Unofficial Comment Form

Project 2023-06 CIP-014 Risk Assessment Refinement

**Be aware that this is a public proceeding, and comments are publicly available upon submission.  DO NOT include any CEII or otherwise sensitive information in your comments.**

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Project** **2023-06 Risk Assessment Refinement** by **8 p.m. Eastern, Wednesday, November 6, 2024.**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project_2023-06_CIP-014_Risk_Assessment_Refinement.aspx). If you have questions, contact Senior Standards Developer, [Ben Wu](mailto:ben.wu@nerc.net) (via email), or at 470-542-6882.

## Background Information

Due to an increase in reports of physical attacks on electric substations, the Federal Energy Regulatory Commission (FERC) issued the December 2022 Order in Docket No. RD23-2-000 directing NERC to evaluate the effectiveness of the Physical Security Reliability Standard CIP-014-3 in mitigating the risks to the Bulk-Power System (BPS) associated with physical attacks. In the [report](https://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/NERC%20Report%20on%20CIP-014-3.pdf) filed in response to a FERC directive, NERC staff identified continuing inconsistency in registered entity CIP-014-3 risk assessments to most appropriately identify critical infrastructure. FERC directed NERC to evaluate whether the physical security protection requirements in NERC's Reliability Standards are adequate to address the risks associated with physical attacks on BPS Facilities, including the adequacy of the required risk assessment in CIP-014-3 Requirement R1. In the [report](https://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/NERC%20Report%20on%20CIP-014-3.pdf), NERC found that CIP-014-3 required revision to assure adequate and consistent approach in evaluating instability as well as the identification of infrastructure critical to the operation of the BPS.

## Questions

1. Do you agree with the modifications made in CIP-014-4 with modified Requirement R1 to address the issues identified in the SAR?

Yes

No

Comments:

1. Do you agree with the modifications made in CIP-014-4 with new Requirement R2 to address the issues identified in the SAR?

Yes

No

Comments:

1. Do you agree with the modifications made in CIP-014-4 with new Requirement R3 to address the issues identified in the SAR?

Yes

No

Comments:

1. Do you agree with the modifications made in CIP-014-4 with new Requirement R4 to address the issues identified in the SAR?

Yes

No

Comments:

1. Do you agree with the modifications made in CIP-014-4 with adding Requirement R5 to address the issues identified in the SAR?

Yes

No

Comments:

1. Do you agree with the Implementation Plan for CIP-014-4?

Yes

No

Comments:

1. Do you agree that CIP-014-4 is cost effective to address the reliability issue of physical security? If no, why not?

Yes

No

Comments:

1. Provide any additional comments for the standard drafting team to consider, if desired.

Comments: