Unofficial Comment Form

Project 2016-02 Modifications to CIP Standards

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on the **Virtualization Modifications** by **8 p.m. Eastern, Friday, August 13, 2021.
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 Senior Standards Developer, Jordan Mallory (404-446-2589).

## 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. Among other issues, the V5TAG stated “The CIP Version 5 standards comments.

## Summary of Changes Overview

The SDT reviewed all comments and made modifications to the Reliability Standards and Definitions accordingly. The SDT revised many standards based on industry comments to revert much of the language back to previously approved, which will be reflected as redline, but is currently the approved language. Below are questions the SDT is seeking industry input. In order to allow the SDT to sort comments received by topic, the SDT respectfully requests comments be submitted with the respective question topic. The SDT thanks industry for your time and review during this comment period.

## Questions

1. Are the two options for identification of SCI within CIP-002 clear and is it understood that when SCI is included in the CIP Systems that it is treated like the CIP System, it is a part of for CIP Requirement Applicability?

[ ]  Yes

[ ]  No

Comments:

1. The Applicable Systems column may include “SCI identified independently…” Is this clear or is additional clarification (such as “SCI identified as supporting, but not part of…”) needed?

[ ]  Yes

[ ]  No

Comments:

1. The SDT modified the ERC definition to reference “outside the asset containing”. This is to allow scoping based on connectivity of the logging systems as required by CIP-007 Requirement R4 as well as the scoping of requirement parts in CIP-004 and CIP-006 based on risk. Do you agree with the proposed change?  If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT proposes that the modified ESP definition can be used for both traditional firewall based networks, as well as future networks such as zero trust. Do you agree with the proposed change? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT modified the IRA definition based on industry comments. Do you agree with the proposed change? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT modified the Management Interface definition based on industry comments. Do you agree with the proposed change? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. As discussed in the CIP Definitions and Exemptions Technical Rationale (TR), the SDT believes that the use of configurations or policy in the modified ESP definition can reduce the burden of documenting ESPs in a zero trust environment. Do you agree with the proposed change? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT added new and revised several defined terms to incorporate virtualization and future technologies within the CIP Standards. Do you agree with the proposed changes to the NERC Glossary terms? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. The SDT revised CIP-002 based on industry comments. Do you agree with the proposed changes to the CIP-002 Reliability Standard? If not, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

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

[ ]  Yes

[ ]  No

Comments:

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

[ ]  Yes

[ ]  No

Comments:

1. The SDT revised CIP-003, CIP-004, CIP-006, CIP-008, CIP-009, CIP-011, and CIP-013 (conforming changes) based on industry comments. 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. Please provide any additional comments for the SAR drafting team to consider, if desired.