity to assist Responsible Entities to focus on the subject of the revisions.

2) Remove references to “vendor remote access” in 6.1 and 6.2

3) Modifying 6.3 to include a reference to vendor remote access. If 6.3 were modified, we recommend it to read:

“6.3 One or more method(s) for detecting known or suspected inbound and outbound malicious communications associated with vendor remote access.”

Likes 0

Dislikes 0

Response

Clay Walker - Clay Walker On Behalf of: John Lindsey, Cleco Corporation, 6, 5, 1, 3; Maurice Paulk, Cleco Corporation, 6, 5, 1, 3; Robert Hirschak, Cleco Corporation, 6, 5, 1, 3; - Clay Walker

Answer

Yes

Document Name

Comment

Cleco agrees with EEI comments.

Likes 0

Dislikes 0

Response

Jamie Monette - Allete - Minnesota Power, Inc. - 1

Answer

Yes

Document Name

Comment

Minnesota Power is in agreement with EEI's comments.

Likes 0

Dislikes 0

Response**Mike Magruder - Avista - Avista Corporation - 1**

Answer

Yes

Document Name

Comment

I believe the language is clear however the level of monitoring is not reduced.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer

Yes

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #2.

Likes 0

Dislikes 0

Response**Alison Mackellar - Constellation - 5**

Answer

Yes

Document Name

Comment

Yes, Constellation believes that the language is clear.

Kimberly Turco on behalf of Constellation Segements 5 and 6

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

Yes

Document Name

Comment

Yes, Constellation believes that the language is clear.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Justin Welty - NextEra Energy - Florida Power and Light Co. - 6

Answer

Yes

Document Name

Comment

NextEra Energy supports EEI's comment: EEI supports the Draft 3 language believing that it is sufficiently clear to limit the scope for remote access to low impact BES cyber systems.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Ed Hanson, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer	Yes
Document Name	
Comment	
PG&E agrees the language is clear that remote access is only for vendors.	
Likes 0	
Dislikes 0	
Response	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
I believe the language is clear however the level of monitoring is not reduced.	
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 believes the language added is clear to limit the scop of remote access conducted by vendors.	
Likes 0	
Dislikes 0	
Response	
Joe Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC	
Answer	Yes
Document Name	
Comment	

Xcel Energy supports the comments of EEI and the MRO NSRF.

Likes 0

Dislikes 0

Response

Barry Jones - Barry Jones On Behalf of: sean erickson, Western Area Power Administration, 1, 6; - Barry Jones

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Devon Tremont - Taunton Municipal Lighting Plant - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mark Ciufu - Mark Ciufu On Behalf of: Payam Farahbakhsh, Hydro One Networks, Inc., 3, 1; - Mark Ciufu

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

James Baldwin - Lower Colorado River Authority - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Megan Caulson - Megan Caulson On Behalf of: Jennifer Wright, Sempra - San Diego Gas and Electric, 5, 3, 1; - Megan Caulson

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 6, Group Name ACES Standard Collaborations

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Chris Carnesi - Chris Carnesi On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - Chris Carnesi, Group Name NCPA

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jesus Sammy Alcaraz - Imperial Irrigation District - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amarantos - APS - Arizona Public Service Co. - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

JT Kuehne - AEP - 6

Answer	Yes
---------------	-----

Document Name	
----------------------	--

Comment	
----------------	--

Likes	0
-------	---

Dislikes	0
----------	---

Response	
-----------------	--

Jennifer Buckman - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer	Yes
---------------	-----

Document Name	
----------------------	--

Comment	
----------------	--

Likes	0
-------	---

Dislikes	0
----------	---

Response	
-----------------	--

Ron Wilgers - Black Hills Corporation - 3 - WECC

Answer	Yes
---------------	-----

Document Name	
----------------------	--

Comment	
----------------	--

Likes	0
-------	---

Dislikes	0
----------	---

Response	
-----------------	--

Micah Runner - Black Hills Corporation - 1,3,5,6

Answer	Yes
---------------	-----

Document Name	
----------------------	--

Comment	
----------------	--

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 1,3,5,6

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

Erik Gustafson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC, Texas RE

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Meaghan Connell - Public Utility District No. 1 of Chelan County - 5, Group Name PUD No. 1 of Chelan County	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lan Nguyen - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Martin Sidor - NRG - NRG Energy, Inc. - 6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Steffensen - IDACORP - Idaho Power Company - 1

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Eric Sutlief - CMS Energy - Consumers Energy Company - 3,4,5 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nicholas Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Paul Haase - Paul Haase On Behalf of: Hao Li, Seattle City Light, 4, 5, 3, 6, 1; - Paul Haase, Group Name Seattle City Light

Answer

Document Name

Comment

Seattle City Light abstains

Likes 0

Dislikes 0

Response

Gail Golden - Entergy - Entergy Services, Inc. - 5

Answer

Document Name

Comment

The technical rationale explains that Section 6.3 is specific to vendor only communication. It would aid the reader's understanding if this is clarified in the actual CIP-003-X standard language.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

As noted in its response to Question 1 above, Texas RE continues to believe that the low-impact standards being developed should not be limited solely to vendor communications. However, if the SDT elects to limit the focus of these requirements solely to vendor communications, Texas RE notes that because the SAR specifically states that CIP-003-8 should be revised to include policies for low impact BES Cyber Systems at locations that allow vendor remote access, Texas RE recommends including "at locations that allow vendor remote access" in Section 6 as well.

Likes 0

Dislikes 0

Response

3. Has the SDT clarified that Attachment 1 Section 6 only addresses vendor's access to low impact assets containing BES cyber systems from remote locations? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer No

Document Name

Comment

The use of word "Remote" will need some clarification and perhaps a definition in the defined terms, e.g., how the "Remote" term will be used in the sample scenarios below:

- 1) On site, but electronically remote (i.e. has to go through EAP despite being at the station).
- 2) A "vendor" at the work location of Responsible Entity, also electronically remote (i.e. going through EAP).
- 3) "Traditionally" remote, off site, and electronically remote (also going through EAP).

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 1,3,5,6

Answer No

Document Name

Comment

The language says "electronic remote access" it does not state "remote locations," which is appropriate based on the guidance given for CIP-005, which made it clear that "remote access" may include access originating from a desk in your corporate office. The geographic location of the vendor shouldn't matter, only the method used to access the BCS.

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 1,3,5,6

Answer No

Document Name

Comment

The language says "electronic remote access" it does not state "remote locations," which is appropriate based on the guidance given for CIP-005, which made it clear that "remote access" may include access originating from a desk in your corporate office. The geographic location of the vendor shouldn't

matter, only the method used to access the BCS.

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1,3,5,6

Answer

No

Document Name

Comment

The language says "electronic remote access" it does not state "remote locations," which is appropriate based on the guidance given for CIP-005, which made it clear that "remote access" may include access originating from a desk in your corporate office. The geographic location of the vendor shouldn't matter, only the method used to access the BCS.

Likes 0

Dislikes 0

Response

Ron Wilgers - Black Hills Corporation - 3 - WECC

Answer

No

Document Name

Comment

The language says "electronic remote access" it does not state "remote locations," which is appropriate based on the guidance given for CIP-005, which made it clear that "remote access" may include access originating from a desk in your corporate office. The geographic location of the vendor shouldn't matter, only the method used to access the BCS.

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1,5

Answer

No

Document Name

Comment

Access from remote locations is not the same as remote access. A vendor could be physically on site and connect to the system through a remote connection.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Québec Production - 1,5

Answer

No

Document Name

Comment

Request clarification on why Attachment 1, 6.3 does not use the phrase “vendor electronic remote access” while Section 6 and, 6.1 and 6.2 use this phrase. While in the parent language, we request consistency among 6.1, 6.2 and 6.3.

Request confirmation that the SDT expects all of Attachment 1, Section 3.1 to be in place before Section 6 requirements. If Section 3.1 is not met, then Section 6 does not apply.

Likes 0

Dislikes 0

Response

Benjamin Winslett - Georgia System Operations Corporation - 4

Answer

No

Document Name

Comment

GSOC believes the updated language in section 6, specifically section 6.3 does not specifically limit the scope of the requirement to vendor access and communications. GSOC respectfully proposes the following wording:

Vendor Electronic Remote Access Security Controls: For assets containing

low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible

Entity shall implement a process to mitigate risks associated with vendor electronic remote access, where such access has been established under Section 3.1.

These processes shall include:

6.1 One or more method(s) for determining vendor electronic remote

access;

6.2 One or more method(s) for disabling vendor electronic remote

access; and

6.3 One or more method(s) for detecting known or suspected malicious communications for both inbound and outbound vendor communications.

Likes 0

Dislikes 0

Response

Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5

Answer

No

Document Name

Comment

Request clarification on why Attachment 1, 6.3 does not use the phrase "vendor electronic remote access" while Section 6 and, 6.1 use this phrase. While in the parent language, we request consistency among 6.1, 6.2 and 6.3.

Request confirmation that the SDE expects all of Attachment 1, Section 3.1 to be in place before Section 6 requirements. If section 3.1 is not met, then Section 6 does not apply.

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 Regional Standards Committee

Answer

No

Document Name

Comment

Request clarification on why Attachment 1, 6.3 does not use the phrase "vendor electronic remote access" while Section 6 and, 6.1 and 6.2 use this phrase. While in the parent language, we request consistency among 6.1, 6.2, and 6.3.

Request confirmation that the SDT expects all of Attachment 1, Section 3.1 to be in place before Section 6 requirements. If Section 3.1 is not met, then Section 6 does not apply.

Likes 0

Dislikes 0

Response

Russell Noble - Cowlitz County PUD - 3

Answer No

Document Name

Comment

See comments as supplied by Deanna Carlson from Cowlitz PUD.

Likes 0

Dislikes 0

Response

Deanna Carlson - Cowlitz County PUD - 5

Answer No

Document Name

Comment

The language says, "electronic remote access" it does not state "remote locations," which is appropriate based on the guidance given for CIP-005, which made it clear that "remote access" may include access originating from a desk in your corporate office. The geographic location of the vendor shouldn't matter, only the method used to access the BCS.

Likes 0

Dislikes 0

Response

Sean Steffensen - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

The language in Section 6, 'where such access has been established under Section 3.1' implies the entity is not required to implement a process to 'mitigate risks associated with vendor electronic remote access' unless remote access has been (or will be) established. We believe this is appropriate, where entities have opted to categorically deny all electronic remote access to vendors.

Likes 0

Dislikes 0

Response

Joe Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC

Answer

Yes

Document Name

Comment

Xcel Energy supports the comments of EEI and the MRO NSRF.

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

The language is clear for Section 6.1 and 6.2 that it clarifies this section is specific for Vendor Electronic Remote Access. Section 6.3 could be somewhat ambiguous and may be read to include more than vendor remote access.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Ed Hanson, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer

Yes

Document Name

Comment

PG&E agrees with the modifications to Attachment 1, Section 6 and those modifications clearly indicate it is for vendor access from a remote location.

Likes 0

Dislikes 0

Response

James Poston - Santee Cooper - 3, Group Name Santee Cooper

Answer Yes

Document Name

Comment

The wording in sub-parts 6.1 & 6.2 include the same “vendor electronic remote access” language, while subpart 6.3 does not. Sub-part 6.3 should read the same as sub-parts 6.1 & 6.2 so as not to imply that 6.3 should be more broadly enforced beyond its intended purpose.

Likes 1 Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre

Dislikes 0

Response

Justin Welty - NextEra Energy - Florida Power and Light Co. - 6

Answer Yes

Document Name

Comment

NextEra Energy supports EEI’s comment: EEI agrees that Attachment 1, Section 6 clarifies that vendor’s access to low impact assets containing BES cyber systems is limited to remote locations.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer Yes

Document Name

Comment

Yes. The SDT clarified that Attachment 1 Section 6 only applies to vendor access to low impact assets containing BES cyber systems from remote (off-site) locations.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Alison Mackellar - Constellation - 5

Answer Yes

Document Name

Comment

Yes. The SDT clarified that Attachment 1 Section 6 only applies to vendor access to low impact assets containing BES cyber systems from remote (off-site) locations.

Kimberly Turco on behalf of Constellation Segements 5 and 6

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer Yes

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #3.

Likes 0

Dislikes 0

Response

Jamie Monette - Allele - Minnesota Power, Inc. - 1

Answer Yes

Document Name

Comment

Minnesota Power is in agreement with EEI's comments.

Likes 0

Dislikes 0

Response

Clay Walker - Clay Walker On Behalf of: John Lindsey, Cleco Corporation, 6, 5, 1, 3; Maurice Paulk, Cleco Corporation, 6, 5, 1, 3; Robert Hirschak, Cleco Corporation, 6, 5, 1, 3; - Clay Walker

Answer

Yes

Document Name

Comment

Cleco agrees with EEI comments.

Likes 0

Dislikes 0

Response

Dania Colon - Orlando Utilities Commission - 5

Answer

Yes

Document Name

Comment

See comments under question 2 to help clarify this.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

EEI agrees that Attachment 1, Section 6 clarifies that vendor's access to low impact assets containing BES cyber systems is limited to remote locations.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

Exelon is aligning with EEI in response to this question.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer Yes

Document Name

Comment

Exelon is aligning with EEI in response to this question.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

ITC is in agreement with the EEI response

Likes 0

Dislikes 0

Response

Kenya Streeter - Edison International - Southern California Edison Company - 1,3,5,6

Answer Yes

Document Name

Comment

See comments submitted by the Edison Electric Institute

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nicholas Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Eric Sutlief - CMS Energy - Consumers Energy Company - 3,4,5 - RF

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Martin Sidor - NRG - NRG Energy, Inc. - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Lan Nguyen - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6, Group Name Dominion

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Meaghan Connell - Public Utility District No. 1 of Chelan County - 5, Group Name PUD No. 1 of Chelan County

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Erik Gustafson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC, Texas RE

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	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Nierenberg, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 1	Public Utility District No. 1 of Snohomish County, 1, Rhoads Alyssia
Dislikes 0	

Response

John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; - MEAG Power - 1 - SERC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Buckman - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

JT Kuehne - AEP - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amaranos - APS - Arizona Public Service Co. - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Foung Mua, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Goi, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; - Tim Kelley, Group Name SMUD / BANC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jesus Sammy Alcaraz - Imperial Irrigation District - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Gail Golden - Entergy - Entergy Services, Inc. - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Chris Carnesi - Chris Carnesi On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - Chris Carnesi, Group Name NCPA

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 6, Group Name ACES Standard Collaborations

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

patricia ireland - DTE Energy - 4, Group Name DTE Energy

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

Teresa Krabe - Lower Colorado River Authority - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Megan Caulson - Megan Caulson On Behalf of: Jennifer Wright, Sempra - San Diego Gas and Electric, 5, 3, 1; - Megan Caulson

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

James Baldwin - Lower Colorado River Authority - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mark Ciufu - Mark Ciufu On Behalf of: Payam Farahbakhsh, Hydro One Networks, Inc., 3, 1; - Mark Ciufu

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Devon Tremont - Taunton Municipal Lighting Plant - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Barry Jones - Barry Jones On Behalf of: sean erickson, Western Area Power Administration, 1, 6; - Barry Jones

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaKenya VanNorman - LaKenya VanNorman On Behalf of: Chris Gowder, Florida Municipal Power Agency, 5, 3, 4, 6; Richard Montgomery, Florida Municipal Power Agency, 5, 3, 4, 6; - LaKenya VanNorman, Group Name Florida Municipal Power Agency (FMPA)

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

Paul Haase - Paul Haase On Behalf of: Hao Li, Seattle City Light, 4, 5, 3, 6, 1; - Paul Haase, Group Name Seattle City Light

Answer

Document Name

Comment

Seattle City Light abstains

Likes 0

Dislikes 0

Response

4. The SDT has added clarifying language that limits the scope to Section 3.1. Do you believe the language in Attachment 1 Section 6 limits the scope to low impact BES cyber systems? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Deanna Carlson - Cowlitz County PUD - 5

Answer No

Document Name

Comment

Additional clarification needs to ensure that the scope of Section 6 applies only to low impact BES Cyber Systems where vendors are actually given remote access. The language as written can be interpreted that all low impact BES Cyber System that are identified in Section 3.1 should have a process in place to detect, determine, and disable active vendor electric remote access, and malicious communications, regardless of vendors having remote access or not.

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 Regional Standards Committee

Answer No

Document Name

Comment

Request confirmation that the SDT expects all of Attachment 1, Section 3.1 to be in place before Section 6 requirements. If Section 3.1 is not met, then Section 6 does not apply.

Request clarification on how Sections 3.1 and 6 impact the VSLs.

Likes 0

Dislikes 0

Response

Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5

Answer No

Document Name

Comment

Request confirmation that the SDT expects all of Attachment 1, Section 3.1 to be in place before Section 6 requirements. If Section 3.1 is not met, then Section 6 does not apply. Request clarification on how Sections 3.1 and 6 impacts the VSLs.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Qu?bec Production - 1,5

Answer

No

Document Name

Comment

Request confirmation that the SDT expects all of Attachment 1, Section 3.1 to be in place before Section 6 requirements. If Section 3.1 is not met, then Section 6 does not apply.

Request clarification on how Sections 3.1 and 6 impact the VSLs

Likes 0

Dislikes 0

Response

Chris Carnesi - Chris Carnesi On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - Chris Carnesi, Group Name NCPA

Answer

No

Document Name

Comment

NCPA does not agree with prescriptive language for 6.3 as it relates to detect known or suspected malicious communications. This would be more arduous for Low impact entities to implement compared to non-Control Center Medium Impact facilities as they don't need to comply with CIP-005 R1.5. This creates an imbalance of requiring lower risk facilities to comply with a more strenuous requirement than higher risk facilities. At least limiting 6.3's scope to only Low Impact Control Centers would be somewhat congruent with the CIP-005 R1.5 requirement.

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer	No
Document Name	
Comment	
<p>CIP-005-5 R1.5 does not apply to Medium impact BCS if they are not at Control Centers. Why and how the Requirement in Section 6.3 applies to 'Low Impact BCS' is not very clear from the language used. The Section 6.3 does offer possible mitigation of the risks i.e., 'malicious communication and vendor remote access' however this is even more stringent on Low Impact BCS in comparison to CIP-005-5 R1.5.</p> <p>BC Hydro recommends rewording or removing Section 6.3 completely.</p>	
Likes	0
Dislikes	0
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6, Group Name Dominion	
Answer	No
Document Name	
Comment	
<p>There is confusion with the language used in Section 6 as to whether it pertains to the assets containing the low impact BES Cyber Systems (which may contain out of scope cyber systems) or the low impact BES Cyber Systems themselves.</p>	
Likes	0
Dislikes	0
Response	
Kenya Streeter - Edison International - Southern California Edison Company - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
<p>See comments submitted by the Edison Electric Institute</p>	
Likes	0
Dislikes	0
Response	

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

Answer Yes

Document Name

Comment

ITC is in agreement with the EEI response

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer Yes

Document Name

Comment

Exelon is aligning with EEI in response to this question.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

Exelon is aligning with EEI in response to this question.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name	
Comment	
EEl agrees that the proposed language in Section 6 limits that scope to Section 3.1.	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 6, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
The proposed changes to limit scope are redundant. Section 3.1 and Section 6 are explicit to low impact BCS. If vendor remote access wasn't already established and allowed under Section 3.1, there would either be a violation of Section 3.1 or a CIP exceptional circumstance would need to be declared. The language is fine, but unnecessary to try to confine the scope of Section 6 as it is very explicit to low impact BCS.	
Likes 0	
Dislikes 0	
Response	
Clay Walker - Clay Walker On Behalf of: John Lindsey, Cleco Corporation, 6, 5, 1, 3; Maurice Paulk, Cleco Corporation, 6, 5, 1, 3; Robert Hirschak, Cleco Corporation, 6, 5, 1, 3; - Clay Walker	
Answer	Yes
Document Name	
Comment	
Cleco agrees with EEl comments.	
Likes 0	
Dislikes 0	
Response	
Jamie Monette - Allele - Minnesota Power, Inc. - 1	
Answer	Yes

Document Name

Comment

Minnesota Power is in agreement with EEI's comments.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer

Yes

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #4.

Likes 0

Dislikes 0

Response

Alison Mackellar - Constellation - 5

Answer

Yes

Document Name

Comment

Kimberly Turco on behalf of Constellation Segements 5 and 6

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer	Yes
Document Name	
Comment	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Justin Welty - NextEra Energy - Florida Power and Light Co. - 6	
Answer	Yes
Document Name	
Comment	
NextEra Energy supports EEI's comment: EEI agrees that the proposed language in Section 6 limits that scope to Section 3.1.	
Likes 0	
Dislikes 0	
Response	
Michael Johnson - Michael Johnson On Behalf of: Ed Hanson, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees the modification to Section 3.1 make it clear the scope of the Requirement is for low impact BES Cyber Systems.	
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 agrees the language in Attachment 1 Section 6 limits the scope to low impact BES cyber systems.

Likes 0

Dislikes 0

Response

Joe Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC

Answer Yes

Document Name

Comment

Xcel Energy supports the comments of EEI and the MRO NSRF.

Likes 0

Dislikes 0

Response

Russell Noble - Cowlitz County PUD - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaKenya VanNorman - LaKenya VanNorman On Behalf of: Chris Gowder, Florida Municipal Power Agency, 5, 3, 4, 6; Richard Montgomery, Florida Municipal Power Agency, 5, 3, 4, 6; - LaKenya VanNorman, Group Name Florida Municipal Power Agency (FMPA)

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Barry Jones - Barry Jones On Behalf of: sean erickson, Western Area Power Administration, 1, 6; - Barry Jones

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Devon Tremont - Taunton Municipal Lighting Plant - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mark Ciufu - Mark Ciufu On Behalf of: Payam Farahbakhsh, Hydro One Networks, Inc., 3, 1; - Mark Ciufu

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Benjamin Winslett - Georgia System Operations Corporation - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

James Baldwin - Lower Colorado River Authority - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Megan Caulson - Megan Caulson On Behalf of: Jennifer Wright, Sempra - San Diego Gas and Electric, 5, 3, 1; - Megan Caulson

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 5

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

Dania Colon - Orlando Utilities Commission - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

patricia ireland - DTE Energy - 4, Group Name DTE Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Gail Golden - Entergy - Entergy Services, Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jesus Sammy Alcaraz - Imperial Irrigation District - 1

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Fong Mua, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Goi, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; - Tim Kelley, Group Name SMUD / BANC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1,5	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amarantos - APS - Arizona Public Service Co. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
JT Kuehne - AEP - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennifer Buckman - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; - MEAG Power - 1 - SERC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Nierenberg, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer Yes

Document Name

Comment

Likes 1 Public Utility District No. 1 of Snohomish County, 1, Rhoads Alyssia

Dislikes 0

Response

James Poston - Santee Cooper - 3, Group Name Santee Cooper

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ron Wilgers - Black Hills Corporation - 3 - WECC

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Micah Runner - Black Hills Corporation - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sheila Suurmeier - Black Hills Corporation - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 5

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

Erik Gustafson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC, Texas RE

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Meaghan Connell - Public Utility District No. 1 of Chelan County - 5, Group Name PUD No. 1 of Chelan County

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lan Nguyen - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Martin Sidor - NRG - NRG Energy, Inc. - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Steffensen - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Eric Sutlief - CMS Energy - Consumers Energy Company - 3,4,5 - RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nicholas Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh

Answer Yes

Document Name

Comment	
Likes 0	
Dislikes 0	
Response	
Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Paul Haase - Paul Haase On Behalf of: Hao Li, Seattle City Light, 4, 5, 3, 6, 1; - Paul Haase, Group Name Seattle City Light	
Answer	
Document Name	
Comment	
Seattle City Light abstains	
Likes 0	
Dislikes 0	
Response	

5. The SDT proposes that the modifications in CIP-003-X meet the NERC Board resolution 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.

Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6, Group Name Dominion

Answer No

Document Name

Comment

The scope should be narrowed to just where the risk exists as opposed to a broad swath of assets. The way it is written it implies that all communications need to be monitored to determine malicious communications through vendor remote access.

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer No

Document Name

Comment

Although the cost may differ between entities, BC Hydro's assessment is that the impact may change based on understanding & clarity of terms and scope of application. As advised in comments of Question 1 above, CIP-005-5 R1.5 does not apply to Medium impact BCS if they are not at Control Centers. However requirement in CIP-003-X Section 6.3 applies to 'Low Impact BCS' which is even more stringent on Low Impact BCS in comparison to CIP-005-5 R1.5, where only High and Medium Impact BCS at Control Centers are in scope leaving all the other Medium impact BCS out of scope.

Implementing this requirement and adding detection methods for known or suspected malicious communications for both inbound and outbound communications concerning Low impact BCS will likely have significant cost impact.

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Nierenberg, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer No

Document Name

Comment

Including a more restrictive prescriptive control for malicious communication detection for low impact BCS that does not exist for medium impact BCS not at a Control Center is not a cost-effective approach. Medium impact BCS not at a Control Center must still follow CIP-005 R2 for remote access through an intermediate system. This was mentioned as justification for including Section 6.3 for low impact but not requiring for Medium impact BCS not at a Control Center. If an entity implements CIP-005 R2 Intermediate Systems for low impact, they will still not be compliant with CIP-003, Attachment 1, Section 6.3 as currently worded.

In order to provide a more cost effective solution, Tacoma Power suggests that an entity can mitigate the risks associated with vendor electronic remote access through various means and still address disabling of vendor electric remote access, and malicious communication protection.

Suggested wording to avoid prescriptive language and provide a more cost effective solution:

Section 6: Vendor Electronic Remote Access Security Controls: For assets containing low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible Entity shall implement a process to mitigate risks associated with vendor electronic remote access, where such access has been established under Section 3.1. These processes shall **address:**

*6.1 determining and disabling **active** vendor electronic remote access sessions, **if applicable**; and*

6.2 malicious communications.

Likes 2	Platte River Power Authority, 3, Kiess Wade; Public Utility District No. 1 of Snohomish County, 1, Rhoads Alyssia
---------	---

Dislikes 0	
------------	--

Response

John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; - MEAG Power - 1 - SERC

Answer	No
---------------	----

Document Name	
----------------------	--

Comment

Section 6.3 is written in prescriptive way toward only one of many possible solutions for addressing malicious communications. This does not allow entities to analyze and choose the most cost effective approach to addressing and mitigating malicious communication.

Likes 0	
---------	--

Dislikes 0	
------------	--

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer	No
---------------	----

Document Name	
----------------------	--

Comment

Including a more restrictive prescriptive control for malicious communication detection for low impact BCS that does not exist for medium impact BCS

not at a Control Center is not a cost-effective approach. Medium impact BCS not at a Control Center must still follow CIP-005 R2 for remote access through an intermediate system. This was mentioned as justification for including Section 6.3 for low impact but not requiring for Medium impact BCS not at a Control Center. If an entity implements CIP-005 R2 Intermediate Systems for low impact, they will still not be compliant with CIP-003, Attachment 1, Section 6.3 as currently worded.

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1,5

Answer

No

Document Name

Comment

Reclamation identifies that it is not cost effective to have separate standards for low impact and medium impact BES Cyber Systems, especially when the language of the requirements for each impact level is identical. Reclamation observes that Project 2016-02 will bring many changes to a majority of the CIP standards; therefore, Reclamation recommends Project 2016-02 is a good avenue to incorporate low impact requirements into the CIP standards and avoid the continuous churn of CIP-003 Attachment 1 when ultimately the requirements for low impact BES Cyber Systems will end up being identical to those for medium impact BCS.

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Fong Mua, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Goi, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; - Tim Kelley, Group Name SMUD / BANC

Answer

No

Document Name

Comment

SMUD and BANC support Tacoma Power's comment.

Likes 0

Dislikes 0

Response

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

Answer	No
Document Name	
Comment	
We do not have enough information at this time to address cost-effectiveness of the revisions.	
Likes 0	
Dislikes 0	
Response	
patricia ireland - DTE Energy - 4, Group Name DTE Energy	
Answer	No
Document Name	
Comment	
Cost effectiveness of Attachment 1, 6.1, 6.2, and 6.3 is unknown at this time since the capability will require a technical solution not currently in place. Further, this requirement is not consistent with current CIP-005-6 and future CIP-005-7 enforceable requirements.	
Likes 0	
Dislikes 0	
Response	
Teresa Krabe - Lower Colorado River Authority - 5	
Answer	No
Document Name	
Comment	
There is a high probability that new technology controls will be required to meet the new requirements. Entities would need to allocate funds and projects to implement new technologies.	
Likes 0	
Dislikes 0	
Response	
James Baldwin - Lower Colorado River Authority - 1	
Answer	No

Document Name

Comment

There is a high probability that new technology controls will be required to meet the new requirements. Entities would need to allocate funds and projects to implement new technologies.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer

No

Document Name

Comment

Exelon is aligning with EEI in response to this question.

Likes 0

Dislikes 0

Response

Russell Noble - Cowlitz County PUD - 3

Answer

No

Document Name

Comment

See comments as supplied by Deanna Carlson from Cowlitz PUD.

Likes 0

Dislikes 0

Response

Deanna Carlson - Cowlitz County PUD - 5

Answer

No

Document Name

Comment

The scope should be modified to read more like an objective-based requirement allowing entities more leeway and potentially more cost-effective means to comply with the specific list of assets identified. Recognition that not all communications need to be monitored to determine malicious communications through active vendor remote access will ensure resources are focused on actual risk.

Likes 0

Dislikes 0

Response

Joe Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC

Answer

Yes

Document Name

Comment

Xcel Energy agrees that the modifications can be implemented in a cost-effective manner when implemented within the timeframe identified in the associated Implementation Plan.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Ed Hanson, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer

Yes

Document Name

Comment

Until an approved Standard is in place, PG&E cannot make a determination if the modification are cost effective.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Yes

Document Name

Comment

It is cost effective, but these costs will be pushed directly to ratepayers which requires FERC support to answer the ratepayers.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 1,5

Answer

Yes

Document Name

Comment

We requested redline to last approved. SMEs need to see red lines to the currently effective standard, to adequately review the proposed changes. Without this red line, the review is very challenging and may reduce the chances for approval.

Likes 0

Dislikes 0

Response

Jamie Monette - Allele - Minnesota Power, Inc. - 1

Answer

Yes

Document Name

Comment

Minnesota Power is in agreement with EEI's comments.

Likes 0

Dislikes 0

Response

Kenya Streeter - Edison International - Southern California Edison Company - 1,3,5,6

Answer

Yes

Document Name

Comment

See comments submitted by the Edison Electric Institute

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Eric Sutlief - CMS Energy - Consumers Energy Company - 3,4,5 - RF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Steffensen - IDACORP - Idaho Power Company - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Martin Sidor - NRG - NRG Energy, Inc. - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Meaghan Connell - Public Utility District No. 1 of Chelan County - 5, Group Name PUD No. 1 of Chelan County

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Erik Gustafson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC, Texas RE

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

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

James Poston - Santee Cooper - 3, Group Name Santee Cooper

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Buckman - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

JT Kuehne - AEP - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amaranos - APS - Arizona Public Service Co. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jesus Sammy Alcaraz - Imperial Irrigation District - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Gail Golden - Entergy - Entergy Services, Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Chris Carnesi - Chris Carnesi On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - Chris Carnesi, Group Name NCPA

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Clay Walker - Clay Walker On Behalf of: John Lindsey, Cleco Corporation, 6, 5, 1, 3; Maurice Paulk, Cleco Corporation, 6, 5, 1, 3; Robert Hirschak, Cleco Corporation, 6, 5, 1, 3; - Clay Walker

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 6, Group Name ACES Standard Collaborations

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dania Colon - Orlando Utilities Commission - 5

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

Megan Caulson - Megan Caulson On Behalf of: Jennifer Wright, Sempra - San Diego Gas and Electric, 5, 3, 1; - Megan Caulson

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mark Ciufu - Mark Ciufu On Behalf of: Payam Farahbakhsh, Hydro One Networks, Inc., 3, 1; - Mark Ciufu

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Devon Tremont - Taunton Municipal Lighting Plant - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Barry Jones - Barry Jones On Behalf of: sean erickson, Western Area Power Administration, 1, 6; - Barry Jones

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaKenya VanNorman - LaKenya VanNorman On Behalf of: Chris Gowder, Florida Municipal Power Agency, 5, 3, 4, 6; Richard Montgomery, Florida Municipal Power Agency, 5, 3, 4, 6; - LaKenya VanNorman, Group Name Florida Municipal Power Agency (FMPA)

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nicholas Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh

Answer

Document Name

Comment

NST abstains.

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 1,3,5,6

Answer

Document Name

Comment

We do not have insight to whether this is cost effective or not so Black Hills Corporation will not be providing a comment.

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 1,3,5,6

Answer

Document Name

Comment

We do not have insight to whether this is cost effective or not so Black Hills Corporation will not be providing a comment.

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1,3,5,6

Answer

Document Name

Comment

We do not have insight to whether this is cost effective or not so Black Hills Corporation will not be providing a comment.

Likes 0

Dislikes 0

Response

Ron Wilgers - Black Hills Corporation - 3 - WECC

Answer	
Document Name	
Comment	
We do not have insight to whether this is cost effective or not so Black Hills Corporation will not be providing a comment.	
Likes 0	
Dislikes 0	
Response	
Justin Welty - NextEra Energy - Florida Power and Light Co. - 6	
Answer	
Document Name	
Comment	
NextEra Energy is not supplying a position nor comment on cost effectiveness of these changes.	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 6	
Answer	
Document Name	
Comment	
Constellation will not comment on cost.	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Alison Mackellar - Constellation - 5	

Answer	
Document Name	
Comment	
Constellation will not comment on cost.	
Kimberly Turco on behalf of Constellation Segements 5 and 6	
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	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	
Document Name	
Comment	
Unable to justify cost effectiveness at this time	
Likes 0	
Dislikes 0	
Response	
Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	

Answer	
Document Name	
Comment	
GO/GOPs will need more information to adequately assess the cost-effectiveness of the proposed approach.	
Likes 0	
Dislikes 0	
Response	
Daniel Gacek - Exelon - 1	
Answer	
Document Name	
Comment	
Exelon is aligning with EEI in response to this question.	
Likes 0	
Dislikes 0	
Response	
Gail Elliott - International Transmission Company Holdings Corporation - NA - Not Applicable - MRO,RF	
Answer	
Document Name	
Comment	
ITC is in agreement with the EEI response	
Likes 0	
Dislikes 0	
Response	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5	
Answer	
Document Name	

Comment

Once again, we requested redline to last approved. SMEs need to see red lines to the currently effective standard, to adequately review the proposed changes. Without this red line, the review is very challenging and may reduce the chances for approval.

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 Regional Standards Committee

Answer**Document Name****Comment**

Once again, we requested a redline to the last approved. SMEs need to see red lines to the currently effective standard, to adequately review the proposed changes. Without this red line, the review is very challenging and may reduce the chances of approval.

Otherwise, TFIST abstains from commenting on cost effective.

Likes 0

Dislikes 0

Response

Paul Haase - Paul Haase On Behalf of: Hao Li, Seattle City Light, 4, 5, 3, 6, 1; - Paul Haase, Group Name Seattle City Light

Answer**Document Name****Comment**

Seattle City Light abstains

Likes 0

Dislikes 0

Response

6. The SDT is proposing a 36-month implementation plan for Attachment 1, Section 6 based on industry feedback. Would these proposed timeframes give enough time to put into place process, procedures or technology to meet the proposed language in Section 6? If you think an alternate timeframe is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.

patricia ireland - DTE Energy - 4, Group Name DTE Energy

Answer No

Document Name

Comment

It is difficult to estimate as the scope of 6.3 is not clear yet.

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10

Answer No

Document Name

Comment

While WECC does not believe the extended 36-month Implementation Plan is reason to vote NO, we believe that considering the risks that are facing the system, the DT should consider moving the Implementation back to 24 months as was included in earlier versions of the draft standard. However, if a 36-month Implementation Plan is what is necessary to gain approval of the Standard, WECC understands.

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer No

Document Name

Comment

BC Hydro recommends a longer implementation plan, e.g. more than ~36 months, considering the cost and scope impact as identified in comments to Question 1 and 4 above. Once the clarity of terms and definitions is obtained as identified in comments to Question 1 and 4, BC Hydro will be in a better position to provide an alternate detailed implementation plan to meet the target completion deadline.

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6, Group Name Dominion

Answer No

Document Name

Comment

Large entities with hundreds of low impact facilities will need more implementation time for addressing the changes applicable to low impact assets. Suggested timeline is a 5 year plan, implementing 20% of the assets per year.

Likes 0

Dislikes 0

Response

Kenya Streeter - Edison International - Southern California Edison Company - 1,3,5,6

Answer Yes

Document Name

Comment

See comments submitted by the Edison Electric Institute

Likes 0

Dislikes 0

Response

Deanna Carlson - Cowlitz County PUD - 5

Answer Yes

Document Name

Comment

Cowlitz PUD, Segment 5 8/19/2022

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 Regional Standards Committee	
Answer	Yes
Document Name	
Comment	
We agree with 36 months.	
Request deletion of the following language because this language refers to a removed Section – “Where the standard drafting team identified the need for a longer implementation period for compliance with a particular section of a proposed Reliability Standard (i.e., an entire Requirement or a portion thereof), the additional time for compliance with that section is specified below. The phased-in compliance date for that particular section represents the date that Responsible Entities must begin to comply with that particular section of the Reliability Standard, even where the Reliability Standard goes into effect at an earlier date.”	
Likes	0
Dislikes	0
Response	
Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5	
Answer	Yes
Document Name	
Comment	
Agree with 36-months. Request deletion of the following language because this language refers to a removed Section - "Where the standard drafting team identified the need for a longer implementation period for compliance with a particular section of a proposed Reliability Standard (i.e., and entire Requirement or a portion thereof), the additional time for compliance with that section is specified below. The phased-in compliance date for that particular section represents the date that Responsible Entities must begin to comply with that particular section of the Reliability Standard, even where the Reliability Standard does into effect at an earlier date."	
Likes	0
Dislikes	0
Response	
Gail Elliott - International Transmission Company Holdings Corporation - NA - Not Applicable - MRO,RF	
Answer	Yes
Document Name	
Comment	

ITC is in agreement with the EEI response

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer

Yes

Document Name

Comment

Exelon is aligning with EEI in response to this question.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer

Yes

Document Name

Comment

Exelon is aligning with EEI in response to this question.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

EEI supports the proposed 36-month implantation plan for attachment 1, Section 6.

Likes 0

Dislikes 0

Response

Clay Walker - Clay Walker On Behalf of: John Lindsey, Cleco Corporation, 6, 5, 1, 3; Maurice Paulk, Cleco Corporation, 6, 5, 1, 3; Robert Hirschak, Cleco Corporation, 6, 5, 1, 3; - Clay Walker

Answer Yes

Document Name

Comment

Cleco agrees with EEI comments.

Likes 0

Dislikes 0

Response

Jamie Monette - Allete - Minnesota Power, Inc. - 1

Answer Yes

Document Name

Comment

Minnesota Power is in agreement with EEI's comments.

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 thanks the Standard Drafting Team for this important revision. We fully support the proposed implementation timeline.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer Yes

Document Name

Comment

The NAGF supports the SDT's proposed implementation timeframe recommendation.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 1,5

Answer Yes

Document Name

Comment

We agree with 36-months.

Request deletion of the following language because this language refers to a removed Section – “Where the standard drafting team identified the need for a longer implementation period for compliance with a particular section of a proposed Reliability Standard (i.e., an entire Requirement or a portion thereof), the additional time for compliance with that section is specified below. The phased-in compliance date for that particular section represents the date that Responsible Entities must begin to comply with that particular section of the Reliability Standard, even where the Reliability Standard goes into effect at an earlier date.”

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer Yes

Document Name

Comment

Increasing the implementation time from 18 to 36 months should allow adequate time for implementation.

Likes 0

Dislikes 0

Response

Gail Golden - Entergy - Entergy Services, Inc. - 5

Answer

Yes

Document Name

Comment

Risk: Supply chain risk to be taken into factor.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer

Yes

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #6.

Likes 0

Dislikes 0

Response

Alison Mackellar - Constellation - 5

Answer

Yes

Document Name

Comment

Yes. The proposed 36 months would give enough time to put the process, procedures and technology in place to meet the proposed language in Section 6.

Kimberly Turco on behalf of Constellation Segements 5 and 6

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer Yes

Document Name

Comment

Yes. The proposed 36 months would give enough time to put the process, procedures and technology in place to meet the proposed language in Section 6.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Justin Welty - NextEra Energy - Florida Power and Light Co. - 6

Answer Yes

Document Name

Comment

NextEra Energy supports EEI's comment: EEI supports the proposed 36-month implantation plan for attachment 1, Section 6.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Ed Hanson, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer Yes

Document Name

Comment

PG&E agrees with the 36-month implementation plan and that it would be sufficient time for PG&E to implement the proposed modifications.

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 5

Answer

Yes

Document Name

Comment

Increasing the implementation time from 18 to 36 months should allow adequate time for implementation.

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 agrees and supports the proposed 36-month implementation plan.

Likes 0

Dislikes 0

Response

Joe Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC

Answer

Yes

Document Name

Comment

Xcel Energy supports the comments of EEI and the MRO NSRF.

Likes 0

Dislikes 0

Response

Lan Nguyen - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer

Yes

Document Name

Comment

CenterPoint Energy Houston Electric, LLC (CEHE) supports the 36 calendar month implementation.

Likes 0

Dislikes 0

Response

Russell Noble - Cowlitz County PUD - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaKenya VanNorman - LaKenya VanNorman On Behalf of: Chris Gowder, Florida Municipal Power Agency, 5, 3, 4, 6; Richard Montgomery, Florida Municipal Power Agency, 5, 3, 4, 6; - LaKenya VanNorman, Group Name Florida Municipal Power Agency (FMPA)

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Barry Jones - Barry Jones On Behalf of: sean erickson, Western Area Power Administration, 1, 6; - Barry Jones

Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Devon Tremont - Taunton Municipal Lighting Plant - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Mark Ciufu - Mark Ciufu On Behalf of: Payam Farahbakhsh, Hydro One Networks, Inc., 3, 1; - Mark Ciufu	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
James Baldwin - Lower Colorado River Authority - 1	
Answer	Yes
Document Name	
Comment	
Likes	0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Megan Caulson - Megan Caulson On Behalf of: Jennifer Wright, Sempra - San Diego Gas and Electric, 5, 3, 1; - Megan Caulson

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 5

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	
Dania Colon - Orlando Utilities Commission - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 6, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Chris Carnesi - Chris Carnesi On Behalf of: Dennis Sismaet, Northern California Power Agency, 4, 6, 3, 5; Jeremy Lawson, Northern California Power Agency, 4, 6, 3, 5; Marty Hostler, Northern California Power Agency, 4, 6, 3, 5; Michael Whitney, Northern California Power Agency, 4, 6, 3, 5; - Chris Carnesi, Group Name NCPA	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Fong Mua, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Goi, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; - Tim Kelley, Group Name SMUD / BANC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Michelle Amarantos - APS - Arizona Public Service Co. - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

JT Kuehne - AEP - 6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Buckman - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; - MEAG Power - 1 - SERC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Nierenberg, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 1	Public Utility District No. 1 of Snohomish County, 1, Rhoads Alyssia
Dislikes 0	
Response	
James Poston - Santee Cooper - 3, Group Name Santee Cooper	
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

Erik Gustafson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC, Texas RE

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Meaghan Connell - Public Utility District No. 1 of Chelan County - 5, Group Name PUD No. 1 of Chelan County

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Martin Sidor - NRG - NRG Energy, Inc. - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Eric Sutlief - CMS Energy - Consumers Energy Company - 3,4,5 - RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nicholas Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Paul Haase - Paul Haase On Behalf of: Hao Li, Seattle City Light, 4, 5, 3, 6, 1; - Paul Haase, Group Name Seattle City Light

Answer

Document Name

Comment

Seattle City Light abstains

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

Ron Wilgers - Black Hills Corporation - 3 - WECC

Answer

Document Name

Comment

We do not have insight to whether this is cost effective or not so Black Hills Corporation will not be providing a comment.

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1,3,5,6

Answer

Document Name

Comment

We do not have insight to whether this is cost effective or not so Black Hills Corporation will not be providing a comment.

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 1,3,5,6

Answer

Document Name

Comment

We do not have insight to whether this is cost effective or not so Black Hills Corporation will not be providing a comment.

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 1,3,5,6

Answer

Document Name

Comment

We do not have insight to whether this is cost effective or not so Black Hills Corporation will not be providing a comment.

Likes 0

Dislikes 0

Response

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

Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nicholas Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh

Answer

Document Name

Comment

NST believes redline versions of-proposed Standards should be markups to "last approved," not markups to previous proposed versions. The practice of redlining previous drafts makes it difficult to compare proposed new or modified requirement language to current, in-effect requirements.

NST believes the SDT should, in addition to addressing the NERC Board resolution, revise CIP-003 Requirement R2 to state that documented cyber security plan(s) for a Responsible Entity's low impact BES Cyber Systems are required to address Attachment 1 Sections 3, 5, and 6 only if the following conditions exist:

For Section 3, only if one or more of the Responsible Entity's assets that contain low impact BCS has external connectivity of a type that matches the descriptions in Sections 3.1 and/or 3.2.

For Section 5, only if TCAs and RMs are used at one or more of the Responsible Entity's assets that contain low impact BCS and are occasionally connected to BCS.

For Section 6, only if (a) Section 3.1 is applicable and (b) vendor remote access is permitted.

A Responsible Entity with no vendor remote access should not be expected to document how it addresses Section 6 requirements.

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1

Answer

Document Name

Comment

We appreciate the time and level of effort that the Drafting Team has put in to address the many concerns related to vendor access to Low Impact Cyber Systems. Their efforts will eventually result in modifications to CIP-003 that will benefit the industry, protect the Bulk Electric System, and better serve the ratepayers.

Likes 0

Dislikes 0

Response

Lan Nguyen - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer

Document Name

Comment

CEHE recommends the following revisions be made to the CIP-003-X Technical Rationale document for clarity:

1. Define the acronym "SAR" as "Standard Authorization Request" and
2. On page 5, under "1. Electronic remote access:", add a statement to clarify that "electronic remote access" includes interactive and system-to-system remote access.

Likes 0

Dislikes 0

Response

Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO

Answer

Document Name

Comment

Attachment 1, Section 6, sub-section 3. The wording is good but can further be clarified by adding "for vendor electronic remote access" to the end:
One or more method(s) for detecting known or suspected inbound and outbound malicious communications **for vendor electronic remote access**.

Attachment 2, Section 6, sub-section 3. (examples of evidence) the wording is good but can further be clarified:

- Network based Anti-malware technologies such as deep packet inspection;
- Intrusion Detection System (IDS)/Intrusion Prevention System (IPS); or
- Automated or manual log reviews; or
- Automated User Behaviour Analytics (UBA); or
- SIEM network traffic or vendor remote access log analysis and alerting; or
- other operational, procedural, or technical controls.

Likes 0

Dislikes 0

Response

Joe Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC

Answer

Document Name

Comment

Xcel Energy supports the comments of EEI and the MRO NSRF.

Likes 0

Dislikes 0

Response

Meaghan Connell - Public Utility District No. 1 of Chelan County - 5, Group Name PUD No. 1 of Chelan County

Answer

Document Name

Comment

In the Consideration of Comments document for the Draft 2 ballot, the SDT states that "...the SDT believes "remote access" is any access that crosses this boundary (Attachment 1 Section 3.1). If a vendor is "onsite" but starts the connection process outside this boundary, this connection should be considered remote access." CHPD believes that by including this statement in the Technical Rational document it will provide stakeholders and the ERO Enterprise with a better understanding of the requirements in the CIP-003-XReliability Standard.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Consider updating Section 6.3 to be more clear in identifying the language is specifically geared towards Vendor Electronic Remote Access **only**.

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer

Document Name

Comment

BC Hydro acknowledges the SDT's effort and hard work which went into putting together these complex changes to CIP-003-X. As identified in comments of question 1 to 4 above, the definitions of terms and clarity of application with some specific industry use case examples will help providing a more clear understanding and likely result in a faster and appropriate approvals of these proposed changes.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Ed Hanson, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer

Document Name

Comment

PG&E wishes to thank the SDT for listening to the industry's input and the effort in making these modifications to address the NERC Boards resolution

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 1,3,5,6

Answer

Document Name

Comment

n/a

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 1,3,5,6

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1,3,5,6

Answer

Document Name

Comment

NA

Likes 0

Dislikes 0

Response

Ron Wilgers - Black Hills Corporation - 3 - WECC

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Justin Welty - NextEra Energy - Florida Power and Light Co. - 6

Answer

Document Name

Comment

NextEra Energy thanks the SDT for its service of improving the security of the bulk electric system.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

Document Name

Comment

Constellation does not have any additional comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Alison Mackellar - Constellation - 5

Answer

Document Name

Comment

Constellation does not have additional comments.

Kimberly Turco on behalf of Constellation Segements 5 and 6

Likes 0

Dislikes 0

Response

John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; - MEAG Power - 1 - SERC

Answer

Document Name

Comment

Even though Attachment 1, Section 6 addresses the risk of malicious communication, it does so in a prescriptive way in that the standard is directing utilities toward a particular solution (e.g. detecting with software/hardware or detection processes) rather than allowing the utility to choose the best approach/method to address and mitigate malicious communication.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

In Attachment 1, Section 6, Texas RE recommends specifying “pursuant to CIP-002” rather than referencing another NERC Reliability Standard, as requirements should be complete and self-contained as noted in the Ten Benchmarks of an Excellent Reliability Standard. Texas RE recommends the following language: “For each asset that contains a low impact BES Cyber System, and for which the Responsible Entity allows vendor remote access, the Responsible Entity shall implement a process to mitigate risks associated with vendor electronic remote access.”

Additionally, Texas RE recommends the SDT Include language for (1) software integrity and authenticity, (2) information system planning, and (3) vendor risk and procurement controls, which addresses various aspects of supply chain risk management as is consistent with Reliability Standards CIP-013 and CIP-010.

Likes 0

Dislikes 0

Response

JT Kuehne - AEP - 6

Answer

Document Name

Comment

No additional comments at this time. AEP thanks the SDT for their efforts on this draft.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1,5

Answer

Document Name

Comment

Reclamation appreciates the SDT's efforts to incorporate the NIST Framework into the NERC Standards. Reclamation encourages the SDT to continue this practice to ensure that NERC standards do not duplicate requirements contained within the NIST Framework.

Likes 0

Dislikes 0

Response

Joseph Amato - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3

Answer

Document Name**Comment**

BHE requests the words “and timeframes [keep the “to”] authorize,” be removed from the Technical Rationale, page 5: “The language allows entities to define how and where vendor electronic remote access occurs and the ideal methods and timeframes to authorize, establish, and disable vendor electronic remote access.” BHE is concerned this reference to timeframes and authorization could lead Regional Entities to question both, when neither appear in the 6.1 obligation to determine access.

BHE also recommends for Attachment 2, Section 6.3, to lowercase “Intrusion Detection System/Intrusion Prevention System” since it’s not a glossary term and not a formal name.

Thanks to the SDT for the fine work on this standard.

Likes 0

Dislikes 0

Response**Jesus Sammy Alcaraz - Imperial Irrigation District - 1****Answer****Document Name****Comment**

With the consideration of the FERC NOPR. Additional architecture diagrams should be illustrated for a possible IDS/IPS implementation similar to when EAC under section 3, there was guidance architecture diagrams.

Likes 0

Dislikes 0

Response**Steven Rueckert - Western Electricity Coordinating Council - 10****Answer****Document Name****Comment**

None. Thank you for the opportunity to comment.

Likes 0

Dislikes 0

Response

Gail Golden - Entergy - Entergy Services, Inc. - 5

Answer

Document Name

Comment

Is the intent of this section to not include dial-up? If so, it would be better to clarify in the language.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Qu?bec Production - 1,5

Answer

Document Name

Comment

we requested redline to last approved. SMEs need to see red lines to the currently effective standard, to adequately review the proposed changes. Without this red line, the review is very challenging and may reduce the chances for approval.

Request consistency the Attachment 1 Section 6 terms. The current language requires a plan, a process, processes, and methods but evaluates compliance based on security controls. 1) CIP-003 R2 states "shall implement one or more documented cyber security plan(s)"; 2) Attachment 1 Section 6 first says "shall implement a process" and then says "These processes shall include"; 3) Section 6.1 – 6.3 each require "One or more methods"; and 4) The VSL for R2 states: "but failed to implement vendor electronic remote access security controls according to Requirement R2, Attachment 1, Section 6."

Recommend consistency between Attachment 1, Section 6 and other Attachment 1 Sections by changing "process" to "plan." Suggest changing from "For assets containing low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible Entity shall implement a process to mitigate risks associated with electronic vendor electronic remote access, where such access has been established under Section 3.1. These processes shall include:" to "For assets containing low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible Entity shall implement one of more plans to mitigate risks associated with electronic vendor electronic remote access, where such access has been established under Section 3.1. These plans shall include:"

Request clarification on how a new Low Impact Requirement can be a higher bar than the corresponding High / Medium Impact Requirements. The equivalent requirement to Section 6.3, for high and medium impact, is CIP-005-7 R1.5 which is only applicable to high impact BCS and medium impact BCS at a Control Center. The existing 6.3 would require a low impact control that is not required for medium impact that is not at a Control Center.

Request clarification on Attachment 1 Section 6.3. Why a Low Requirement has a larger scope than the corresponding Medium Requirement (CIP-005 R1.6) The proposed Requirement for CIP-005 R1.6 says "detecting known or suspected malicious Internet Protocol (IP) communications entering or

leaving an ESP.” 6.3 says “One or more method(s) for detecting known or suspected inbound and outbound malicious communications.” 6.3 applies to all vendor communications, not just IP. Next CIP-005 R1.6’s Applicable Systems says “Medium impact BCS at Control Centers” 6.3 applies to all vendor communications, not just Control Centers.

Request clarification on why Attachment 1, 6.3 does not use the phrase “vendor electronic remote access” while Section 6 and, 6.1 and 6.2 use this phrase. While in the parent language, we request consistency among 6.1, 6.2 and 6.3.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

Document Name

Comment

The NAGF requests the SDT to consider adding language in Attachment 2 Section 6.3 to clarify that documentation of vendor contractual agreements to maintain malicious communication security controls would be an appropriate approach to meet compliance with Attachment 1 Section 6.3.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Like NAGF, Duke Energy asks the Standard Drafting Team to consider adding language in Attachment 2 Section 6 Part 3 to explicitly clarify that documentation of vendor contractual agreements to maintain malicious communication security controls could be an approach to comply with Attachment 1 Section 6.3. Without this addition, compliance with the revisions could be challenging for OEM connections, given that many vendors consider their communications with covered equipment to be propriety information or intellectual property that they are not willing to have inspected.

We also recommend that the Drafting Team reconsider the one example in Attachment 2 Section 6 Part 3 where it says “anti-malware technologies e.g. full packet inspection.” We would either like to see the one example taken away, or more added, since one example could imply one best option.

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 6, Group Name ACES Standard Collaborations

Answer

Document Name

Comment

We would like to thank the SDT for their efforts and allowing the industry to participate in the drafting process

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Section 6 states “the Responsible Entity shall implement a process“while CIP-003-XR2, for which Section 6 is dependent, requires the implementation of a plan. The second paragraph in Attachment 1 states “Responsible Entities with multiple-impact BES Cyber Systems ratings can utilize policies, procedures, and processes for their high or medium impact BES Cyber Systems to fulfill the sections for the development of low impact cyber security plan(s).” Additionally, Attachment 2, Section 6 states “For Section 6.3, documentation showing implementation of processes or technologies”. The VSL related to Section 6 only references a “plan”. Suggest removing the requirement to use a “process” from Attachment 1 section 6. Additionally, suggest that the language of Attachment 1 Section 6 and Attachment 2 section 6 and the VSLs be consistent.

The Technical Rational document, page 6, par. 3 states “The objective of Attachment 1 Section 6.1 is for entities to determine vendor electronic remote access to their low impact BES Asset(s) and/or BES Cyber Systems.” Request that the “their low impact BES Asset(s) and/or” be struck. The inclusion of these words brings non-BCS into scope.

Likes 0

Dislikes 0

Response

Jose Avendano Mora - Edison International - Southern California Edison Company - 1

Answer

Document Name

Comment

See comments submitted by the Edison Electric Institute

Likes 0

Dislikes 0

Response

Romel Aquino - Edison International - Southern California Edison Company - 3

Answer

Document Name

Comment

See comments submitted by the Edison Electric Institute

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer

Document Name

Comment

Ameren would like more clarification on what is considered malicious activity. In Attachment 1 Section 6, Ameren believes that 6.2 and 6.3 should be switched because the determination to disable the vendor's access would be made after suspicious communication has been detected.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer

Document Name

Comment

Exelon is aligning with EEI in response to this question.

Likes 0

Dislikes 0

Response

Mark Ciufu - Mark Ciufu On Behalf of: Payam Farahbakhsh, Hydro One Networks, Inc., 3, 1; - Mark Ciufu

Answer

Document Name

Comment

Suggest to restrict to scope of section 6.3 to Asset contacting a Low Impact BCS at a control center or remove the section 6.3 sub requirement entirely. The rationale is the low impact BCS should not have a higher requirement than medium impact. Alternatively, include the detection of known/suspected inbound and outbound malicious communication requirement in Medium Impact BCS that is not control center, since the justification of using Intermediate system and multifactor authentication (CIP-005 IRA requirements) as a risk mitigation does not cover system to system communications from/to vendors.

Likes 0

Dislikes 0

Response

Michael Russell - Massachusetts Municipal Wholesale Electric Company - 5

Answer

Document Name

Comment

Once again, we requested redline to last approved. SMEs need to see red lines to the currently effective standard, to adequately review the proposed changes. Without this red line, the review is very challenging and may reduce the chances for approval.

Request consistency the Attachment 1 Section 6 terms. The current language requires a plan, a process, processes, and methods but evaluates compliance based on security controls. 1) CIP-003 R2 states "shall implement one or more documented cyber security plan(s)"; 2) Attachment 1 Section 6 first says "shall implement a process" and then says "These processes shall include"; 3) Section 6.1 – 6.3 each require "One or more methods"; and 4) The VSL for R2 states: "but failed to implement vendor electronic remote access security controls according to Requirement R2, Attachment 1, Section 6."

Recommend consistency between Attachment 1, Section 6 and other Attachment 1 Sections by changing "process" to "plan." Suggest changing from "For assets containing low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible Entity shall implement a process to mitigate risks associated with electronic vendor electronic remote access, where such access has been established under Section 3.1. These processes shall include:" to "For assets containing low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible Entity shall implement one of more plans to mitigate risks associated with electronic vendor electronic remote access, where such access has been established under Section 3.1. These plans shall include:"

Request clarification on how a new Low Impact Requirement can be a higher bar than the corresponding High / Medium Impact Requirements. The

equivalent requirement to Section 6.3, for high and medium impact, is CIP-005-7 R1.5 which is only applicable to high impact BCS and medium impact BCS at a Control Center. The existing 6.3 would require a low impact control that is not required for medium impact that is not at a Control Center.

Request clarification on Attachment 1 Section 6.3. Why a Low Requirement has a larger scope than the corresponding Medium Requirement (CIP-005 R1.6) The proposed Requirement for CIP-005 R1.6 says “detecting known or suspected malicious Internet Protocol (IP) communications entering or leaving an ESP.” 6.3 says “One or more method(s) for detecting known or suspected inbound and outbound malicious communications.” 6.3 applies to all vendor communications, not just IP. Next CIP-005 R1.6’s Applicable Systems says “Medium impact BCS at Control Centers” 6.3 applies to all vendor communications, not just Control Centers.

Request clarification on why Attachment 1, 6.3 does not use the phrase “vendor electronic remote access” while Section 6 and, 6.1 and 6.2 use this phrase. While in the parent language, we request consistency among 6.1, 6.2 and 6.3.

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 Regional Standards Committee

Answer

Document Name

Comment

Once again, we requested a redline to last approved. SMEs need to see red lines to the currently effective standard, to adequately review the proposed changes. Without this red line, the review is very challenging and may reduce the chances for approval.

Request consistency in the Attachment 1 Section 6 terms. The current language requires a plan, a process, processes, and methods but evaluates compliance based on security controls. 1) CIP-003 R2 states “shall implement one or more documented cyber security plan(s)”; 2) Attachment 1 Section 6 first says “shall implement a process” and then says “These processes shall include”; 3) Section 6.1 – 6.3 each require “One or more methods”; and 4) The VSL for R2 states: “but failed to implement vendor electronic remote access security controls according to Requirement R2, Attachment 1, Section 6.”

Recommend consistency between Attachment 1, Section 6, and other Attachment 1 Sections by changing “process” to “plan.” Suggest changing from “For assets containing low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible Entity shall implement a process to mitigate risks associated with electronic vendor electronic remote access, where such access has been established under Section 3.1. These processes shall include:” to “For assets containing low impact BES Cyber System(s) identified pursuant to CIP-002, the Responsible Entity shall implement one or more plans to mitigate risks associated with electronic vendor electronic remote access, where such access has been established under Section 3.1. These plans shall include:”

Request clarification on how a new Low Impact Requirement can be a higher bar than the corresponding High / Medium Impact Requirements. The equivalent requirement to Section 6.3, for high and medium impact, is CIP-005-7 R1.5 which is only applicable to high impact BCS and medium impact

BCS at a Control Center. The existing 6.3 would require a low impact control that is not required for the medium impact that is not at a Control Center.

Request clarification on Attachment 1 Section 6.3. Why a Low Requirement has a larger scope than the corresponding Medium Requirement (CIP-005 R1.6) The proposed Requirement for CIP-005 R1.6 says “detecting known or suspected malicious Internet Protocol (IP) communications entering or leaving an ESP.” 6.3 says “One or more method(s) for detecting known or suspected inbound and outbound malicious communications.” 6.3 applies to all vendor communications, not just IP. Next CIP-005 R1.6’s Applicable Systems says “Medium impact BCS at Control Centers” 6.3 applies to all vendor communications, not just Control Centers.

Request clarification on why Attachment 1, 6.3 does not use the phrase “vendor electronic remote access” while Section 6 and, 6.1 and 6.2 use this phrase. While in the parent language, we request consistency among 6.1, 6.2, and 6.3.

Likes 0

Dislikes 0

Response

Paul Haase - Paul Haase On Behalf of: Hao Li, Seattle City Light, 4, 5, 3, 6, 1; - Paul Haase, Group Name Seattle City Light

Answer

Document Name

Comment

Seattle City Light abstains

Likes 0

Dislikes 0

Response

Russell Noble - Cowlitz County PUD - 3

Answer

Document Name

Comment

See comments as supplied by Deanna Carlson from Cowlitz PUD.

Likes 0

Dislikes 0

Response

Deanna Carlson - Cowlitz County PUD - 5

Answer

Document Name

Comment

There should be additional clarification on Attachment 1 Section 6.3. It appears that Low Requirement has a larger scope than the corresponding Medium Requirement. As written, Section 6.3 applies to all vendor communications.

Likes 0

Dislikes 0

Response

Kenya Streeter - Edison International - Southern California Edison Company - 1,3,5,6

Answer

Document Name

Comment

See comments submitted by the Edison Electric Institute

Likes 0

Dislikes 0

Response