

Consideration of Comments

Project Name:	2023-04 Modifications to CIP-003 Draft 3
Comment Period Start Date:	6/12/2024
Comment Period End Date:	7/11/2024
Associated Ballot(s):	2023-04 Modifications to CIP-003 CIP-003-A AB 3 ST 2023-04 Modifications to CIP-003 Implementation Plan AB 3 OT

There were 54 sets of responses, including comments from approximately 156 different people from approximately 92 companies representing 10 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the [project page](#).

If you feel that your comment has been overlooked, 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, contact Manager of Standards Information, [Nasheema Santos](#) (via email) or at (404) 446-2564.

Questions

1. Do you agree with the language proposed in CIP-003-11 Attachment 1? If you do not agree, please explain why and provide recommended language you would support and, if appropriate, technical, or procedural justification.

2. Do you agree with the language proposed in CIP-003-11 Attachment 2? If you do not agree, please explain why and provide recommended language you would support and, if appropriate, technical, or procedural justification.

3. The Drafting Team (DT) proposes a three (3) year implementation plan for CIP-003-11. Do you agree with the proposed implementation plan? If you think an alternate timeframe is needed, please propose an alternate implementation plan with detailed explanation.

4. The DT believes the language of CIP-003-11 addresses the issues outlined in the SAR 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.

5. Provide any additional comments on the standard and technical rationale for the DT to consider, if desired.

The DT created a CIP-003-12 standard, CIP-003-12 implementation plan and a summary of changes document for this posting. Please review these files prior to answering this question.

6. Do you have any concerns in the way CIP-003-10 (Project 2016-02 changes) and CIP-003-11 (Project 2023-04 changes) were combined to create standard CIP-003-12?

The DT created a CIP-003-12 standard, CIP-003-12 implementation plan and a summary of changes document for this posting. Please review these files prior to answering this question.

[7. Do you have any concerns in the CIP-003-12 implementation plan that should be addressed?](#)

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
MRO	Anna Martinson	1,2,3,4,5,6	MRO	MRO Group	Shonda McCain	Omaha Public Power District (OPPD)	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jamison Cawley	Nebraska Public Power District	1,3,5	MRO
					Jay Sethi	Manitoba Hydro (MH)	1,3,5,6	MRO
					Husam Al-Hadidi	Manitoba Hydro (System Performance)	1,3,5,6	MRO
					Kimberly Bentley	Western Area Power Administration	1,6	MRO
					Jaimin Patal	Saskatchewan Power Corporation (SPC)	1	MRO
					George Brown	Pattern Operators LP	5	MRO
Larry Heckert	Alliant Energy (ALTE)	4	MRO					

					Terry Harbour	MidAmerican Energy Company (MEC)	1,3	MRO
					Dane Rogers	Oklahoma Gas and Electric (OG&E)	1,3,5,6	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Ayotte	ITC Holdings	1	MRO
					Andrew Coffelt	Board of Public Utilities-Kansas (BPU)	1,3,5,6	MRO
					Peter Brown	Invenergy	5,6	MRO
					Angela Wheat	Southwestern Power Administration	1	MRO
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
Tennessee Valley Authority	Brian Millard	1,3,5,6	SERC	TVA RBB	Ian Grant	Tennessee Valley Authority	3	SERC
					David Plumb	Tennessee Valley Authority	1	SERC

					Armando Rodriguez	Tennessee Valley Authority	6	SERC
					Nehtisha Rollis	Tennessee Valley Authority	5	SERC
Santee Cooper	Carey Salisbury	5		Santee Cooper	Rodger Blakely	Santee Cooper	1,3,5,6	SERC
					Christine Pope	Santee Cooper	1,3,5,6	SERC
					Lachelle Brooks	Santee Cooper	1,3,5,6	SERC
					Rene' Free	Santee Cooper	1,3,5,6	SERC
					Bob Rhett	Santee Cooper	1,3,5,6	SERC
					Bridget Coffman	Santee Cooper	1,3,5,6	SERC
					Wanda Williams	Santee Cooper	1,3,5,6	SERC
					Jordan Steele	Santee Cooper	1,3,5,6	SERC
WEC Energy Group, Inc.	Christine Kane	3		WEC Energy Group	Christine Kane	WEC Energy Group	3	RF
					Matthew Beilfuss	WEC Energy Group, Inc.	4	RF
					Clarice Zellmer	WEC Energy Group, Inc.	5	RF
					David Boeshaar	WEC Energy Group, Inc.	6	RF
Manitoba Hydro	Jay Sethi	1,3,5,6	MRO	Manitoba Hydro Group	Nazra Gladu	Manitoba Hydro	1	MRO
					Mike Smith	Manitoba Hydro	3	MRO

					Kristy-Lee Young	Manitoba Hydro	5	MRO
					Kelly Bertholet	Manitoba Hydro	6	MRO
Jennie Wike	Jennie Wike		WECC	Tacoma Power	Jennie Wike	Tacoma Public Utilities	1,3,4,5,6	WECC
					John Merrell	Tacoma Public Utilities (Tacoma, WA)	1	WECC
					John Nierenberg	Tacoma Public Utilities (Tacoma, WA)	3	WECC
					Hien Ho	Tacoma Public Utilities (Tacoma, WA)	4	WECC
					Terry Gifford	Tacoma Public Utilities (Tacoma, WA)	6	WECC
					Ozan Ferrin	Tacoma Public Utilities (Tacoma, WA)	5	WECC
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF

					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy-FirstEnergy	1,3,4,5,6	RF
					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF
Michael Johnson	Michael Johnson		WECC	PG&E All Segments	Marco Rios	Pacific Gas and Electric Company	1	WECC
					Sandra Ellis	Pacific Gas and Electric Company	3	WECC
					Tyler Brun	Pacific Gas and Electric Company	5	WECC
Black Hills Corporation	Rachel Schuldt	6		Black Hills Corporation - All Segments	Micah Runner	Black Hills Corporation	1	WECC
					Josh Combs	Black Hills Corporation	3	WECC
					Rachel Schuldt	Black Hills Corporation	6	WECC
					Carly Miller	Black Hills Corporation	5	WECC
					Sheila Suurmeier	Black Hills Corporation	5	WECC

Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power Coordinating Council	10	NPCC
					Deidre Altobell	Con Edison	1	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC
					Stephanie Ullah- Mazzuca	Orange and Rockland	1	NPCC
					Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC
					Randy Buswell	Vermont Electric Power Company	1	NPCC
					James Grant	NYISO	2	NPCC
					Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
					David Burke	Orange and Rockland	3	NPCC
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC

Salvatore Spagnolo	New York Power Authority	1	NPCC
Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
David Kwan	Ontario Power Generation	4	NPCC
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
Sean Cavote	PSEG	4	NPCC
Jason Chandler	Con Edison	5	NPCC
Tracy MacNicoll	Utility Services	5	NPCC
Shivaz Chopra	New York Power Authority	6	NPCC
Vijay Puran	New York State Department of Public Service	6	NPCC
David Kiguel	Independent	7	NPCC
Joel Charlebois	AESI	7	NPCC
Joshua London	Eversource Energy	1	NPCC

					Nicolas Turcotte	Hydro-Quebec (HQ)	1	NPCC
					Jeffrey Streifling	NB Power Corporation	1,4,10	NPCC
					Joel Charlebois	AESI	7	NPCC
					John Hastings	National Grid	1	NPCC
					Erin Wilson	NB Power	1	NPCC
					James Grant	NYISO	2	NPCC
					Michael Couchesne	ISO-NE	2	NPCC
					Kurtis Chong	IESO	2	NPCC
					Michele Pagano	Con Edison	4	NPCC
					Bendong Sun	Bruce Power	4	NPCC
					Carvers Powers	Utility Services	5	NPCC
					Wes Yeomans	NYSRC	7	NPCC
Dominion - Dominion Resources, Inc.	Sean Bodkin	6		Dominion	Connie Lowe	Dominion - Dominion Resources, Inc.	3	NA - Not Applicable
					Lou Oberski	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable
					Larry Nash	Dominion - Dominion Virginia Power	1	NA - Not Applicable

					Rachel Snead	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable
Western Electricity Coordinating Council	Steven Rueckert	10		WECC CIP	Steve Rueckert	WECC	10	WECC
					Morgan King	WECC	10	WECC
					Deb McEndaffer	WECC	10	WECC
					Tom Williams	WECC	10	WECC
Tim Kelley	Tim Kelley		WECC	SMUD and BANC	Nicole Looney	Sacramento Municipal Utility District	3	WECC
					Charles Norton	Sacramento Municipal Utility District	6	WECC
					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Foung Mua	Sacramento Municipal Utility District	4	WECC
					Nicole Goi	Sacramento Municipal Utility District	5	WECC
					Kevin Smith	Balancing Authority of Northern California	1	WECC

1. Do you agree with the language proposed in CIP-003-11 Attachment 1? If you do not agree, please explain why and provide recommended language you would support and, if appropriate, technical, or procedural justification.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer No

Document Name

Comment

FirstEnergy finds the scope is too great for larger utilities to be successfully accomplished as well as within the timeframe suggested by these proposals.

Likes 0

Dislikes 0

Response

Thank you for your comment. The Drafting Team (DT) has taken efforts to not prescribe any specific technological configurations throughout the modified requirement language. It is important to note that the SDT considered language requirements to include capabilities for centralized (or decentralized) electronic access capabilities between a low impact BES Cyber System(s) and a Cyber Asset(s) outside the asset containing low impact BES Cyber System(s) and using a routable protocol when entering or leaving the asset containing the low impact BES Cyber System(s) – which simplifies the implementation of electronic access controls. In doing so, the DT has allowed the Responsible Entities flexibility in how they choose to implement controls and methods to accomplish said requirements. The DT is operating within the bounds of the SAR provided to it that was approved by the Standards Committee based upon recommendations from the LICRT Report.

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Although section 3.1.2 is within the scope of the SAR BPA still believes it creates a higher compliance bar for Low BCS than for Medium BCS outside of Control Centers and inconsistencies within the standards. The proposed language requires detection of known/suspected malicious communications for “inbound and outbound electronic remote access.” There is no similar requirement for Medium BCS unless they are at a Control Center (see Draft 5 of CIP-005-8 R1.5).

BPA suggests that this requirement be removed for better consistency with the requirements for Medium BCS or the applicability be changed to bring it in-line with other requirements.

Likes 0

Dislikes 0

Response

Thank you for your comments. Per your comments, the basis for the enhancements to CIP-003 are from the October 2022 Low Impact Criteria Review Report – of which developed SARs based on FERC requests. The language used in section 3.1.2 is in the same vein as the approved language in Section 6.3 Vendor Electronic Remote Access Security Controls of CIP-003-9 with the scope being expanded to all electronic access that meets section 3.1 (i), (ii), and (iii), instead of being vendor specific.

Michael Johnson - Michael Johnson On Behalf of: Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer No

Document Name

Comment

Section 3.1.2 is requiring malicious communication detection which is not even required at medium sites (CIP-005-7 or CIP-005-8). It does not make sense to require it at lows unless there is going to be a change to require it for mediums as well.

Section 4 and Section 5 cannot be accomplished without knowing the individual assets that are part of the low impact Cyber Systems. The note that states a list of low assets is not required is a fallback that entities are using to justify not accomplishing the requirements of section 4 and 5. The requirement to classify individual assets should be required to accomplish all the changes in requirements.

Likes 0

Dislikes 0

Response

Thank you for your comments. The DT understands this is a new requirement for lows, however overall there are more requirements associated with mediums than there are lows (please see the low impact report). The language used in section 3.1.2 is similar to the approved language in Section 6.3 Vendor Electronic Remote Access Security Controls of CIP-003-9 with the scope being expanded to all electronic access that meets section 3.1 (i), (ii), and (iii), instead of being vendor specific. The DT has not added proposed language that would require the identification of an asset's low impact BES Cyber Systems (BCS) or their collective BES Cyber Assets (BCA). Please refer to figures 4 and 5 of the Technical Rationale document for examples of how to accomplish Part 3.1.4 without knowing the individual BCSs or their BCAs. For Part 3.1.5, the DT has preserved the approved language under Section 6.1 Vendor Electronic Remote Access Security Controls of CIP-003-9 with the only change being removing it from Section 6 and appending it to Section 3. Part 3.1.5 is focused on documenting the method used to determine vendor remote access, but does not require a list of low impact BCSs or their BCAs.

Alison Nickells - NiSource - Northern Indiana Public Service Co. - 1 - RF

Answer No

Document Name

Comment

The additional language in Section 3 does not fully mitigate the coordinated attack risk for LIBCS as the controls do not address distributed network accessibility from IBRs. Also, the suggested Requirements are more stringent than BCS classified as Medium Impact without ERC.

Likes 0

Dislikes 0

Response

Thank you for your comments. The DT understands this is a new requirement for lows, however overall there are more requirements associated with mediums than there are lows (please see the low impact report). The SDT is only allowed to work within the constraints of the SAR and cannot fully address distributed network accessibility from IBRs.

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC

Answer	No
Document Name	

Comment

CIP-003-11 Attachment 1, Section 3, Part 3.1.2 does not specify whether the requirement is to detect known or suspected malicious communications for **both** encrypted and/or unencrypted traffic.

SMUD recommends changing the language to:

3.1.2 Detect known or suspected malicious communications for both inbound and outbound electronic **unencrypted** access;

Likes	0
Dislikes	0

Response

Thank you for your comments. The language leaves open the possibility to use a variety of means to satisfy the action of detecting malicious communications. Section 3.1 Parts (i), (ii), and (iii) define the electronic access covered by Section 3. If those conditions are met then the controls must be implemented regardless if the is encrypted or unencrypted. The SDT left the standard open for entities to match their chosen technologic solution to their architecture.

Jeffrey Streifling - NB Power Corporation - 1

Answer	No
Document Name	

Comment

We are confused with the foundation starting with CIP-003-9 which was modified based upon project 2016-02 virtualization creating CIP-003-10 which has not been approved by FERC. CIP-003-11 changes do not appear to align or clearly track the changes in the last approved CIP-003-9 language. CIP-003-12 attempts to combine CIP-003-10 and the proposed CIP-003-11 but does not seem to capture all changes. We recommend merging the proposed language in CIP-003-11 and CIP-003-12, merge the implementation plans, and repost after FERC approves CIP-003-10 in a new ballot.

Likes 0

Dislikes 0

Response

Thank you for your comment. The DT created CIP-003-11 to specifically build upon the approved CIP-003-9 standard. The DT created CIP-003-12 to incorporate the CIP-003-10 modifications which have been approved by the NERC Board of Trustees as a way of holistically incorporating both Project 2016-02 and Project 2023-04 changes to CIP-003, in the case that CIP-003-10 is approved by FERC before CIP-003-11. The Implementation Plan for this version also includes the provisions for both CIP-003-10 and CIP-003-11. For additional information please see the industry webinar [recording](#).

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer No

Document Name

Comment

For Attachment 1, Part 3.1.2 – As proposed, this currently applies to all low impact BES Cyber Systems but does not apply to Medium Impact Facilities that are not Control Centers. The DT needs to ensure that the reliability risks of both low and medium impact facilities are appropriately and consistently applied.

Likes 0

Dislikes 0

Response

Thank you for your comments. The DT understands this is a new requirement for lows, however overall there are more requirements associated with mediums than there are lows (please see the low impact report). Per your comments, the basis for the enhancements to CIP-003 are from the October 2022 [Low Impact Criteria Review Report](#) – of which developed SARs based on FERC requests. The language used in section 3.1.2 is in the same vein as the approved language in Section 6.3 Vendor Electronic Remote Access Security Controls of CIP-003-9 with the scope being expanded to all electronic access that meets section 3.1 (i), (ii), and (iii), instead of being vendor specific.

James Keele - Entergy - 3

Answer	No
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Document Name	
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Comment

Comments: Section 3.1.3 could be reworded to be less confusing. The intent appears to be requiring authentication of remote access into a LIBCS based on the verbiage “through which user-initiated electronic access applicable to Section 3.1 is subsequently permitted”. However, the Section 3.1 that is referenced may bring local access into question, as Section 3.1 includes both inbound (remote) and outbound access (local) from the LIBCS as it only mentions traffic “between a [LIBCS] and a Cyber Asset(s) outside the asset containing [LIBCS]” with no mention of traffic direction or origination point. This could require authentication in all cases of network access where traffic is leaving the site, if users could even be 100% aware of the destination of all information generated by their session and authentication may need to be implemented for all sessions. It may be difficult to implement an outbound access solution, and would potentially bring authentication prior to connecting to a non-CIP system into scope.

The Technical Rationale section again supports the notion that the scope includes access “from a remote client outside the asset containing the LIBCS and destined for a LIBCS within the asset”. This specifically notes an origination point and a traffic direction, which is missing in the language of the requirement.

The requirement should specify traffic origination and direction for authentication if it is indeed scoped only to remote access. If local network access is intended to be included, then a requirement for remote access authentication and a separate requirement for local system access should be created and mirror the requirements of CIP-005 and CIP-007.

Likes	0
Dislikes	0
Response	
<p>[Thank you for your comments. The intent of the language addresses authentication for remote access which sources outside of the low impact BES Cyber System and asset. The phrase, “through which user-initiated electronic access applicable to Section 3.1 is subsequently permitted” is included in Section 3.1.3 to clarify scoping. As 3.1.3 is written at a different granularity of “network(s) containing” (which is not mentioned in the romanettes), this phrasing simply clarifies that the intended scope remains those networks through which the specific access described in the Section 3.1 romanettes is subsequently permitted. As 3.1.3 requires authentication of the user before access to the network(s) containing low impact BCS, it is not applicable to physically local logon to the low impact BCS and subsequent outbound access since the origin of the access is the network(s) containing the low impact BCS.]</p>	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	No
Document Name	
Comment	
OPG supports NPCC Regional Standards Committee’s comments.	
Likes	0
Dislikes	0
Response	
Thank you for your comment, please see response to NPCC Regional Standards Committee.	
Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez	
Answer	No
Document Name	
Comment	

Commented [AO1]: Jay to add about outbound

Commented [AO2R1]: Explain why the language is in 3.1

Commented [JC3R1]: SDT: check this response. It is a valid point made in the comment, but I think putting directionality into 3.1.3 will further complicate the requirement. Therefore, the response here rests on the fact that if the origin of the access IS the network containing, the requirement is just not applicable because there is no “prior to” point at which to perform it.

Commented [AO4R1]: complete

• The proposed changes to the language in section 1.1 of the “C. Compliance” area of the standard is problematic. What “Applicable Governmental Authority” could enforce compliance other than FERC, NERC or the Regional Entity in their “respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions”? How is “Applicable” defined?

• Language in section 3, particularly 3.1.1 through 3.1.6 and 3.2, is perceived to be arduous and expensive to implement and maintain compliance with, and could result in negative results. More money and people will be required to ensure compliance rather than focus on the goal, which is to secure the systems against adversaries. Low impact assets are low impact or they are not. By adding the requirements to permit only necessary inbound and outbound access, detect known or suspected malicious communications, authenticate each user prior to permitting access, protecting user authentication information, determine vendor electronic access and disabling vendor access this is, in essence, raising the level of compliance requirements, and subsequently to the audit requirements thereof, to a state equivalent to Medium impact.

• Recommendations: Leave it alone. Unless there are metrics to prove that the existing standards are not adequately protecting the critical infrastructure relating directly to root causes identifying these sections of the standards, then modifications to them should not be made, especially modifications that would result in an undue burden to the financial stability of the Responsible entity due to additional compliance requirements, labor, capital costs and potential fines for non-compliance.

• Cancel all changes to CIP-003-9 and the SAR should be reviewed and recommendations made to change the criterion for Medium impact based on objective and measurable criteria rather than expect responsible entities to acquiesce to the recommendation by the LICRT to change all low impact requirements.

Likes 0

Dislikes 0

Response

Thank you for your comments. The changes in the compliance area of the standard are to align with the new standard template. Per Appendix 2 of the ROP: ““Applicable Governmental Authority” means the FERC within the United States and the appropriate governmental authority with subject matter jurisdiction over reliability in Canada and Mexico.”

The DT understands this is a new requirement for lows, however overall there are more requirements associated with mediums than there are lows (please see the low impact report). The SDT is only allowed to work within the constraints of the SAR and does not have the authority to cancel all changes to CIP-003-9.

Ellese Murphy - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF

Commented [A05]: NERC to write a response

Commented [A06R5]: Complete, team check

Answer	Yes
Document Name	
Comment	
Duke Energy supports the proposed language.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments.	
Richard Vendetti - NextEra Energy - 5	
Answer	Yes
Document Name	
Comment	
NEE supports EEI's comments: "EEI supports the language proposed in CIP-003-11 Attachment 1."	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments.	
Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 5	
Answer	Yes
Document Name	
Comment	

Supporting EEI comments	
Likes	0
Dislikes	0
Response	
Thank you for your comments, please see response to EEI.	
Matt Carden - Southern Company - Southern Company Services, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Southern Company is in agreement with EEI along with the following comment: Southern asks that a clarification as to intent be made at least in the Technical Rationale document that for 3.1.3 when it states “Authenticate each user” that it does not imply that every remote user must have an individual user account, precluding the use of shared accounts by valid and authorized users for remote access.	
Likes	0
Dislikes	0
Response	
Thank you for your comments. The drafting team made clarifying changes to the Technical Rationale. []	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	

Commented [AO7]: Did we make these changes in the TR?

Exelon is aligned with EEI in response to this question.

Likes 0

Dislikes 0

Response

Thank you for your comments, please see response to EEI.

Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer Yes

Document Name

Comment

CenterPoint Energy Houston Electric, LLC (CEHE) supports the proposed language in CIP-003-11 Attachment 1.

Likes 0

Dislikes 0

Response

Thank you for your support.

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

Exelon supports the comments submitted by the EEI for this question.

Likes 0

Dislikes	0
Response	
Thank you for your comments, please see response to EEI.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name TVA RBB	
Answer	Yes
Document Name	
Comment	
TVA requests clarification that a list of users is not required to be maintained for vendor remote access.	
Likes	0
Dislikes	0
Response	
Thank you for your comment, please refer to the note under requirement R2.	
Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI supports the language proposed in CIP-003-11 Attachment 1.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	Yes
Document Name	
Comment	
The NAGF supports the proposed language in CIP-003-11 Attachment 1.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Selene Willis - Edison International - Southern California Edison Company - 5	
Answer	Yes
Document Name	
Comment	
See comments from EEI	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment, please see response to EEI.	
Michael Moltane - International Transmission Company Holdings Corporation - 1	
Answer	Yes
Document Name	

Comment	
Support EEI	
Likes	0
Dislikes	0
Response	
Thank you for your comment, please see response to EEI.	
Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Rebika Yitna - Rebika Yitna On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - Rebika Yitna	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0

Response	
Thank you for your support.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO, Group Name Manitoba Hydro Group	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Ijad Dewan - Hydro One Networks, Inc. - 1 - NPCC	
Answer	Yes
Document Name	

Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Erik Gustafson - PNM Resources - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Thank you for your support.	
Fausto Serratos - Los Angeles Department of Water and Power - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Robert Kerrigan - Los Angeles Department of Water and Power - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marvin Johnson - DTE Energy - Detroit Edison Company - 3	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Tyler Schwendiman - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Thank you for your support.	
Karen Artola - CPS Energy - 1,3,5 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC CIP	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Robert Follini - Avista - Avista Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Andrew Smith - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	

Likes	0	
Dislikes	0	
Response		
Thank you for your support.		
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group		
Answer	Yes	
Document Name		
Comment		
Likes	1	Lincoln Electric System, 1, Johnson Josh
Dislikes	0	
Response		
Thank you for your support.		
TRACEY JOHNSON - Southern Indiana Gas and Electric Co. - 3,5,6 - RF		
Answer	Yes	
Document Name		
Comment		
Likes	0	
Dislikes	0	
Response		
Thank you for your support.		

Alan Kloster - Alan Kloster On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Alan Kloster

Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0

Response

Thank you for your support.

Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nick Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh

Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0

Response

Thank you for your support.

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Carver Powers - Utility Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Leshel Hutchings - AEP - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Carey Salisbury - Santee Cooper - 5, Group Name Santee Cooper	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	
Document Name	
Comment	

We are confused with the foundation starting with CIP-003-9 which was modified based upon project 2016-02 virtualization creating CIP-003-10 which has not been approved by FERC. CIP-003-11 changes do not appear to align or clearly track the changes in the last approved CIP-003-9 language. CIP-003-12 attempts to combine CIP-003-10 and the proposed CIP-003-11 but does not seem to capture all changes. We recommend merging the proposed language in CIP-003-11 and CIP-003-12, merge the implementation plans, and repost after FERC approves CIP-003-10 in a new ballot.

Likes 0

Dislikes 0

Response

Thank you for your comment. The DT created CIP-003-11 to specifically build upon the approved CIP-003-9 standard. The DT created CIP-003-12 to incorporate the CIP-003-10 modifications which have been approved by the NERC Board of Trustees as a way of wholistically incorporating both Project 2016-02 and Project 2023-04 changes to CIP-003, in the case that CIP-003-10 is approved by FERC before CIP-003-11. The Implementation Plan for this version also includes the provisions for both CIP-003-10 and CIP-003-11. For additional information please see the industry webinar [recording](#).

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer

Document Name

Comment

WEC Energy Group supports the language proposed in CIP-003-11.

Likes 0

Dislikes 0

Response

Thank you for your support.

2. Do you agree with the language proposed in CIP-003-11 Attachment 2? If you do not agree, please explain why and provide recommended language you would support and, if appropriate, technical, or procedural justification.

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez

Answer No

Document Name

Comment

• Suggested language changes throughout section 3 have completely vacated the approved CIP-003-8 and the changes are monumental. All changes are perceived to be arduous and expensive to implement and maintain compliance with, and could result in negative results. More money and people will be required to ensure compliance rather than focus on the goal, which is to secure the

systems against adversaries. Low impact assets are low impact or they are not. By adding the requirements to show the ability to detect and authenticate, protect, determine and disable, this is, in essence, raising the level of compliance requirements, and subsequently the audit requirements thereof, to a state equivalent to a Medium impact facility.

• Cancel all changes to CIP-003-9 and the SAR should be reviewed and recommendations made to change the criterion for Medium impact based on objective and measurable criteria rather than expect responsible entities to acquiesce to the recommendation by the LICRT to change all low impact requirements.

Likes 0

Dislikes 0

Response

Thank you for your comments. The DT understands this is a new requirement for lows, however overall there are more requirements associated with mediums than there are lows (please see the low impact report). The SDT is only allowed to work within the constraints of the SAR and does not have the authority to cancel all changes to CIP-003-9.

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer No

Document Name

Comment

OPG supports NPCC Regional Standards Committee’s comments.

Likes 0

Dislikes 0

Response

Thank you for your comment, please see response to NPCC.

David Jendras Sr - Ameren - Ameren Services - 3

Answer No

Document Name	
Comment	
Ameren suggests removing OEM sheets from the list of documentation. An OEM would not provide recommendations on how to use a device or consider what is necessary for electronic access by the entity.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. The use of a OEM is only a example of what may be used, but some may provide examples of ports and services that could be used for operational purposes.	
Jeffrey Streifling - NB Power Corporation - 1	
Answer	No
Document Name	
Comment	
We are confused with the foundation starting with CIP-003-9 which was modified based upon project 2016-02 virtualization creating CIP-003-10 which has not been approved by FERC. CIP-003-11 changes do not appear to align or clearly track the changes in the last approved CIP-003-9 language. CIP-003-12 attempts to combine CIP-003-10 and the proposed CIP-003-11 but does not seem to capture all changes. We recommend merging the proposed language in CIP-003-11 and CIP-003-12, marge the implementation plans, and repost after FERC approves CIP-003-10 in a new ballot.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. The DT created CIP-003-11 to specifically build upon the approved CIP-003-9 standard. The DT created CIP-003-12 to incorporate the CIP-003-10 modifications which have been approved by the NERC Board of Trustees as a way of wholistically	

incorporating both Project 2016-02 and Project 2023-04 changes to CIP-003, in the case that CIP-003-10 is approved by FERC before CIP-003-11. The Implementation Plan for this version also includes the provisions for both CIP-003-10 and CIP-003-11. For additional information please see the industry webinar [recording](#).

Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nick Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh

Answer No

Document Name

Comment

NST suggests adding username/password to the list of user authentication mechanisms cited in Section 3, Item 3 as possible ways to address requirement 3.1.3 of Attachment 1, Section 3. We believe this addition to be justified by the fact the Technical Rationale document mentions username and password in its discussion of Attachment 1, Section 3.1.4.

Likes 0

Dislikes 0

Response

Thank you for your comments. There are many possible ways to meet the requirements of Section 3.1.3, the examples listed are only a few and does not limit the implementation of the section if a mechanism is not listed.

Alison Nickells - NiSource - Northern Indiana Public Service Co. - 1 - RF

Answer No

Document Name

Comment

Please refer to the comments provided in Question 1 above.

Likes 0

Dislikes 0

Response	
Thank you for your comments, please see response in question 1.	
Michael Johnson - Michael Johnson On Behalf of: Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	No
Document Name	
Comment	
Do not agree with 3.1.2 for Malware Detection unless it is going to be required at medium sites as well.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment, this is not an exhaustive list but a sampling of options to meet the requirement.	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
<p>Although section 3.1.2 is within the scope of the SAR BPA still believes it creates a higher compliance bar for Low BCS than for Medium BCS outside of Control Centers and inconsistencies within the standards. The proposed language requires detection of known/suspected malicious communications for “inbound and outbound electronic remote access.” There is no similar requirement for Medium BCS unless they are at a Control Center (see Draft 5 of CIP-005-8 R1.5).</p> <p>BPA suggests that this requirement be removed for better consistency with the requirements for Medium BCS or the applicability be changed to bring it in-line with other requirements.</p>	

BPA recommends the SDT include a documentation option outside of OEM spec sheets as, depending on equipment, these may not be available. BPA also believes internal proof of testing should be allowable in case OEM was not available.

Likes 0

Dislikes 0

Response

Thank you for your comments. The DT understands this is a new requirement for lows, however overall there are more requirements associated with mediums than there are lows (please see the low impact report). The use of a OEM is only a example of what may be used, but some may provide examples of ports and servcies that could be used for operational purposes.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer No

Document Name

Comment

{FirstEnergy finds the scope is too great for larger utilities to be successfully accomplished as well as within the timeframe suggested by these proposals.}

Likes 0

Dislikes 0

Response

Thank you for your comment. Attachment 2 is not inclusive of all measures and simply a finite list of examples.

Michael Moltane - International Transmission Company Holdings Corporation - 1

Answer Yes

Document Name

Comment

Commented [A08]: Circle back to this after discussing IP

Support EEI	
Likes 0	
Dislikes 0	
Response	
Thank you for your support, please see response to EEI.	
Selene Willis - Edison International - Southern California Edison Company - 5	
Answer	Yes
Document Name	
Comment	
See comments from EEI	
Likes 0	
Dislikes 0	
Response	
Thank you for your support, please see response to EEI.	
Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	Yes
Document Name	
Comment	
The NAGF supports the proposed language in CIP-003-11 Attachment 2.	
Likes 0	

Dislikes	0
Response	
Thank you for your support.	
Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
<p>EI supports the language proposed in CIP-003-11 Attachment 2 as it conforms with the revised language in Attachment 1.</p> <p>EI provides the non-substantive edit to change the case of the terms “Intrusion Detection System (IDS)/Intrusion Prevention System (IPS)” and “Security Incident and Event Management (SIEM)” in Attachment 2, Section 3, part 2 to lowercase because they are not NERC Glossary defined terms and do not require capitalization.]</p>	
Likes	0
Dislikes	0
Response	
Thank you for your comments. We have addressed the capitalization issue in the standard.	
Alan Kloster - Alan Kloster On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute for Question #2.	
Likes	0

Commented [AO9]: Circle back to this, would be more changes than the two terms they mentioned

Commented [AO10R9]: Discussed with Kristine, might have changes in sections this team did not modify

Dislikes	0
Response	
Thank you for your support, please see response to EEI.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI for this question.	
Likes	0
Dislikes	0
Response	
Thank you for your support, please see response to EEI.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
CEHE tentatively supports the proposed language in CIP-003-11 Attachment 2, but would like to request further clarification on Section 3, part 1, bullet 3 in the snippet included below:	
Section 3. Electronic Access Controls: Examples of evidence for Section 3 may include, but are not limited to:	
<ol style="list-style-type: none"> For Section 3.1.1, documentation showing the permittance of only inbound and outbound electronic access, where electronic access meets Section 3.1, Parts (i), (ii), and (iii), that the Responsible Entity deems necessary, such as: 	

• Representative diagrams that illustrate control of inbound and outbound communication(s) between the low impact BES Cyber System(s) and a Cyber Asset(s) outside the asset containing low impact BES Cyber System(s);

• Lists of implemented electronic access controls (e.g., access control lists restricting IP addresses, ports, or services; implementing unidirectional gateways); or

• *Original Equipment Manufacturer (OEM) specification sheets that provide rationale around necessary electronic access.*

CEHE requests further clarification on the process in determining how the inclusion of OEM specification sheets would be considered sufficient evidence for Electronic Access Controls. CEHE understands that the provided example is merely a suggestion but would like to request more clarification on how this could be utilized.

Likes 0

Dislikes 0

Response

Thank you for your comment. The use of a OEM is only a example of what may be used, but some may provide examples of ports and services that could be used for operational purposes.

Kinte Whitehead - Exelon - 3

Answer Yes

Document Name

Comment

Exelon is aligned with EEI in response to this question.

Likes 0

Dislikes 0

Response	
Thank you for your support, please see response to EEI.	
Matt Carden - Southern Company - Southern Company Services, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Southern Company is in agreement with the EEI comments:	
EEI supports the language proposed in CIP-003-11 Attachment 2 as it conforms with the revised language in Attachment 1.	
EEI provides the non-substantive edit to change the case of the terms “Intrusion Detection System (IDS)/Intrusion Prevention System (IPS)” and “Security Incident and Event Management (SIEM)” in Attachment 2, Section 3, part 2 to lowercase because they are not NERC Glossary defined terms and do not require capitalization.	
Likes	0
Dislikes	0
Response	
Thank you for your support, please see response to EEI.	
Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 5	
Answer	Yes
Document Name	
Comment	
Supporting EEI comments	
Likes	0

Dislikes	0
Response	
Thank you for your support, please see response to EEI.	
Richard Vendetti - NextEra Energy - 5	
Answer	Yes
Document Name	
Comment	
EEI provides the non-substantive edit to change the case of the terms “Intrusion Detection System (IDS)/Intrusion Prevention System (IPS)” and “Security Incident and Event Management (SIEM)” in Attachment 2, Section 3, part 2 to lowercase because they are not NERC Glossary defined terms and do not require capitalization.”	
Likes	0
Dislikes	0
Response	
Thank you for your support, please see response to EEI.	
Ellese Murphy - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Duke Energy supports the proposed language and supports the non-substantive revisions proposed by EEI.	
Likes	0
Dislikes	0
Response	

Thank you for your support, please see response to EEI.	
Carey Salisbury - Santee Cooper - 5, Group Name Santee Cooper	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
James Keele - Entergy - 3	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Leshel Hutchings - AEP - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Carver Powers - Utility Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name TVA RBB	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
TRACEY JOHNSON - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Thank you for your support.	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	Yes
Document Name	
Comment	
Likes 1	Lincoln Electric System, 1, Johnson Josh
Dislikes 0	
Response	
Thank you for your support.	
Andrew Smith - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Robert Follini - Avista - Avista Corporation - 3	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC CIP	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Karen Artola - CPS Energy - 1,3,5 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Tyler Schwendiman - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Marvin Johnson - DTE Energy - Detroit Edison Company - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Robert Kerrigan - Los Angeles Department of Water and Power - 5

Answer Yes

Document Name

Comment

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Fausto Serratos - Los Angeles Department of Water and Power - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Erik Gustafson - PNM Resources - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Ijad Dewan - Hydro One Networks, Inc. - 1 - NPCC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO, Group Name Manitoba Hydro Group

Answer Yes

Document Name

Comment

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Rebika Yitna - Rebika Yitna On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - Rebika Yitna	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6	

Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	
Document Name	
Comment	
We are confused with the foundation starting with CIP-003-9 which was modified based upon project 2016-02 virtualization creating CIP-003-10 which has not been approved by FERC. CIP-003-11 changes do not appear to align or clearly track the changes in the last approved CIP-003-9 language. CIP-003-12 attempts to combine CIP-003-10 and the proposed CIP-003-11 but does not seem to capture all changes. We recommend merging the proposed language in CIP-003-11 and CIP-003-12, merge the implementation plans, and repost after FERC approves CIP-003-10 in a new ballot.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. The DT created CIP-003-11 to specifically build upon the approved CIP-003-9 standard. The DT created CIP-003-12 to incorporate the CIP-003-10 modifications which have been approved by the NERC Board of Trustees as a way of wholistically incorporating both Project 2016-02 and Project 2023-04 changes to CIP-003, in the case that CIP-003-10 is approved by FERC before CIP-	

003-11. The Implementation Plan for this version also includes the provisions for both CIP-003-10 and CIP-003-11. For additional information please see the industry webinar [recording](#).

3. The Drafting Team (DT) proposes a three (3) year implementation plan for CIP-003-11. Do you agree with the proposed implementation plan? If you think an alternate timeframe is needed, please propose an alternate implementation plan with detailed explanation.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer No

Document Name

Comment

FirstEnergy finds this an enormous undertaking for larger organizations/entities to meet expectations within the 3-year implementation plan. Considerations for network buildouts and firewalls as well as coordination with transmission planning and implementation must be taken into consideration. FirstEnergy requests the Drafting Team to consider a staged implementation plan to allow for planning, scheduling, budgeting, and implementing to ensure full compliance toward the scope of CIP-003 and protection of the BES. These required steps would necessitate a longer implementation that allows 18-24 months to develop an implementation plan, budget and staff for the implementation over time, and permit a number of years for staged implementations following CIP-003-09 based on reasonable criteria set by the utility which would, of course, be overseen by the RE.

Likes 0

Dislikes 0

Response

The DT thanks you for your comment, the team has made changes to the IP to ensure a full 36 months for the work needed to comply.

TRACEY JOHNSON - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer No

Document Name	
Comment	
Southern Indiana Gas and Electric d/b/a CenterPoint Energy Indiana South (SIGE) has concerns that having multiple versions of the standard and simultaneously working on modifications, is causing confusion. Without having approved versions, further proposed revisions seem a bit premature.	
Likes 0	
Dislikes 0	
Response	
The DT has worked to reduce the confusing with the next posting and will be posting a single version with a single implementation plan.	
Jeffrey Streifling - NB Power Corporation - 1	
Answer	No
Document Name	
Comment	
CIP-003-11 and CIP-003-12 implementation plan should be combined and repost after FERC approves CIP-003-10 in a new ballot. NPCC recommends only having one implementation timeframe and TFIST prefers 36-month timeframe.	
Likes 0	
Dislikes 0	
Response	
The DT has worked to reduce the confusing with the next posting and will be posting a single version with a single implementation plan.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	No
Document Name	

Comment

Dominion Energy recommends a 5-year implementation plan with a phased approach for the implementation of devices required to achieve compliance with the IDS / IDP provisions in Part 3.1.2, The milestones and methodology for the implementation should be at the direction of the Registered Entity.

Likes 0

Dislikes 0

Response

The DT thanks you for your comment, the team has made changes to the IP to ensure a full 36 months for the work needed to comply.

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer No

Document Name

Comment

OPG supports NPCC Regional Standards Committee's comments.

Likes 0

Dislikes 0

Response

Thank you for your comment, please see response to NPCC.

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez

Answer No

Document Name

Comment

• By adding the requirements to show the ability to detect and authenticate, protect, determine and disable, this is, in essence, raising the level of compliance requirements, and subsequently the audit requirements thereof, to a state equivalent to a Medium impact facility.

• Cancel all changes to CIP-003-9 and the SAR should be reviewed and recommendations made to change the criterion for Medium impact based on objective and measurable criteria rather than expect responsible entities to acquiesce to the recommendation by the LICRT to change all low impact requirements.

Likes 0

Dislikes 0

Response

[Thank you for your comments. The DT understands this is a new requirement for lows, however overall there are more requirements associated with mediums than there are lows (please see the low impact report). The SDT is only allowed to work within the constraints of the SAR and does not have the authority to cancel all changes to CIP-003-9.]

Carey Salisbury - Santee Cooper - 5, Group Name Santee Cooper

Answer No

Document Name

Comment

Santee Cooper would request a five-year implementation plan for the additional security controls listed in CIP-003-11. It would take time and money to implement these controls into over 100 low impact sites. Santee Cooper is in the process of rolling out routable communication to its low impact sites and this would require us to revisit each site to implement these additional security controls.

Likes 0

Dislikes 0

Response

The DT thanks you for your comment, the team has made changes to the IP to ensure a full 36 months for the work needed to comply.

Commented [AO11]: This is the same response we have used above for this entity. Is it appropriate or should it be modified?

Ellese Murphy - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Duke Energy supports EEI comments.	
Likes	0
Dislikes	0
Response	
Thank you for your comment, please see response to EEI.	
Erik Gustafson - PNM Resources - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
The implementation plan for CIP-003-11 includes a footnote that states:	
“1 On May 9, 2024, the NERC Board of Directors approved the retirement of Reliability Standard CIP-003-9, which was scheduled to take effect on April 1, 2026, when it approved revised Reliability Standard CIP-003-10. CIP-003-10 is pending regulatory approval. This implementation plan is intended to retire whichever version of the CIP-003 Reliability Standard that is then in effect.”	
With many concurrent CIP-003 version projects, it is possible that CIP-003-11 gets approved before CIP-003-10. Regardless of which version gets approved first, the wording in the footnote states that CIP-003-9 was to take effect on April 1, 2026. Is CIP-003-9 still effective April 1, 2026, or will CIP-003-10 or CIP-003-11 (or CIP-003-12) supersede the effective date of CIP-003-9?	
Likes	0
Dislikes	0

Response

Thank you for your comment, the team has made changes to the IP to ensure a full 36 months for the work needed to comply and to remove confusion will be posting on a single standard and single IP.

Richard Vendetti - NextEra Energy - 5

Answer Yes

Document Name

Comment

NEE supports EEI's comments: "EEI supports the proposed three-year implementation plan for CIP-003-11 and appreciates the drafting team's acknowledgement that the revisions proposed in CIP-003-11 do not conflict but build upon the implementation of CIP-003-9 which has an effective date of April 1, 2026, however, we recommend removing the footnote on page 1 of the implementation plan regarding the retirement of CIP-003-9.

The effective dates and retirement dates of the different versions of CIP-003 are discussed clearly in the General Considerations section and Retirement Date Section. Including the information in a footnote has not been standard practice and the Implementation Plan is clearer without it."

Likes 0

Dislikes 0

Response

Thank you for your comment, please see response to EEI.

Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 5

Answer Yes

Document Name

Comment

Supporting EEI comments	
Likes	0
Dislikes	0
Response	
Thank you for your comment, please see response to EEI.	
Matt Carden - Southern Company - Southern Company Services, Inc. - 1	
Answer	Yes
Document Name	
Comment	
<p>Southern Company is in agreement with the EEI comments:</p> <p>EEI supports the proposed three-year implementation plan for CIP-003-11 and appreciates the drafting team’s acknowledgement that the revisions proposed in CIP-003-11 do not conflict but build upon the implementation of CIP-003-9 which has an effective date of April 1, 2026, however, we recommend removing the footnote on page 1 of the implementation plan regarding the retirement of CIP-003-9.</p> <p>The effective dates and retirement dates of the different versions of CIP-003 are discussed clearly in the General Considerations section and Retirement Date Section. Including the information in a footnote has not been standard practice and the Implementation Plan is clearer without it.</p>	
Likes	0
Dislikes	0
Response	
Thank you for your comment, please see response to EEI.	
Kinte Whitehead - Exelon - 3	
Answer	Yes

Document Name	
Comment	
Exelon is aligned with EEI in response to this question.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment, please see response to EEI.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
CEHE supports the comments as submitted by the Edison Electric Institute (EEI)	
EEI Comments:	
EEI supports the proposed three-year implementation plan for CIP-003-11 and appreciates the drafting team's acknowledgement that the revisions proposed in CIP-003-11 do not conflict but build upon the implementation of CIP-003-9 which has an effective date of April 1, 2026, however, we recommend removing the footnote on page 1 of the implementation plan regarding the retirement of CIP-003-9.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment, please see response to EEI.	
Daniel Gacek - Exelon - 1	

Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI for this question.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment, please see response to EEI.	
Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments	
Answer	Yes
Document Name	
Comment	
Black Hills Corporation agrees with EEI's comments on question 7: Black Hills Corporation is concerned about the proposed effective date for CIP-003-12. CIP-003-12 is the alignment of the Project 2023-04 changes with conforming changes from Project 2016-02 Virtualization, which is pending FERC approval. Given its pending approval, it is difficult to understand if the 24-month period would provide a shorter implementation timeframe than the 36-month period proposed for CIP-003-11. EEI supports a 36-month implementation period for the draft revisions and asks for that timeframe regardless of the version of CIP-003 approved.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment, please see response to EEI.	

Alan Kloster - Alan Kloster On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Alan Kloster

Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute for Question #3.	
Likes	0
Dislikes	0

Response

Thank you for your comment, please see response to EEI.

Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer	Yes
Document Name	
Comment	
EEI supports the proposed three-year implementation plan for CIP-003-11 and appreciates the drafting team’s acknowledgement that the revisions proposed in CIP-003-11 do not conflict but build upon the implementation of CIP-003-9 which has an effective date of April 1, 2026, however, we recommend removing the footnote on page 1 of the implementation plan regarding the retirement of CIP-003-9.	
The effective dates and retirement dates of the different versions of CIP-003 are discussed clearly in the General Considerations section and Retirement Date Section. Including the information in a footnote has not been standard practice and the Implementation Plan is clearer without it.	
Likes	0
Dislikes	0

Response	
The DT thanks you for your comment, the team has made changes to the IP to ensure a full 36 months for the work needed to comply and to remove confusion will be posting on a single standard and single IP.	
Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	Yes
Document Name	
Comment	
The NAGF supports the proposed three (3) year implementation plan for CIP-003-11.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Selene Willis - Edison International - Southern California Edison Company - 5	
Answer	Yes
Document Name	
Comment	
See comments from EEI	
Likes	0
Dislikes	0
Response	
Thank you for your support, please see response to EEI.	

Michael Moltane - International Transmission Company Holdings Corporation - 1	
Answer	Yes
Document Name	
Comment	
Support EEI	
Likes 0	
Dislikes 0	
Response	
Thank you for your support, please see response to EEI.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
WEC Energy Group supports the comments of EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support, please see response to EEI.	
Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6	
Answer	Yes
Document Name	

Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Rebika Yitna - Rebika Yitna On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - Rebika Yitna	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Thank you for your support.	
Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO, Group Name Manitoba Hydro Group	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Ijad Dewan - Hydro One Networks, Inc. - 1 - NPCC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Fausto Serratos - Los Angeles Department of Water and Power - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Robert Kerrigan - Los Angeles Department of Water and Power - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marvin Johnson - DTE Energy - Detroit Edison Company - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Michael Johnson - Michael Johnson On Behalf of: Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Tyler Schwendiman - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Thank you for your support.	
Alison Nickells - NiSource - Northern Indiana Public Service Co. - 1 - RF	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Karen Artola - CPS Energy - 1,3,5 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC CIP	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Robert Follini - Avista - Avista Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Andrew Smith - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	

Likes	0	
Dislikes	0	
Response		
Thank you for your support.		
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group		
Answer	Yes	
Document Name		
Comment		
Likes	1	Lincoln Electric System, 1, Johnson Josh
Dislikes	0	
Response		
Thank you for your support.		
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foug Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC		
Answer	Yes	
Document Name		
Comment		
Likes	0	
Dislikes	0	
Response		

Thank you for your support.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name TVA RBB	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nick Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Carver Powers - Utility Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Leshel Hutchings - AEP - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

James Keele - Entergy - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	
Document Name	
Comment	

CIP-003-11 and CIP-003-12 implementation plan should be combined and repost after FERC approves CIP-003-10 in a new ballot. NPCC recommends only having one implementation timeframe and TFIST prefers 36-month timeframe.

Likes 0

Dislikes 0

Response

The DT thanks you for your comment, the team has made changes to the IP to ensure a full 36 months for the work needed to comply and to remove confusion will be posting a single standard and single IP.

4. The DT believes the language of CIP-003-11 addresses the issues outlined in the SAR 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.

Carey Salisbury - Santee Cooper - 5, Group Name Santee Cooper

Answer No

Document Name

Comment

Implementing CIP-003-11 would not be cost effective for Santee Cooper. We are installing routable communication at our low impact facilities. However, when developing the plans to roll out routable communication to our low impact facilities we didn't consider CIP-003-11. To comply with CIP-003-11 we would have to add additional support and incur significant cost in adding equipment or software licenses to comply.

Likes 0

Dislikes	0
Response	
<p>The DT understands that implementing changes in the standard may incur costs in effort and implementation, as is the case with any changes made to standards. The proposed changes are suitable given the necessity to protect the reliability of BES Cyber Systems against compromise. Considering this, cost effectiveness is achieved by the ability to implement changes with widely used industry tools and practices for securing network access to sensitive data, which makes them cost-effective. The required controls are common access controls in the current landscape of frequent and persistent cyber-attack attempts.</p> <p>The DT intends that the proposed approach relies on common IT technical skills.</p> <p>Required controls are not detailed for individual low-impact cyber systems, they allow authentication for a "network(s)," which can refer to one or several networks. This eliminates the need for repetitive or re-authentication for sub-networks. Instead, authentication is specified at the level of "networks containing" or "asset containing."</p>	
<p>Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez</p>	
Answer	No
Document Name	
Comment	
<p>• Just the recommended changes to Appendix 2 make the DT claims that the language addresses the issues outlined in the SAR cost effectively objectively false. Just the technology needed to comply with the language makes that claim unreasonable, much less the cost of labor for implementation, maintenance, audit, troubleshooting and lifecycle replacement.</p>	
Likes	0
Dislikes	0
Response	
<p>The DT understands that implementing changes in the standard may incur costs in effort and implementation, as is the case with any changes made to standards. The proposed changes are suitable given the necessity to protect the reliability of BES Cyber Systems against</p>	

compromise. Considering this, cost effectiveness is achieved by the ability to implement changes with widely used industry tools and practices for securing network access to sensitive data, which makes them cost-effective. The required controls are common access controls in the current landscape of frequent and persistent cyber-attack attempts.

The DT intends that the proposed approach relies on common IT technical skills.

The DT clarified to include "Intermediate System" implementations providing additional permitted options. The DT has clarified that "Intermediate System" implementations are included, allowing for additional authorized alternatives.

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer	No
Document Name	
Comment	
<p>Dominion Energy does not think the methods listed in the SAR are cost effective. Any methods that require installation of devices that support IDS/IDP for Low Impact within larger Registered Entities is an expensive undertaking. Other methods that can be used to comply with the standard, such as manual reviews and SIEMs also have a significant cost associated with them.</p>	
Likes	0
Dislikes	0

Response

The DT understands that implementing changes in the standard may incur costs in effort and implementation, as is the case with any changes made to standards. The proposed changes are suitable given the necessity to protect the reliability of BES Cyber Systems against compromise. Considering this, cost effectiveness is achieved by the ability to implement changes with widely used industry tools and practices for securing network access to sensitive data, which makes them cost-effective. The required controls are common access controls in the current landscape of frequent and persistent cyber-attack attempts.

The DT intends that the proposed approach relies on common IT technical skills.

Required controls are not detailed for individual low-impact cyber systems, they allow authentication for a "network(s)," which can refer to one or several networks. This eliminates the need for repetitive or re-authentication for sub-networks. Instead, authentication is specified at the level of "networks containing" or "asset containing."

The DT clarified to include "Intermediate System" implementations providing additional permitted options. The DT has clarified that "Intermediate System" implementations are included, allowing for additional authorized alternatives.

Jeffrey Streifling - NB Power Corporation - 1

Answer	No
Document Name	
Comment	
We have no comments on the cost-effectiveness of CIP-003-11. We will note that the cost effectiveness of CIP-003-12 was not asked in this comment form.	
Likes	0
Dislikes	0

Response

Thank you for your comments.

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer	No
Document Name	
Comment	
GO/GOPs will need more information to adequately assess the cost effectiveness of the proposed approach.	
Likes	0
Dislikes	0

Response	
Thank you for your comments.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foug Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC	
Answer	No
Document Name	
Comment	
SMUD views the language in CIP-003-11 as neither cost effective nor cost ineffective. If CIP-003-11 Attachment 1, Section 3, Part 3.1.2 requires the detection of suspected malicious communications that is encrypted [emphasis added], then the language of CIP-003-11 would not be cost effective due to the additional cost of implementing the inspection of encrypted traffic.	
Likes	0
Dislikes	0
Response	
Thank you for your comments. The SDT will take into consideration your comments. The DT intends that the proposed approach relies on common IT technical skills. Considering this, cost effectiveness is achieved by the ability to implement changes with widely used industry tools and practices for securing network access to sensitive data, which makes them cost-effective.	
Alison Nickells - NiSource - Northern Indiana Public Service Co. - 1 - RF	
Answer	No
Document Name	
Comment	

There will be costs associated with implementing additional IDS, monitoring, equipment upgrades, and resources to both implement and maintain. It is uncertain at this time if the language will provide a cost-effective solution.

Likes 0

Dislikes 0

Response

Thank you for your comments. The SDT will take into consideration your comments. The DT understands that implementing changes in the standard may incur costs in effort and implementation, as is the case with any changes made to standards.

Michael Johnson - Michael Johnson On Behalf of: Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer No

Document Name

Comment

PG&E will not comment on costs that have not been analyzed, there are too many factors that will go into this question.

Likes 0

Dislikes 0

Response

Thank you for your comments.

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer No

Document Name

Comment

Reclamation identifies that more information is needed to adequately assess the cost effectiveness of the proposed approach.	
Likes	0
Dislikes	0
Response	
Thank you for your comments.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	No
Document Name	
Comment	
See FirstEnergy's comments above.	
Likes	0
Dislikes	0
Response	
Thank you for your comments.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	No
Document Name	
Comment	

There will be costs associated with adding new software/technology and upgrading legacy equipment.	
Likes	0
Dislikes	0
Response	
The DT understands that implementing changes in the standard may incur costs in effort and implementation, as is the case with any changes made to standards. The proposed changes are suitable given the necessity to protect the reliability of BES Cyber Systems against compromise.	
Rebika Yitna - Rebika Yitna On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - Rebika Yitna	
Answer	No
Document Name	
Comment	
It cannot be determined at this time if the language of CIP-003-11 addresses the issues in a cost effective manner.	
Likes	0
Dislikes	0
Response	
Thank you for your comments.	
Ellese Murphy - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Duke Energy supports the revisions and does not have any concerns regarding the cost effectiveness.	

Likes	0
Dislikes	0
Response	
Thank you for your comments.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
James Keele - Entergy - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Carver Powers - Utility Services, Inc. - 4	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nick Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name TVA RBB	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Alan Kloster - Alan Kloster On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	

Answer	Yes
Document Name	
Comment	
Likes 1	Lincoln Electric System, 1, Johnson Josh
Dislikes 0	
Response	
Andrew Smith - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Robert Follini - Avista - Avista Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC CIP	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Karen Artola - CPS Energy - 1,3,5 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Matt Carden - Southern Company - Southern Company Services, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Tyler Schwendiman - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Marvin Johnson - DTE Energy - Detroit Edison Company - 3	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Robert Kerrigan - Los Angeles Department of Water and Power - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Fausto Serratos - Los Angeles Department of Water and Power - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Erik Gustafson - PNM Resources - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Ijad Dewan - Hydro One Networks, Inc. - 1 - NPCC	
Answer	Yes
Document Name	

Comment	
Likes	0
Dislikes	0
Response	
Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO, Group Name Manitoba Hydro Group	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Michael Moltane - International Transmission Company Holdings Corporation - 1	
Answer	
Document Name	
Comment	
No comment	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	
Document Name	
Comment	
Ameren has no comment on the cost effectiveness of the project.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	

Document Name	
Comment	
We have no comments on the cost-effectiveness of CIP-003-11. We will note that the cost effectiveness of CIP-003-12 was not asked in this comment form.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments.	
Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments	
Answer	
Document Name	
Comment	
Black Hills Corporation will not comment on cost effectiveness.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	
Document Name	
Comment	

CEHE does not comment on cost.

Likes 0

Dislikes 0

Response

Thank you for your comments.

Richard Vendetti - NextEra Energy - 5

Answer

Document Name

Comment

NEE does not comment on cost.

Likes 0

Dislikes 0

Response

Thank you for your comments.

5. Provide any additional comments on the standard and technical rationale for the DT to consider, if desired.

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Document Name

Comment

FirstEnergy thanks the DT for their work on these drafts but requests an increase in the implementation plan’s timeline to ensure efficient and manageable protection of the Bulk Electric System.

Likes 0

Dislikes 0

Response

Thank you for the comment. The drafting team has kept 36 months in the Implementation Plan with one change for Attachment 1 Section 3.1.2.

Ellese Murphy - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF

Answer	
Document Name	
Comment	
Duke Energy supports EEI comments.	
Likes 0	
Dislikes 0	

Response

Thank you for your comment, please see response to EEI.

Fausto Serratos - Los Angeles Department of Water and Power - 3

Answer	
Document Name	
Comment	
CIP-003-11 references “Technical Rationale for Reliability Standard CIP-003-11 – Low Impact BES Cyber Security Criteria Revisions”. We recommend the following sentences be reviewed:	
<ol style="list-style-type: none"> 1) On page 1 of the Technical Rationale, please note that the following is not a complete sentence: “Specifically, the degrees of risk presented by various facilities that house the low impact BES Cyber Assets and report on whether the low impact criteria should be modified.” 2) On page 6 of the Technical Rationale, under Section 3.1.3, says “(allowing, establishing, gaining)” after “permitting”. It is recommended that this phrase in the parentheses should just be deleted. It is unnecessary and confusing, given that these other words do not appear in the standard. 	
Likes 0	

Dislikes	0
Response	
Thank you for your comments, the team has addressed both of these issues in the draft TR.	
Robert Kerrigan - Los Angeles Department of Water and Power - 5	
Answer	
Document Name	
Comment	
<p>Comments: CIP-003-11 references “Technical Rationale for Reliability Standard CIP-003-11 – Low Impact BES Cyber Security Criteria Revisions”. We recommend the following sentences be reviewed:</p> <p>1) On page 1 of the Technical Rationale, please note that the following is not a complete sentence: “Specifically, the degrees of risk presented by various facilities that house the low impact BES Cyber Assets and report on whether the low impact criteria should be modified.”</p> <p>2) On page 6 of the Technical Rationale, under Section 3.1.3, says “(allowing, establishing, gaining)” after “permitting”. It is recommended that this phrase in the parentheses should just be deleted. It is unnecessary and confusing, given that these other words do not appear in the standard.</p> <p>The DT created a CIP-003-12 standard, CIP-003-12 implementation plan and a summary of changes document for this posting. Please review these files prior to answering the following questions.</p>	
Likes	0
Dislikes	0
Response	
Thank you for your comments, the team has addressed both of these issues in the draft TR.	
Richard Vendetti - NextEra Energy - 5	

Answer	
Document Name	
Comment	
NEE supports EEI's comments: "The DT created a CIP-003-12 standard, CIP-003-12 implementation plan and a summary of changes document for this posting. Please review these files prior to answering the following questions."	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment, please see response to EEI.	
Michael Johnson - Michael Johnson On Behalf of: Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	
Document Name	
Comment	
The rationale comments that jump host for low sites is not required, but in reality, there are limited ways to meet the requirements stated here other than using jump hosts. Since it is required in CIP 005, it should be here too.	
The DT created a CIP-003-12 standard, CIP-003-12 implementation plan and a summary of changes document for this posting. Please review these files prior to answering the following questions.	
Likes 0	
Dislikes 0	
Response	

Thank you for the comment. The drafting team’s intent was not to prescribe the need for a jump host and accommodate alternative methods for complying with the additional protections outlined in the SAR.

Matt Carden - Southern Company - Southern Company Services, Inc. - 1

Answer

Document Name

Comment

Southern Company is in agreement with the EEI comments

Likes 0

Dislikes 0

Response

Thank you for your comment, please see response to EEI.

Kinte Whitehead - Exelon - 3

Answer

Document Name

Comment

Exelon is aligned with EEI in response to this question.

Likes 0

Dislikes 0

Response

Thank you for your comment, please see response to EEI.

Daniel Gacek - Exelon - 1

Answer	
Document Name	
Comment	
Exelon supports the comments submitted by the EEI for this question.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment, please see response to EEI.	
Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments	
Answer	
Document Name	
Comment	
Black Hills Corporation is concerned about having multiple CIP-003 projects and multiple virtualization projects occurring simultaneously as it is becoming difficult to maintain oversight of the changes to a degree that allows sufficient review. In addition, how is NERC ensuring that the direction of these multiple projects maintain alignment?	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The drafting team has posted a draft CIP-003-11 that is this teams changes on top of NERC board approved CIP-003-10 (virtualization changes). This is also the path forward for the Implementation Plan. This version will contain all changes to date in one version.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC CIP	

Answer	
Document Name	
Comment	
No Comments	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	
Document Name	
Comment	
The DT created a CIP-003-12 standard, CIP-003-12 implementation plan and a summary of changes document for this posting. Please review these files prior to answering the following questions.	
Likes 1	Lincoln Electric System, 1, Johnson Josh
Dislikes 0	
Response	
Thank you for your response.	
Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nick Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh	
Answer	
Document Name	

Comment

NST considers it unfortunate that industry has been afforded only a single, up or down vote on two distinctly different implementation plans, one for CIP-003-11 and one for CIP-003-12. Our "Negative" vote reflects our concerns about only the "-12" implementation plan. Given the opportunity to vote on just the "-11" implementation plan, our vote would have been "Affirmative."

Likes 0

Dislikes 0

Response

Thank you for your comment. The drafting team has posted a draft CIP-003-11 that is this teams changes on top of NERC board approved CIP-003-10 (virtualization changes). This is also the path forward for the Implementation Plan. This version will contain all changes to date in one version.

Carver Powers - Utility Services, Inc. - 4

Answer

Document Name

Comment

In the Technical Rationale the information in figure 4 should be included in the diagram for figure 1 and figure 2. Figure 4 provides confusion because it does not meet the criteria listed in 3.1.1 and 3.1.2. Recommend that the Technical Rationale clearly states for each diagram if they are depicting compliance with only an individual subsection of the requirement.

In figure 5 can the jump host now be part of an associated data center for a Control Center?

Likes 0

Dislikes 0

Response

[Thank you for your comments, the drafting team has made edits to the Technical Rationale and Figure 5.]

Commented [AO12]: I added this based on the work the team did, any additional details to include?

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	
Document Name	
Comment	
The NAGF has no additional comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your response.	
Jeffrey Streifling - NB Power Corporation - 1	
Answer	
Document Name	
Comment	
We are confused with the foundation starting with CIP-003-9 which was modified based upon project 2016-02 virtualization creating CIP-003-10 which has not been approved by FERC. CIP-003-11 changes do not appear to align or clearly track the changes in the last approved CIP-003-9 language. CIP-003-12 attempts to combine CIP-003-10 and the proposed CIP-003-11 but does not seem to capture all changes. We recommend merging the proposed language in CIP-003-11 and CIP-003-12, merge the implementation plans, and repost after FERC approves CIP-003-10 in a new ballot.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. The drafting team has posted a draft CIP-003-11 that is this teams changes on top of NERC board approved CIP-003-10 (virtualization changes). This is also the path forward for the Implementation Plan. This version will contain all changes to date in one version.

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer

Document Name

Comment

We are confused with the foundation starting with CIP-003-9 which was modified based upon project 2016-02 virtualization creating CIP-003-10 which has not been approved by FERC. CIP-003-11 changes do not appear to align or clearly track the changes in the last approved CIP-003-9 language. CIP-003-12 attempts to combine CIP-003-10 and the proposed CIP-003-11 but does not seem to capture all changes. We recommend merging the proposed language in CIP-003-11 and CIP-003-12, marge the implementation plans, and repost after FERC approves CIP-003-10 in a new ballot.

Likes 0

Dislikes 0

Response

Thank you for your comment. The drafting team has posted a draft CIP-003-11 that is this teams changes on top of NERC board approved CIP-003-10 (virtualization changes). This is also the path forward for the Implementation Plan. This version will contain all changes to date in one version.

Leshel Hutchings - AEP - 3

Answer

Document Name

Comment

[VCA is used in the document but never defined as Virtual Cyber Asset anywhere, if an end user needs to look up acronym, it would be useful to define VCA in the Glossary of Terms.]

Likes 0

Dislikes 0

Response

Thank you for your comment. Virtual Cyber Asset was a defined term developed under Project 2016-02 and was board approved in May 2024. The team has spelled out Virtual Cyber Asset during its first use in the standard prior to using the acronym. NERC has identified the problem of glossary terms only being included in the Glossary of Terms after FERC approval and will be adding a new section titled "Pending Regulatory Approval" where terms can be included prior to FERC approval.

Selene Willis - Edison International - Southern California Edison Company - 5

Answer

Document Name

Comment

See comments from EEI

Likes 0

Dislikes 0

Response

Thank you for your comment, please see response to EEI.

David Jendras Sr - Ameren - Ameren Services - 3

Answer

Document Name

Comment

Commented [AO13]: Alison look into when terms get into glossary and add response

None.

Likes 0

Dislikes 0

Response

Michael Moltane - International Transmission Company Holdings Corporation - 1

Answer

Document Name

Comment

Support EEI

Likes 0

Dislikes 0

Response

Thank you for your comment, please see response to EEI.

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Document Name

Comment

OPG supports NPCC Regional Standards Committee's comments.

Likes 0

Dislikes	0
Response	
Thank you for your comment, please see response to NPCC.	
Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez	
Answer	
Document Name	
Comment	
<p>• Cancel all changes to CIP-003-9 and the SAR should be reviewed and recommendations made to change the criterion for Medium impact based on objective and measurable criteria rather than expect responsible entities to acquiesce to the recommendation by the LICRT to change all low impact requirements resulting in unreasonable technological and labor costs.</p>	
Likes	0
Dislikes	0
Response	
Thank you for your comments. The DT understands this is a new requirement for lows, however overall there are more requirements associated with mediums than there are lows (please see the low impact report). The SDT is only allowed to work within the constraints of the SAR and does not have the authority to cancel all changes to CIP-003-9.	

The DT created a CIP-003-12 standard, CIP-003-12 implementation plan and a summary of changes document for this posting. Please review these files prior to answering this question.

6. Do you have any concerns in the way CIP-003-10 (Project 2016-02 changes) and CIP-003-11 (Project 2023-04 changes) were combined to create standard CIP-003-12?

David Jendras Sr - Ameren - Ameren Services - 3

Answer	No
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Document Name	
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Comment

EACMS and PCAs have previously not been applicable for Low-Impact CIP Assets. However, SCI could be introducing an opportunity for EACMS and PCA requirements. Would a centralized engineering or cyber tool suite that is only used to support Low-Impact CIP assets from outside the ESP qualify as a SCI? If so, would EACMS or PCA requirements then apply to such a system even if such protections are not required for the BCS? Ameren suggests adding a statement to the SCI definition clarifying which requirements are for low, medium, and high impact BCS or SCI.

Likes	0
-------	---

Dislikes	0
Response	
Thank you for your comment. The SDT asserts that shared Cyber Assets that support ONLY ONE impact category, such as low, do not meet the definition of SCI. As EACMS and PCAs are only associated with ESP's for medium and high impact BCS and if they are supported on the same SCI along with an engineering or cyber tool VCA that itself is only used for lows, then it would be SCI as it is supporting VCAs of differing impact levels (or associated with differing impact levels). The SCI itself would be subject to CIP requirements that have "SCI supporting..." in their applicability, and the individual VCAs would be subject to the requirements based on what the VCA is.	
Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nick Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh	
Answer	No
Document Name	
Comment	
NST has no concerns about the content of proposed CIP-003-12. We do, however, have concerns about the implementation plan, as explained below.	
Likes	0
Dislikes	0
Response	
Thank you for your comment.	
Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	No
Document Name	
Comment	
CEHE supports the comments as submitted by EEI.	

EEI has reviewed the redline of CIP-003-9 to CIP-003-12 and understands that the revisions make conforming changes in alignment with Project 2016-02 and is supportive of the alignment.

Likes 0

Dislikes 0

Response

Thank you for your comment. See response to EEI.

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer No

Document Name

Comment

Tacoma Power has no concerns.

Likes 0

Dislikes 0

Response

Thank you for your support.

Carey Salisbury - Santee Cooper - 5, Group Name Santee Cooper

Answer No

Document Name

Comment

Likes	0
Dislikes	0
Response	
Thank you for your support.	
James Keele - Entergy - 3	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC

Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Thank you for your support.

Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name TVA RBB

Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Thank you for your support.

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer	No
Document Name	

Comment	
Likes 1	Lincoln Electric System, 1, Johnson Josh
Dislikes 0	
Response	
Thank you for your support.	
Robert Follini - Avista - Avista Corporation - 3	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC CIP	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Karen Artola - CPS Energy - 1,3,5 - Texas RE	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	No
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Tyler Schwendiman - ReliabilityFirst - 10	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Erik Gustafson - PNM Resources - 1,3 - WECC,Texas RE	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6	
Answer	No
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Rebika Yitna - Rebika Yitna On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - Rebika Yitna	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO, Group Name Manitoba Hydro Group	

Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez	
Answer	Yes
Document Name	
Comment	
<p>• Expecting responsible entities to understand the unintended consequences of multiple changes to the same standard without any implementation time or settling time is unreasonable. Suggest following precedent set during changes to CIP-015 by making suggested changes in a new standard such as CIP-016, where CIP-003 would remain unchanged and requirements for low impact assets would be captured in the new standard. We do not agree that any changes should be made for Low Impact, but if forced to do so, the recommendation is to create a new standard.</p> <p>• Recommend canceling all changes to CIP-003-9 and the SAR should be reviewed and recommendations made to change the criterion for Medium impact based on objective and measurable criteria rather than expect responsible entities to acquiesce to the recommendation by the LICRT to change all low impact requirements.</p>	
Likes 0	
Dislikes 0	
Response	

The SDT is completing its scope from the approved SAR as assigned by the Standards Committee. As to a new standard, the SDT asserts that from the beginning of V5, “low only” entities have been able to get all of their requirements from CIP-002 and CIP-003 (with CIP-012 if a Control Center). For lows, CIP-003 contains a requirement for a cyber security plan. The specifics of what must be included in that plan are in Attachment 1 and this SAR is adding 3 items to 1 of the 5 required sections of that plan. The SDT asserts there is not justification for a reorganization of every entity’s low impact CIP programs and documentation by splitting the sections of the required cyber security plan for lows into multiple different standards.

Selene Willis - Edison International - Southern California Edison Company - 5

Answer	Yes
Document Name	
Comment	
See comments from EEI	
Likes	0
Dislikes	0
Response	
Thank you for your comment, please see response to EEI.	

Michael Moltane - International Transmission Company Holdings Corporation - 1

Answer	Yes
Document Name	
Comment	
Support EEI	
Likes	0
Dislikes	0

Response	
Thank you for your comment, please see response to EEI.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
OPG supports NPCC Regional Standards Committee’s comments.	
Likes	0
Dislikes	0
Response	
Thank you for your comment, please see response to NPCC.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
WEC Energy Group supports the comments of EEI.	
Likes	0
Dislikes	0
Response	
Thank you for your comment, please see response to EEI.	
Leshel Hutchings - AEP - 3	

Answer	Yes
Document Name	
Comment	
<p>AEP has reviewed the redlines and concur with EEI's comments below understands that the revisions make conforming changes in alignment with Project 2016-02 and is supportive of the alignment. EEI suggests the following clarification, which we feel is non-substantive and in alignment with the intention of the DT, in Attachment 1:</p> <p>Responsible Entities with multiple-impact BCS ratings can utilize policies, procedures, and processes for their high or medium impact BCS to fulfill the sections for the development of low impact cyber security plan(s). Responsible Entities with Shared Cyber Infrastructure (SCI) that supports a low impact BCS can utilize policies, procedures, and processes for their SCI supporting high or medium impact BCS to fulfill the sections for the development of low impact cyber security plan(s). Each Responsible Entity can develop a cyber security plan(s) either by individual asset or groups of assets.</p> <p>The defined term SCI applies when it hosts or provides storage resources required for system functionality for one or more Virtual Cyber Assets (VCAs) and one or more VCAs that are not included in, or associated with, BCS of the same impact categorization. Where a higher level of controls is applied to the SCI supporting low impact BCS, Entities should be able to use them to satisfy the requirements applicable to SCI in CIP-003-12, Attachment 1.</p>	
Likes	0
Dislikes	0
Response	
Thank you for your comment, please see response to EEI.	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	

Dominion Energy would like clarification on the SCI and the phrase from the technical rationale document for Project 2021-02, “However, network switches and other hardware that does enforce an ESP” specifically clarification on “other hardware”. Does this term include the firewall that is creating the ESP?

Likes 0

Dislikes 0

Response

Thank you for your comment. Unfortunately, this is a 2016-02 question regarding CIP-005 and therefore not within the scope of 2023-04’s scope to respond.

Jeffrey Streifling - NB Power Corporation - 1

Answer Yes

Document Name

Comment

It’s very confusing to review two separate versions of the same standard at the same time. Preferably one version should be reviewed at a time. Also having so many different projects working on one standard at the same time creates confusion.

We are confused with the foundation starting with CIP-003-9 which was modified based upon project 2016-02 virtualization creating CIP-003-10 which has not been approved by FERC. CIP-003-11 changes do not appear to align or clearly track the changes in the last approved CIP-003-9 language. CIP-003-12 attempts to combine CIP-003-10 and the proposed CIP-003-11 but does not seem to capture all changes. TFIST recommends merging the proposed language in CIP-003-11 and CIP-003-12, merge the implementation plans, and repost after FERC approves CIP-003-10 in a new ballot.

Additionally, we have concerns with the use of the SCI term and the possibility the EACMS, PACS at High or Medium Facilities may also have to comply with CIP-003-12 requirements which may be different than High and Medium requirements. We observed that SCI devices at High or Medium locations may be subject to documenting all inbound communication at the location which could be a

substantial burden at a High and Medium location which would include corporate and non-BCS communications. It is proposed that SCI devices be high water marked to High/Medium or Low requirements.

Likes 0

Dislikes 0

Response

Thank you for your comment. Please see response to similar comment under NPCC RSC.

Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

EEI has reviewed the redline of CIP-003-9 to CIP-003-12 and understands that the revisions make conforming changes in alignment with Project 2016-02 and is supportive of the alignment. EEI suggests the following clarification, which we feel is non-substantive and in alignment with the intention of the DT, in Attachment 1:

Responsible Entities with multiple-impact BCS ratings can utilize policies, procedures, and processes for their high or medium impact BCS to fulfill the sections for the development of low impact cyber security plan(s). **Responsible Entities with Shared Cyber Infrastructure (SCI) that supports a low impact BCS can utilize policies, procedures, and processes for their SCI supporting high or medium impact BCS to fulfill the sections for the development of low impact cyber security plan(s).** Each Responsible Entity can develop a cyber security plan(s) either by individual asset or groups of assets.

The defined term SCI applies when it hosts or provides storage resources required for system functionality for one or more Virtual Cyber Assets (VCAs) and one or more VCAs that are not included in, or associated with, BCS of the same impact categorization. Where a higher level of controls is applied to the SCI supporting low impact BCS, Entities should be able to use them to satisfy the requirements applicable to SCI in CIP-003-12, Attachment 1.

Likes 0

Dislikes 0

Response	
Thank you for your comments. The SDT agrees with the comments concerning SCI and the intent for such SCI that is already meeting high or medium impact requirements for the SCI itself should suffice for also meeting the CIP-003 low impact cyber security plan requirements. Therefore the SDT has modified CIP-003, Attachment 1 to that effect by specifically adding SCI to the paragraph in the header of Attachment 1.	
TRACEY JOHNSON - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Southern Indiana Gas and Electric d/b/a CenterPoint Energy Indiana South (SIGE) has concerns that having multiple versions of the standard simultaneously working on modifications causing confusion. Without having approved versions prior to making proposed revisions seems a bit premature.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to similar comment under NPCC RSC.	
Alan Kloster - Alan Kloster On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Alan Kloster	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute for Question #6.	
Likes	0

Dislikes	0
Response	
Thank you for your comment. Please see response to EEI.	
Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments	
Answer	Yes
Document Name	
Comment	
<p>Black Hills Corporation agrees with EEI. Black Hills Corporation has reviewed the redline of CIP-003-9 to CIP-003-12 and understands that the revisions make conforming changes in alignment with Project 2016-02 and is supportive of the alignment. EEI suggests the following clarification, which we feel is non-substantive and in alignment with the intention of the DT, in Attachment 1:</p> <p>Responsible Entities with multiple-impact BCS ratings can utilize policies, procedures, and processes for their high or medium impact BCS to fulfill the sections for the development of low impact cyber security plan(s). Responsible Entities with Shared Cyber Infrastructure (SCI) that supports a low impact BCS can utilize policies, procedures, and processes for their SCI supporting high or medium impact BCS to fulfill the sections for the development of low impact cyber security plan(s). Each Responsible Entity can develop a cyber security plan(s) either by individual asset or groups of assets.</p> <p>The defined term SCI applies when it hosts or provides storage resources required for system functionality for one or more Virtual Cyber Assets (VCAs) and one or more VCAs that are not included in, or associated with, BCS of the same impact categorization. Where a higher level of controls is applied to the SCI supporting low impact BCS, Entities should be able to use them to satisfy the requirements applicable to SCI in CIP-003-12, Attachment 1.</p>	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to EEI.	
Daniel Gacek - Exelon - 1	

Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by the EEI for this question.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon is aligned with EEI in response to this question.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see response to EEI.	
Michael Johnson - Michael Johnson On Behalf of: Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	

Comment

Comments and ballots on CIP-003-11 and 12 are confusing> To avoid complications, the others should be abandoned and only one should be released.

Likes 0

Dislikes 0

Response

Thank you for your comment. Please see response to similar comment under NPCC RSC.

Richard Vendetti - NextEra Energy - 5

Answer Yes

Document Name

Comment

NEE supports EEI’s comments: “EEI has reviewed the redline of CIP-003-9 to CIP-003-12 and understands that the revisions make conforming changes in alignment with Project 2016-02 and is supportive of the alignment. EEI suggests the following clarification, which we feel is non-substantive and in alignment with the intention of the DT, in Attachment 1:

Responsible Entities with multiple-impact BCS ratings can utilize policies, procedures, and processes for their high or medium impact BCS to fulfill the sections for the development of low impact cyber security plan(s). **Responsible Entities with Shared Cyber Infrastructure (SCI) that supports a low impact BCS can utilize policies, procedures, and processes for their SCI supporting high or medium impact BCS to fulfill the sections for the development of low impact cyber security plan(s).** Each Responsible Entity can develop a cyber security plan(s) either by individual asset or groups of assets.

The defined term SCI applies when it hosts or provides storage resources required for system functionality for one or more Virtual Cyber Assets (VCAs) and one or more VCAs that are not included in, or associated with, BCS of the same impact categorization. Where a higher

level of controls is applied to the SCI supporting low impact BCS, Entities should be able to use them to satisfy the requirements applicable to SCI in CIP-003-12, Attachment 1.”

Likes 0

Dislikes 0

Response

Thank you for your comment. Please see response to EEI.

Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 5

Answer Yes

Document Name

Comment

Supporting EEI comments

Likes 0

Dislikes 0

Response

Thank you for your comment. Please see response to EEI.

Alison Nickells - NiSource - Northern Indiana Public Service Co. - 1 - RF

Answer Yes

Document Name

Comment

Combining multiple versions of a Reliability Standard Under Development into one (1) ballot is proving to be overly onerous. It would be more beneficial if CIP-003-11 and CIP-003-12 language were combined into one (1) version of the Standard to be evaluated and balloted upon.

Likes 0

Dislikes 0

Response

Thank you for your comment. Please see response to similar comment under NPCC RSC.

Matt Carden - Southern Company - Southern Company Services, Inc. - 1

Answer Yes

Document Name

Comment

Southern Company is in agreement with the EEI comments:

EEI has reviewed the redline of CIP-003-9 to CIP-003-12 and understands that the revisions make conforming changes in alignment with Project 2016-02 and is supportive of the alignment. EEI suggests the following clarification, which we feel is non-substantive and in alignment with the intention of the DT, in Attachment 1:

Responsible Entities with multiple-impact BCS ratings can utilize policies, procedures, and processes for their high or medium impact BCS to fulfill the sections for the development of low impact cyber security plan(s). **Responsible Entities with Shared Cyber Infrastructure (SCI) that supports a low impact BCS can utilize policies, procedures, and processes for their SCI supporting high or medium impact BCS to fulfill the sections for the development of low impact cyber security plan(s).** Each Responsible Entity can develop a cyber security plan(s) either by individual asset or groups of assets.

The defined term SCI applies when it hosts or provides storage resources required for system functionality for one or more Virtual Cyber Assets (VCAs) and one or more VCAs that are not included in, or associated with, BCS of the same impact categorization. Where a higher level of controls is applied to the SCI supporting low impact BCS, Entities should be able to use them to satisfy the requirements applicable to SCI in CIP-003-12, Attachment 1.

Likes 0

Dislikes 0

Response

Thank you for your comments. Please see response to EEI.

Robert Kerrigan - Los Angeles Department of Water and Power - 5

Answer Yes

Document Name

Comment

Comments: CIP-003-12 seems better developed than CIP-003-11, in that it includes more concepts. The main comment about CIP-003-12 is that it includes two terms, "VCA" and "SCI", that are new per virtualization project – will the terms be added into the standard itself or will the DT ensure they be added to the NERC glossary of terms?

Likes 0

Dislikes 0

Response

Thank you for your comment. NERC has identified the problem of glossary terms only being included in the Glossary of Terms after FERC approval and will be adding a new section titled "Pending Regulatory Approval" where terms can be included prior to FERC approval. The implementation plan for this project will be modified to make it dependent on the final approval of that version of CIP-003.

Fausto Serratos - Los Angeles Department of Water and Power - 3

Answer Yes

Document Name	
Comment	
CIP-003-12 seems better developed than CIP-003-11, in that it includes more concepts. The main comment about CIP-003-12 is that it includes two terms, “VCA” and “SCI”, that are new per virtualization project – will the terms be added into the standard itself or will the DT ensure they be added to the NERC glossary of terms?	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Those glossary terms were created by Project 2016-02 and are Board approved and will be added to the NERC glossary. The implementation plan for this project will be modified to make it dependent on the final approval of that version of CIP-003 and its subsequent modifications to the NERC glossary.	
Ijad Dewan - Hydro One Networks, Inc. - 1 - NPCC	
Answer	Yes
Document Name	
Comment	
It’s very confusing to review two separate versions of the same standard at the same time. Preferably one version should be reviewed at a time. Also having so many different projects working on one standard at the same time creates confusion.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see response to similar comment under NPCC RSC.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	

Answer	Yes
Document Name	
Comment	
See FirstEnergy's response to Q1.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment, please see response in Q1.	
Ellese Murphy - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Duke Energy supports the non-substantive revisions proposed by EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment, please see response to EEI.	
Carver Powers - Utility Services, Inc. - 4	
Answer	Yes
Document Name	

Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Andrew Smith - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Thank you for your response.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Marvin Johnson - DTE Energy - Detroit Edison Company - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your response.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	
Document Name	
Comment	

It's very confusing to review two separate versions of the same standard at the same time. Preferably one version should be reviewed at a time. Also having so many different projects working on one standard at the same time creates confusion.

We are confused with the foundation starting with CIP-003-9 which was modified based upon project 2016-02 virtualization creating CIP-003-10 which has not been approved by FERC. CIP-003-11 changes do not appear to align or clearly track the changes in the last approved CIP-003-9 language. CIP-003-12 attempts to combine CIP-003-10 and the proposed CIP-003-11 but does not seem to capture all changes. TFIST recommends merging the proposed language in CIP-003-11 and CIP-003-12, merge the implementation plans, and repost after FERC approves CIP-003-10 in a new ballot.

Additionally, we have concerns with the use of the SCI term and the possibility the EACMS, PACS at High or Medium Facilities may also have to comply with CIP-003-12 requirements which may be different than High and Medium requirements. We observed that SCI devices at High or Medium locations may be subject to documenting all inbound communication at the location which could be a substantial burden at a High and Medium location which would include corporate and non-BCS communications. It is proposed that SCI devices be high water marked to High/Medium or Low requirements.

Likes	0
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Dislikes	0
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Response

Thank you for the comments. The SDT agrees concerning the multiple simultaneous versions issue. It was driven by the potential for very close proximity in time filing of this and 2016-02 versions of CIP-003 and uncertainty as to future order of regulatory approvals and being prepared for any eventuality. However, the SDT now plans for this version of CIP-003 to be filed at a later date after a subsequent posting for approval of the entire package including implementation plan and is thus consolidating into a single version and implementation plan for that next posting. That version will be labelled as CIP-003-11 and it will consist of this DT's changes on top of the Board approved CIP-003-10 along with a simplified implementation plan.

The SDT agrees with the comments concerning SCI. We note that since SCI supports systems of differing impact levels, whatever the highest impact category is of the supported systems will bring the SCI in under the “SCI supporting an Applicable System in the Part” applicability throughout the CIP standards, thus effectively high-watermarking the SCI. We agree the intent for such SCI that is already meeting high or medium impact requirements for the SCI itself should suffice for also meeting the CIP-003 low impact cyber security plan requirements. Therefore the SDT has modified CIP-003, Attachment 1 to that effect by specifically adding SCI to the paragraph in the header of Attachment 1.

Summary Response to Question 7:

The drafting team is putting forward only one standard and Implementation plan in the next comment and ballot period, which will be CIP-003-11 and includes this team changes on top of the virtualization changes made in CIP-003-10. This proposed CIP-003-11 Implementation plan would allow entities to have, at a minimum, the 24 months that was established by Project 2016-02 for the CIP-003-10 revisions. Likewise, entities would be allowed, at least, the 36 months to comply with the CIP-003-11 changes, as previously proposed by the Project 2023-04 drafting team.

The DT created a CIP-003-12 standard, CIP-003-12 implementation plan and a summary of changes document for this posting. Please review these files prior to answering this question.

7. Do you have any concerns in the CIP-003-12 implementation plan that should be addressed?

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer	No
Document Name	
Comment	

Tacoma Power has no concerns.

Likes 0

Dislikes 0

Response

Richard Vendetti - NextEra Energy - 5

Answer No

Document Name

Comment

NEE supports EEI's comments: "EEI supports the CIP-003-12 implementation plan."

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 5

Answer No

Document Name

Comment

NA.

Likes	0
Dislikes	0
Response	
<p>Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC</p>	
Answer	No
Document Name	
Comment	
<p>SMUD agrees with the comments submitted by the MRO NSRF.</p>	
Likes	0
Dislikes	0
Response	
<p>Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF</p>	
Answer	No
Document Name	
Comment	
<p>The NAGF agrees with the proposed CIP-003-12 implementation plan.</p>	
Likes	0

Dislikes	0
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Rebika Yitna - Rebika Yitna On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - Rebika Yitna	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6	
Answer	No

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Fausto Serratos - Los Angeles Department of Water and Power - 3	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Erik Gustafson - PNM Resources - 1,3 - WECC,Texas RE	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Robert Kerrigan - Los Angeles Department of Water and Power - 5	
Answer	No
Document Name	

Comment	
Likes	0
Dislikes	0
Response	
Tyler Schwendiman - ReliabilityFirst - 10	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Karen Artola - CPS Energy - 1,3,5 - Texas RE	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC CIP	
Answer	No
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Robert Follini - Avista - Avista Corporation - 3	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name TVA RBB	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

David Jendras Sr - Ameren - Ameren Services - 3	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
James Keele - Entergy - 3	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Carey Salisbury - Santee Cooper - 5, Group Name Santee Cooper	
Answer	No
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO, Group Name Manitoba Hydro Group	
Answer	Yes
Document Name	
Comment	
<p>Manitoba Hydro appreciates the standard drafting team’s intent that the timeline set forth for CIP-003-12 be the later of 36-months from CIP-003-11 approval or 24-months from CIP-003-12 approval, giving entities at least 36-months of time to implement the changes. However, there is the possibility that CIP-003-11 does not receive governmental approval, and the version is “skipped” going straight to CIP-003-12. In this scenario, only 24-months of implementation would be afforded. This would not give entities enough time, especially if the standard changes require additional staff, hardware or architecture changes. Manitoba Hydro suggests that the implementation plan effective date for CIP-003-12 be revised to match CIP-003-11 and state that the standard become effective thirty-six (36) months after the effective date of the applicable governmental authority’s order approving Reliability Standard CIP-003-12.</p>	
Likes	0
Dislikes	0
Response	
Ellese Murphy - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	

Duke Energy supports EEI comments.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer Yes

Document Name

Comment

See FirstEnergy's response to Q3.

Likes 0

Dislikes 0

Response

Ijad Dewan - Hydro One Networks, Inc. - 1 - NPCC

Answer Yes

Document Name

Comment

When looking at implementation of plans of CIP-003-10, CIP-003-11, and CIP-003-12 it becomes confusing to decipher what is the actual effective date of CIP-003-12. There are too many dependencies involved.

Likes 0

Dislikes 0

Response

Matt Carden - Southern Company - Southern Company Services, Inc. - 1

Answer Yes

Document Name

Comment

Southern Company is in agreement with the EEI comments:

EEI is concerned about the proposed effective date for CIP-003-12. CIP-003-12 is the alignment of the Project 2023-04 changes with conforming changes from Project 2016-02 Virtualization, which is pending FERC approval. Given its pending approval, it is difficult to understand if the 24-month period would provide a shorter implementation timeframe than the 36-month period proposed for CIP-003-11. EEI supports a 36-month implementation period for the draft revisions and asks for that timeframe regardless of the version of CIP-003 approved.

Likes 0

Dislikes 0

Response

Alison Nickells - NiSource - Northern Indiana Public Service Co. - 1 - RF

Answer Yes

Document Name	
Comment	
With multiple versions of implementation plans as they pertain to the different versions of a Reliability Standard Under Development, it is challenging to discern the applicable timelines and the organizational impacts of the implementation	
Likes 0	
Dislikes 0	
Response	
Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 5	
Answer	Yes
Document Name	
Comment	
Supporting EEI comments	
Likes 0	
Dislikes 0	
Response	
Michael Johnson - Michael Johnson On Behalf of: Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	

This should state 24 months after the implementation of CIP -003-11 not CIP 003-9. The way it is currently written, implementation would be required earlier than CIP-003-11.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer Yes

Document Name

Comment

Exelon is aligned with EEI in response to this question.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

Exelon supports the comments submitted by the EEI for this question.

Likes	0
Dislikes	0
Response	
Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments	
Answer	Yes
Document Name	
Comment	
<p>Black Hills Corporation agrees with EEI's comments: Black Hills Corporation is concerned about the proposed effective date for CIP-003-12. CIP-003-12 is the alignment of the Project 2023-04 changes with conforming changes from Project 2016-02 Virtualization, which is pending FERC approval. Given its pending approval, it is difficult to understand if the 24-month period would provide a shorter implementation timeframe than the 36-month period proposed for CIP-003-11. EEI supports a 36-month implementation period for the draft revisions and asks for that timeframe regardless of the version of CIP-003 approved.</p>	
Likes	0
Dislikes	0
Response	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	Yes
Document Name	
Comment	
<p>The NSRF appreciates the standard drafting team's intent that the timeline set forth for CIP-003-12 be the later of 36-months from CIP-003-11 approval or 24-months from CIP-003-12 approval, giving entities at least 36-months of time to implement the changes. However,</p>	

there is the possibility that CIP-003-11 does not receive governmental approval, and the version is “skipped” going straight to CIP-003-12. In this scenario, only 24-months of implementation would be afforded. This would not give entities enough time, especially if the standard changes require additional staff, hardware or architecture changes. The NSRF suggests that the implementation plan effective date for CIP-003-12 be revised to match CIP-003-11 and state that the standard become effective thirty-six (36) months after the effective date of the applicable governmental authority’s order approving Reliability Standard CIP-003-12.

Likes	1	Lincoln Electric System, 1, Johnson Josh
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Dislikes	0	
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Response

Alan Kloster - Alan Kloster On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Alan Kloster

Answer	Yes
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Document Name	
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Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute and MRO NSRF for Question #7.

Likes	0
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Dislikes	0
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Response

TRACEY JOHNSON - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer	Yes
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Document Name	
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Comment

Southern Indiana Gas and Electric d/b/a CenterPoint Energy Indiana South (SIGE) has the same concerns as addressed in question 6.

Likes 0

Dislikes 0

Response

Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

EEI is concerned about the proposed effective date for CIP-003-12. CIP-003-12 is the alignment of the Project 2023-04 changes with conforming changes from Project 2016-02 Virtualization, which is pending FERC approval. Given its pending approval, it is difficult to understand if the 24-month period would provide a shorter implementation timeframe than the 36-month period proposed for CIP-003-11. EEI supports a 36-month implementation period for the draft revisions and asks for that timeframe regardless of the version of CIP-003 approved.

Likes 0

Dislikes 0

Response

Roger Fradenburgh - Roger Fradenburgh On Behalf of: Nick Lauriat, Network and Security Technologies, 1; - Roger Fradenburgh

Answer Yes

Document Name

Comment

NST has the following two concerns about the CIP-003-12 implementation plan:

(1) We note the section, "Prerequisite Standards" lists only CIP-003-11. We believe it should also be necessary for CIP-003-10 to be approved before CIP-003-12 can become effective.

(2) We note the section, "Effective Date" identifies two possible scenarios (36 months after FERC approval of CIP-003-11 or 24 months after FERC approval of CIP-003-12) that seem to be based on an implicit assumption that by such time FERC approval is given to either Version 11 or Version 12, CIP-003-10 will have been previously approved. Although the NERC BoT has approved the "-10" version, it has not yet been approved by FERC, and NST believes this fact should be reflected in the current version of the "-12" implementation plan.

Likes 0

Dislikes 0

Response

Jeffrey Streifling - NB Power Corporation - 1

Answer Yes

Document Name

Comment

When looking at implementation of plans of CIP-003-10, CIP-003-11, and CIP-003-12 it becomes confusing to decipher what is the actual effective date of CIP-003-12. There are too many dependencies involved.

CIP-003-11 and CIP-003-12 implementation plan should be combined and repost after FERC approves CIP-003-10 in a new ballot. TFIST recommends only having one implementation timeframe and TFIST prefers 36-month timeframe.

Likes 0

Dislikes 0

Response	
Leshel Hutchings - AEP - 3	
Answer	Yes
Document Name	
Comment	
<p>AEP has the same concerns as EEI--concerned about the proposed effective date for CIP-003-12. CIP-003-12 is the alignment of the Project 2023-04 changes with conforming changes from Project 2016-02 Virtualization, which is pending FERC approval. Given its pending approval, it is difficult to understand if the 24-month period would provide a shorter implementation timeframe than the 36-month period proposed for CIP-003-11. EEI supports a 36-month implementation period for the draft revisions and asks for that timeframe regardless of the version of CIP-003 approved.</p>	
Likes	0
Dislikes	0
Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
<p>WEC Energy Group supports the comments of EEI.</p>	
Likes	0
Dislikes	0

Response	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
OPG supports NPCC Regional Standards Committee’s comments.	
Likes	0
Dislikes	0
Response	
Michael Moltane - International Transmission Company Holdings Corporation - 1	
Answer	Yes
Document Name	
Comment	
Support EEI	
Likes	0
Dislikes	0
Response	
Selene Willis - Edison International - Southern California Edison Company - 5	

Answer	Yes
Document Name	
Comment	
See comments from EEI	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez	
Answer	Yes
Document Name	
Comment	
• Expecting responsible entities to understand the unintended consequences of multiple changes to the same standard without any implementation time or settling time is unreasonable.	
Likes 0	
Dislikes 0	
Response	
Marvin Johnson - DTE Energy - Detroit Edison Company - 3	
Answer	Yes
Document Name	

Comment	
Likes	0
Dislikes	0
Response	
Andrew Smith - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Carver Powers - Utility Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE requests the SDT consider adding verbiage to the Initial Performance of Periodic Requirements section to include initial performance expectations for newly registered entities and for entities for which CIP-003 did not previously apply.	
Likes	0
Dislikes	0
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	

Document Name	
Comment	
	<p>When looking at implementation of plans of CIP-003-10, CIP-003-11, and CIP-003-12 it becomes confusing to decipher what is the actual effective date of CIP-003-12. There are too many dependencies involved.</p> <p>CIP-003-11 and CIP-003-12 implementation plan should be combined and repost after FERC approves CIP-003-10 in a new ballot. TFIST recommends only having one implementation timeframe and TFIST prefers 36-month timeframe.</p>
Likes	0
Dislikes	0
Response	
Chantal Mazza - Chantal Mazza On Behalf of: Junji Yamaguchi, Hydro-Quebec (HQ), 1, 5; - Chantal Mazza	
Answer	
Document Name	
Comment	
	<p>This comment applies to all questions :It's very confusing to review two separate versions of the same standard at the same time. Preferably one version should be reviewed at a time. Also having so many different projects working on one standard at the same time creates confusion.</p>
Likes	0
Dislikes	0
Response	

End of Report