Unofficial Comment Form

Project 2016-02 Modifications to CIP Standards

Transmission Owner (TO) Control Center (TOCC) Performing Transmission Operator (TOP) Obligations, CIP-002-6

**Do not** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments
on **CIP-002-6 – Cyber Security – BES Cyber System Categorization**. The electronic form must be submitted by **8 p.m. Eastern, Monday, October 30, 2017**. **m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project%202016-02%20Modifications%20to%20CIP%20Standards.aspx). If you have questions, contact Standards Developers, Katherine Street at (404) 446-9702 or Mat Bunch at (404) 446-9785.

## Background Information

The purpose of Project 2016-02 is to (1) address the Federal Energy Regulatory Commission (Commission) directives contained in Order No. 822 and (2) consider the Version 5 Transition Advisory Group (V5TAG) issues identified in the CIP V5 Issues for Standard Drafting Team Consideration (V5TAG Transfer Document). The V5TAG consisted of representatives from FERC, NERC, Regional Entities and industry stakeholders. It was formed to issue guidance on possible methods to achieve compliance with the CIP V5 standards and to support industry’s implementation activities. In the course of the V5TAG’s activities, it identified certain issues with the CIP Reliability Standards that would be better addressed by a standard drafting team (SDT) for the CIP Reliability Standards. The V5TAG developed the [CIP Version 5 Issues for Standard Drafting Team Consideration](http://www.nerc.com/pa/Stand/Project%20201602%20Modifications%20to%20CIP%20Standards%20DL/Transfer_Issues_V5TAG-SDT_1st-final-03232016.pdf) document (V5TAG Transfer Document) to formally recommend that the SDT address these issues during the standards development process, and to consider modifications to the standard language.

Among other issues, the V5TAG recommended clarification of the phrase “used to perform the functional obligations of the Transmission Operator” in CIP-002-5.1a, Attachment 1, Criterion 2.12.

Accordingly, the Project 2016-02 SDT proposes the following modifications to CIP-002-5.1a, Attachment 1, Criterion 2.12 to clarify the applicability of requirements to a TO Control Center that performs the functional obligations of a TOP.

The proposed criterion establishes an average MVA line loading, based on voltage class, for BES Transmission Lines operated between 100 and 499 kV. The aggregate weighted value for applicable BES Cyber Systems must exceed 6000 to meet the minimum threshold established in Criterion 2.12 and can be calculated by summing the "weight value per line" shown in the associated table for each BES Transmission Line monitored and controlled by the Control Center or backup Control Center. If the aggregate weight value of lines exceed 6000, the Control Center’s associated BES Cyber System(s) must be identified as medium impact. If the aggregate weight value of lines does not exceed 6000, the Control Center’s associated BES Cyber System(s) must be evaluated for classification as low impact pursuant to Criterion 3.1.

## Guidelines and Technical Basis

At NERC’s direction, the current draft Guidelines and Technical Basis section will be removed from the Reliability Standard template prior to final ballot. The SDT will evaluate the content for placement in a Technical Rationale document for posting along with, but separate from, the Reliability Standard. Additionally, the SDT may develop Implementation Guidance on this Reliability Standard to submit for ERO endorsement based on the content of this section.

## SDT Approach

The Project 2016-02 SDT proposes the following modifications to CIP-002-5.1a, Attachment 1, Criterion 2.12 to clarify the applicability of requirements for a TO Control Center that performs the functional obligations of a TOP. This proposed criterion establishes a minimum threshold for medium impact BES Cyber Systems associated with Control Centers that monitor and control BES Transmission Lines, regardless of a Responsible Entity’s functional registration. This allows TOs and TOPs to identify their BES Cyber Systems associated with Control Centers as medium or low impact based on the BES Cyber System’s span of control. This contrasts with the currently approved Criterion 2.12, which identifies BES Cyber Systems as medium impact when they are associated with a Control Center or backup Control Center used to perform the functional obligations of the TOP and not included in the high impact rating.

## Questions

1. Criterion 2.12: In the V5TAG Transfer Document, the V5TAG requested the SDT to “clarify the applicability of requirements on a TO Control Center that perform the functional obligations of a TOP, particularly if the TO has the capability to operate switches, breakers, and relays in the BES.” The SDT modified CIP-002-5.1a Attachment 1, Criterion 2.12 to make this clarification. Do you agree that the revision clarifies the applicability of Criterion 2.12? If not, please provide your rationale and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. Criterion 2.12: The SDT modified CIP-002-5.1a Attachment 1, Criterion 2.12 to be similar to the construct used in Criterion 2.5. Do you agree with the SDT’s approach in the modified criterion to evaluate a BES Cyber System’s span of control by summing the weighted value of each BES Transmission Line that the BES Cyber System monitors and controls? If not, please provide your rationale and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. Criterion 2.12: Do you agree with the 6000 aggregate weighted value that is used in Criterion 2.12 to establish the minimum threshold for medium impact BES Cyber Systems associated with Control Centers that monitor and control Transmission? If not, please provide your rationale and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. Criterion 2.12: The SDT modified Criterion 2.12 to categorize BES Cyber Systems associated with Control Centers that monitor and control Transmission regardless of a Responsible Entity’s functional registration. Do you agree with this approach? If not, please provide your rationale and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. Criterion 2.12: Do you agree with the proposed modifications to Criterion 2.12? If not, please provide your rationale and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. Implementation Plan: Do you agree with the SDT’s proposed Implementation Plan? If you agree with the proposed implementation time period, please note the actions you will take that require this amount of time to complete. If you think an alternate implementation time period is needed – shorter or longer - please propose an alternate implementation plan and provide a detailed explanation of actions and time needed to meet the implementation deadline.

[ ]  Yes

[ ]  No

Comments:

1. The SDT considered a number of approaches and determined that proposed CIP-002-6 provides entities with flexibility to meet the reliability objectives in a cost effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for a more cost effective approach that addresses the reliability objective, please provide your recommendation and, if appropriate, technical justification.

[ ]  Yes

[ ]  No

Comments:

1. If you have additional comments on proposed CIP-002-6, Attachment 1, Criterion 2.12 that you have not provided in response to the questions above, please provide them here.

Comments: