Unofficial Comment Form

Project 2016-02 Modifications to CIP Standards

CIP-002-6

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **CIP-002-6 - Cyber Security – BES Cyber System Categorization**. Comments must be submitted by **8 p.m. Eastern, Monday, December 16, 2019**. **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 Standard Developer, Jordan Mallory (via email) or at (404) 446-2589.

## Background Information

Project 2016-02 was formed 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, which consisted of representatives from NERC, Regional Entities, and industry stakeholders, was formed to issue guidance regarding possible methods to achieve compliance with the CIP Version 5 standards and to support industry’s implementation activities. During 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 Transition Advisory Group Issues for Consideration](http://www.nerc.com/pa/Stand/Project%20201602%20Modifications%20to%20CIP%20Standards%20DL/Transfer_Issues_V5TAG-SDT_1st-final-03232016.pdf) document to formally recommend that the SDT address these issues and consider modifications to the standard language during the standards development process. Among other issues of 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. The Project 2016-02 Standard Drafting Team (SDT) proposes the following modifications to CIP-002-5.1a, Attachment 1, Criterion 2.12 to clarify the applicability of requirements on 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. The aggregate weighted value is 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 BES Cyber System(s) exceeds the 6000 aggregate weighted value, it should be identified as a medium impact BES Cyber System. If the BES Cyber System does not exceed the 6000 aggregate weighted value, it should be categorized as a low impact BES Cyber System pursuant to Criterion 3.1.

The drafting team received comments from the July 2019 45-day comment and ballot period regarding the Planned and Unplanned changes section within CIP-002-6. Upon consideration of these comments and the issues raised, the team determined that the matter of the CIP-002 identification and categorization periodicity is a larger issue that needs to be addressed holistically within CIP-002 including its requirements and criteria. Therefore the team voted to restore the Planned and Unplanned Changes section to its previous state within the Implementation Plan and a SAR will be drafted to address these types of modifications in a future project. The CIP-002-6 standard will move forward with the TOCC modifications and other minor updates (i.e., removal of the retired term SPS, etc.).

## Questions

1. Attachment 1, Criterion 2.12: Modifications were made to the Attachment 1, Criterion 2.12 to provide clarity. Do you agree with the proposed modifications in CIP-002-6 Attachment 1, Criterion 2.12? If not, please provide your rationale and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. Based on comments received from industry, the SDT reverted the Planned and Unplanned Changes section back to current state by removing it from the Effective Date section of CIP-002-6 and moving the existing language from the CIP-002-5.1a Implementation Plan into the CIP-002-6 Implementation Plan (with only updates to version information). Do you agree with the proposed modification? If no, please provide your rationale and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT believes proposed modifications in CIP-002-6 provide 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 improvement to enable more cost effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

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

Comments: