Unofficial Comment Form

Project 2016-02 Modifications to CIP Standards | Draft 5

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on draft 5 of the **Modifications to CIP standards** by **8 p.m. Eastern, Thursday, November 16, 2023.**

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 Manager of Standards Development, Alison Oswald (404) 275-9410.

## Background Information

Project 2016-02 (1) addresses the Federal Energy Regulatory Commission (Commission) directives contained in Order No. 822 and (2) considers 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.

## Summary of Changes Overview

## The SDT reviewed all comments and made modifications to the Reliability Standards and Definitions accordingly. The most extensive changes were made to CIP-010 regarding change management scope. CIP-005 changes were centered around R2 including further clarifications for IRA and the related definitions. CIP-007's changes were centered on the new Requirement Part 1.3 regarding sharing CPU and memory resources in SCI scenarios. CIP-004's changes were to add scoping of systems that include "with IRA" since IRA is no longer dependent on ERC. The changes to CIP-003 were primarily to back out examples that had been added in the TCA section (Attachment 1) in previous drafts due to the number of comments with questions those examples drove.

## The proposed new and revised definitions are not balloted separately but are being balloted via the standards. As such, when voting on the standards, ballot body participants will also be voting on the proposed new and revised definitions used in those standards. The definitions are posted in one document among the other ballot materials. CIP-003, CIP-004, CIP-005, CIP-007, and CIP-010 are being balloted again due to either failing ballot or updates needing to be reballoted through industry. The remaining CIP standards that passed the previous ballot (CIP-002, CIP-006, CIP-008, CIP-009, CIP-011, and CIP-013) will be included for final ballot as all modifications in the suite of standards are dependent upon each other and must pass as a group.

## Questions

In order to allow the SDT to sort responses received by topic, please submit comments with the respective question.

1. The SDT has modified the IRA definition, CIP-005 R2 and CIP-004 Applicable Systems to address IRA in routable to nonroutable (i.e., IP to serial) conversion scenarios. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT modified other (not related to IRA) definitions used in the CIP standards based on industry comments. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT revised CIP-005 R1 based on industry comments. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT revised CIP-007 based on industry comments. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT made numerous clarifying changes to CIP-010 based on industry comments. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT revised CIP-003. Do you agree with the proposed changes to these Reliability Standards? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT has revised the Implementation Plan to accommodate for the future enforceable date of CIP-003-9. Do you agree with the proposed Implementation Plan? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

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