

# Consideration of Comments

## Project 2014-04 Physical Security

The Physical Security Drafting Team thanks all commenters who submitted comments on the Standard Authorization Request (SAR). The SAR was posted for a 30-day public comment period from December 15, 2014 through January 13, 2015. Stakeholders were asked to provide feedback on the SAR through a special electronic comment form. There were 17 sets of comments, including comments from approximately 59 different people from approximately 58 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

All comments submitted may be reviewed in their original format on the standard's [project page](#).

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Director of Standards, [Valerie Agnew](#) via email, or by telephone at (404) 446-2566. In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

Summary Consideration: All those submitting comments agreed with the proposed revisions to the SAR. Several comments suggested that the drafting team consider making revisions to the standard in addition to simply removing the term "widespread" from the standard. These comments suggest modifying CIP-014-1 to make clear that a facility that has a critical impact on the operation of an Interconnection is critical and therefore subject to Requirement R1. Another comment suggested that any clarification made to the CIP-014 Standard should be consistent with current applicable standards; for example in the TPL-001-4 standard Requirement R6 requires the Transmission Planner and Planning Coordinator to define their criteria or methodology used in the analysis for the identification of System instability. These comments will be forwarded to the PSSDT for their consideration. Another comment suggested revising the SAR Information Section which states that "The primary goal of this SAR is to allow the Standard Drafting Team (SDT) for Project 2014-04, Physical Security to develop a standard(s) to address the directives of the March 7, 2014 FERC Order ....." The comment suggested modifying this to reflect the fact that the purpose of the SAR is to allow the SDT to modify the requirements of the existing Standard CIP-014-1 (Physical Security) to address the directives of FERC. The PSSDT believes that the existing language is sufficient and has elected to not revise the SAR.

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<sup>1</sup> The appeals process is in the Standard Processes Manual: [http://www.nerc.com/comm/SC/Documents/Appendix\\_3A\\_StandardsProcessesManual.pdf](http://www.nerc.com/comm/SC/Documents/Appendix_3A_StandardsProcessesManual.pdf)

1. The SAR for Project 2014-04 (the original project for the CIP-014-1, Physical Security standard) was revised to address the directive from FERC to to remove the term “widespread” from Reliability Standard CIP-014-1 or, alternatively, to propose modificatons to the Reliability Standard that address the Commission’s concerns. Do you agree with the proposed revisions to the SAR? If not, please provide specific comments regarding the SAR. .... 8



Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
4.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1																
5.	Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1																
6.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10																
7.	Kathleen Goodman	ISO - New England	NPCC	2																
8.	Michael Jones	National Grid	NPCC	1																
9.	Mark Kenny	Northeast Utilities	NPCC	1																
10.	Helen Lainis	Independent Electricity System Operator	NPCC	2																
11.	Connie Lowe	Dominion Resources Services, Inc.	NPCC	5																
12.	Alan MacNaughton	New Brunswick Power Corporation	NPCC	9																
13.	Bruce Metruck	New York Power Authority	NPCC	6																
14.	Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5																
15.	Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10																
16.	Robert Pellegrini	The United Illuminating Company	NPCC	1																
17.	Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1																
18.	David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5																
19.	Brian Robinson	Utility Services	NPCC	8																
20.	Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3																
21.	Brian Shanahan	National Grid	NPCC	1																
22.	Wayne Sipperly	New York Power Authority	NPCC	5																
23.	Ben Wu	Orange and Rockland Utilities Inc.	NPCC	1																
3.	Group	Andrea Jessup	Bonneville Power Administration		X		X		X	X										
<b>Additional Member Additional Organization Region Segment Selection</b>																				
1.	Neil Arthurs	Physical Security	WECC	1																
2.	Tim Eubank	System Operations	WECC	1																
4.	Group	Connie Lowe	Dominion		X		X		X	X										
<b>Additional Member Additional Organization Region Segment Selection</b>																				
1.	Randi Heise	NERC Compliance Policy	NPCC	5, 6																
2.	Louis Slade	NERC Compliance Policy	RFC	5, 6																
3.	Larry Nash	Electric Transmission Compliance	SERC	1, 3, 5, 6																
5.	Group	Michael Lowman	Duke Energy		X		X		X	X										
<b>Additional Member Additional Organization Region Segment Selection</b>																				

Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
1. Doug Hils		RFC	1																	
2. Lee Schuster		FRCC	3																	
3. Dale Goodwine		SERC	5																	
4. Gerg Cecil		RFC	6																	
6.	Group	Jason Marshall	ACES Standards Collaborators							X										
	<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>																
1.	Bob Solomon	Hoosier Energy	RFC	1																
2.	Mark Ringhausen	Old Dominion Electric Cooperative	SERC	3, 4																
3.	Chip Koloini	Golden Spread Electric Cooperative	SPP	3, 5																
4.	Shari Heino	Brazos Electric Power Cooperative	ERCOT	1, 5																
5.	Ellen Watkins	Sunflower Electric Power Corporation	SPP	1																
6.	Ginger Mercier	Prairie Power	SERC	3																
7.	Kevin Lyons	Central Iowa Power Cooperative	MRO	1																
8.	Sarah Snow	South Mississippi Electric	SERC	1, 3, 4, 6																
7.	Group	Joe Tarantino	Large Public Power Council		X		X	X	X	X										
	<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>																
1.		Austin Energy	ERCOT	1, 3, 4, 5, 6																
2.		Chelan PUD	WECC	1, 3, 5, 6																
3.		Clark PUD	WECC	1																
4.		Colorado Springs	WECC	1, 3, 6																
5.		Grant PUD	WECC	1, 3, 5																
6.		Grant PUD	SPP	NA																
7.		Jacksonville (JEA)	FRCC	1, 3, 5																
8.		Long Island	NPCC	1																
9.		Los Angeles DWP	WECC	1, 3, 5, 6																
10.		CPS Energy	ERCOT	1, 3, 5																
11.		Electricities North Carolina	SERC	3, 6																
12.		Lower Colorado River Authority	ERCOT	1, 5																
13.		MEAG	SERC	1, 3, 5																
14.		Nebraska PPD	MRO	1, 3, 5																
15.		New York Power Authority	NPCC	1, 3, 5, 6																

Group/Individual		Commenter	Organization	Registered Ballot Body Segment																
				1	2	3	4	5	6	7	8	9	10							
16.		Omaha PPD	MRO	1, 3, 5, 6																
17.		Orlando (OUC)	FRCC	1, 3, 5, 6																
18.		Platte River Power Authority	WECC	1, 3, 5, 6																
19.		Salt River Project	WECC	1, 3, 5, 6																
20.		Santee Cooper	SERC	1, 3, 5, 6																
21.		Seattle City Light	WECC	1, 3, 4, 5, 6																
22.		Snohomish County PUD	WECC	1, 3, 4, 5, 6																
23.		Tacoma Public Utilities	WECC	1, 3, 4, 5, 6																
8.	Individual	Chris Scanlon	Exelon		X		X		X	X										
9.	Individual	Amy Casuscelli	Xcel Energy		X		X		X	X										
10.	Individual	Mike Smith	Manitoba Hydro		X		X		X	X										
11.	Individual	Mark Wilson	Independent Electricity System Operator			X														
12.	Individual	Mike Smith	Manitoba Hydro		X		X		X	X										
13.	Individual	Maryclaire Yatsko	Seminole Electric Cooperative, Inc.		X		X	X	X	X										
14.	Individual	David Thorne	Pepco Holdings Inc.		X		X													
15.	Individual	David Kiguel	David Kiguel																X	
16.	Individual	Andrew Z. Pusztai	American Transmission Company, LLC		X															
17.	Individual	David Jendras	Ameren		X		X		X	X										

If you support the comments submitted by another entity and would like to indicate you agree with their comments, please select "agree" below and enter the entity's name in the comment section (please provide the name of the organization, trade association, group, or committee, rather than the name of the individual submitter).

Summary Consideration: N/A

Organization	Agree	Supporting Comments of "Entity Name"
N/A	N/A	N/A

1. The SAR for Project 2014-04 (the original project for the CIP-014-1, Physical Security standard) was revised to address the directive from FERC to to remove the term “widespread” from Reliability Standard CIP-014-1 or, alternatively, to propose modifications to the Reliability Standard that address the Commission’s concerns. Do you agree with the proposed revisions to the SAR? If not, please provide specific comments regarding the SAR.

**Summary Consideration:** All those submitting comments agreed with the proposed revisions to the SAR. Several comments suggested that the drafting team consider making revisions to the standard in addition to simply removing the term “widespread” from the standard. These comments suggest modifying CIP-014-1 to make clear that a facility that has a critical impact on the operation of an Interconnection is critical and therefore subject to Requirement R1. Another comment suggested that any clarification made to the CIP-014 Standard should be consistent with current applicable standards; for example in the TPL-001-4 standard Requirement R6 requires the Transmission Planner and Planning Coordinator to define their criteria or methodology used in the analysis for the identification of System instability. These comments will be forwarded to the PSSDT for their consideration. Another comment suggested revising the SAR Information Section which states that "The primary goal of this SAR is to allow the Standard Drafting Team (SDT) for Project 2014-04, Physical Security to develop a standard(s) to address the directives of the March 7, 2014 FERC Order ....." The comment suggested modifying this to reflect the fact that the purpose of the SAR is to allow the SDT to modify the requirements of the existing Standard CIP-014-1 (Physical Security) to address the directives of FERC. The PSSDT believes that the existing language is sufficient and has elected to not revise the SAR.

Organization	Yes or No	Question 1 Comment
Tennessee Valley Authority	Yes	
Northeast Power Coordinating Council	Yes	
Bonneville Power Administration	Yes	BPA has no issues with the removal of the term “widespread” since it is not used elsewhere and is not a Continent-wide Term referenced in the NERC Glossary of Terms Used in Reliability Standards. However, NERC needs to be very clear and concise as to how they define a facility as “critical” and what constitutes “critical impact” to the interconnection to ensure there is no

Organization	Yes or No	Question 1 Comment
		room for interpretation among entities. BPA believes that the definition in Requirement R1 should not be dependent on how an applicable entity interprets the term “widespread” but instead should be modified to make clear that a facility that has a critical impact on the operation of an Interconnection is critical and therefore subject to Requirement R1.
Dominion	Yes	
Duke Energy	Yes	Duke Energy agrees with the proposed revisions to the SAR, including the removal of the term “widespread” from the standard. In FERC Order 802, the Commission directed NERC to remove the term “widespread”, or in the alternative, propose specific modifications to the Reliability Standard that address the Commission’s concerns. Duke Energy recommends that if the drafting team considers making modifications to the Standard to address the FERC’s concerns, that the team consider inserting the language “critical impact on the operation of the interconnection” into the Standard. We feel that this language helps clarify and narrow down possible interpretations of what constitutes instability within an interconnection.
ACES Standards Collaborators	Yes	We agree the proposed changes to the SAR address the Commission directive. However, we caution the drafting team to consider carefully how simply removing “widespread” could alter the original intent of the requirement. Widespread was added to reflect that there can be local stability issues that will not jeopardize the reliability of the overall bulk electric system. If the loss of Transmission substation or station will only cause a local stability issue, we do not believe it should be identified as requiring physical security measures. We believe this view is consistent with the intent of original FERC order directing the creation of the standard.
Large Public Power Council	Yes	The members of the Large Public Power Council agree with either the removal or modification of the word “widespread” in the Physical Security

Organization	Yes or No	Question 1 Comment
		<p>Standard to address the Commission’s concern. However, we urge the Standard Drafting Team to address the following: Any clarification made to the CIP-014 Standard should be consistent with current applicable standards, for example in the TPL-001-4 standard Requirement R6 requires the Transmission Planner and Planning Coordinator to define their criteria or methodology used in the analysis for the identification of System instability. This approach should not subject certain Facilities to the CIP-014 standard where acceptable conditions are met through acceptable performance criteria identified by the TP/PC and thereby would not deem a particular Facility as having a critical impact on the operation of the interconnection. Additionally, some degree of flexibility may be necessary across regions. Performance characteristics are potentially different between the Eastern Interconnect and the Western Interconnect; one region may be more sensitive to frequency stability while the other may be more sensitive to voltage stability. Those Regional differences would be considered/accounted for through the TP/PC’s documentation of System instability (TPL-001-4 R6).</p>
Exelon	Yes	<p>The Exelon Companies, PECO, ComEd and BGE, agree that removing “Widespread” from the text of the standard satisfies the concerns raised by FERC. We believe this is an efficient and effective approach to clarify the standard language and complete the Project so that implementation can begin in earnest.</p>
Xcel Energy	Yes	
Manitoba Hydro	Yes	No comment.
Independent Electricity System Operator	Yes	

Organization	Yes or No	Question 1 Comment
Manitoba Hydro	Yes	No comments.
Seminole Electric Cooperative, Inc.	Yes	
Pepco Holdings Inc.	Yes	
David Kiguel	Yes	The SAR Information Section states that "The primary goal of this SAR is to allow the Standard Drafting Team (SDT) for Project 2014-04, Physical Security to develop a standard(s) to address the directives of the March 7, 2014 FERC Order ....." This Section should be modified to reflect the fact that the purpose of the SAR is to allow the SDT to modify the requirements of the existing Standard CIP-014-1 (Physical Security) to address the directives of FERC.
American Transmission Company, LLC	Yes	
Ameren	Yes	

END OF REPORT