

## Comment Report

**Project Name:** 2023-04 Modifications to CIP-003 | Draft 4  
**Comment Period Start Date:** 9/11/2024  
**Comment Period End Date:** 10/10/2024  
**Associated Ballots:** 2023-04 Modifications to CIP-003 CIP-003-A AB 4 ST  
2023-04 Modifications to CIP-003 Implementation Plan AB 4 OT

There were 47 sets of responses, including comments from approximately 102 different people from approximately 69 companies representing 7 of the Industry Segments as shown in the table on the following pages.

## **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 a 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. Do you have any concerns in the way Project 2023-04 made conforming changes to CIP-003-11 to align with virtualization changes in Project 2016-02?**
  
- 6. Provide any additional comments on the standard and technical rationale for the DT to consider, if desired.**

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
					Joshua Phillips	Southwest Power Pool	2	MRO
					Patrick Tuttle	Oklahoma Municipal Power Authority	4,5	MRO
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
ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,NPCC,RF,SERC,Texas RE,WECC	ACES Collaborators	Bob Soloman	Hoosier Energy Electric Cooperative	1	RF
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Jason Procniar	Buckeye Power, Inc.	4	RF

					Jennifer Bray	Arizona Electric Power Cooperative, Inc.	1,3,4,5	WECC
					Nikki Carson-Marquis	Minnkota Power Cooperative, Inc.	1	MRO
					Jennifer Bray	Arizona Electric Power Cooperative, Inc.	1,3,4,5	WECC
					Kylee Kropp	Sunflower Electric Power Corporation	1	MRO
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
Black Hills Corporation	Rachel Schuldt	6		Black Hills Corporation - All Segments	Travis Grablander	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
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 does not support this proposed language.

Lack of New Definitions

The standard contemplates new concepts for Low Impact BES Cyber Systems (LIBCS) but does not define what those concepts mean

3.1.2 and the Technical Rationale Makes Flawed Assumptions about Network Topology

FirstEnergy has long questioned the prevailing narrative from the SDT that the requirement from 3.1.2 is cost-effective and not overly burdensome.

Likes 0

Dislikes 0

**Response**

**Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** No

**Document Name**

**Comment**

BPA reiterates its comments from the previous draft.

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**

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

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p><b>CenterPoint Energy Houston Electric, LLC (CEHE)</b> has concerns that “User-initiated electronic access” is not clearly defined. This terminology is used in the NERC term Interactive Remote Access which more appropriately includes the term “person” in the definition. System to system access for support systems managing multiple sites typically utilize support accounts that could meet the vague description of “User-initiated electronic access”. This could enforce unnecessary requirements for systems that are already segmented from internet/corporate networks that monitor multiple sites. In section 3.1.3 of the technical rationale, the DT compares “user-initiated electronic access” to “CIP-005 Requirement R2 Interactive Remote Access”. Interactive Remote Access is clearly defined and includes the term “person”. We recommend clearly defining the term “user-initiated electronic access” and including the term “person”.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>TRACEY JOHNSON - Southern Indiana Gas and Electric Co. - 3,5,6 - RF</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>Southern Indiana Gas and Electric d/b/a CenterPoint Energy Indiana South (SIGE) has concerns that “User-initiated electronic access” is not clearly defined. This terminology is used in the NERC term Interactive Remote Access which more appropriately includes the term “person” in the definition. System to system access for support systems managing multiple sites typically utilize support accounts that could meet the vague description of “User-initiated electronic access”. This could enforce unnecessary requirements for systems that are already segmented from internet/corporate networks that monitor multiple sites. In section 3.1.3 of the technical rationale, the DT compares “user-initiated electronic access” to “CIP-005 Requirement R2 Interactive Remote Access”. Interactive Remote Access is clearly defined and includes the term “person”. We recommend clearly defining the term “user-initiated electronic access” and including the term “person”.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Jesus Sammy Alcaraz - Imperial Irrigation District - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	



Attachment 1 section 3.1 can be misleading specifically “one or more controls.” It can appear that only one of the subsections is required as oppose to all. It is recommended to add “one or more controls” to each subsection and have it removed from 3.1.

Likes 0

Dislikes 0

**Response**

**Jessica Cordero - Unisource - Tucson Electric Power Co. - 1**

**Answer** Yes

**Document Name**

**Comment**

TEPC supports the language proposed in CIP-003-11 Attachment 1.

Likes 0

Dislikes 0

**Response**

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

**Answer** Yes

**Document Name**

**Comment**

*The NAGF supports the language proposed in CIP-013-11 Attachment 1.*

Likes 0

Dislikes 0

**Response**

**Ellese Murphy - Ellese Murphy On Behalf of: John Sturgeon, Duke Energy , 5, 6, 1, 1; - Ellese Murphy**

**Answer** Yes

**Document Name**

**Comment**

Duke Energy supports the proposed language in CIP-003-11 Attachment 1.

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**

**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**

**Hillary Creurer - Allete - Minnesota Power, Inc. - 1**

**Answer**

Yes

**Document Name**

**Comment**

Minnesota Power supports MRO NSRF comments.

Likes 0

Dislikes 0

**Response**

**Allie Gavin - International Transmission Company Holdings Corporation - 1 - MRO,RF**

**Answer**

Yes

**Document Name**

**Comment**

ITC supports EEI's and NSRF's comments.

Likes 0

Dislikes 0

**Response**

**Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers**

**Answer**

Yes

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

**Hayden Maples - Hayden Maples 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; - Hayden Maples**

**Answer**

Yes

**Document Name**

**Comment**

Energy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 1

Likes 0

Dislikes 0

### Response

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

**Answer**

Yes

**Document Name**

**Comment**

MRO NSRF thanks the drafting team for both their fidelity to the SAR and explicitly providing for the option of protecting user authentication information to an authentication system in part 3.1.4. instead of only requiring protection all the way to the low impact asset. This facilitates the Attachment 1 lead-in statement allowing for the use of "policies, procedures, and processes for their high or medium impact BCS" to satisfy Section 3.

Likes 0

Dislikes 0

### Response

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

**Answer**

Yes

**Document Name**

**Comment**

Please see EEI comments

Likes 0

Dislikes 0

### Response

**Dwanique Spiller - Berkshire Hathaway - NV Energy - 5**

**Answer**

Yes

**Document Name**

**Comment**

NV Energy thanks the drafting team for both their fidelity to the SAR and explicitly providing for the option of protecting user authentication information to an authentication system in part 3.1.4. instead of only requiring protection all the way to the low impact asset. This facilitates the Attachment 1 lead-in statement allowing for the use of “policies, procedures, and processes for their high or medium impact BCS” to satisfy Section 3.

Likes 0

Dislikes 0

**Response**

**Matthew Nicklin - Southern Illinois Power Cooperative - 1,3,5 - SERC**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer**

Yes

**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**

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**

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

**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**

**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
<b>Response</b>	
<b>Donald Lock - Talen Generation, LLC - 5</b>	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Carver Powers - Utility Services, Inc. - 4</b>	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Karen Artola - CPS Energy - 1,3,5 - Texas RE</b>	
Answer	Yes
Document Name	
Comment	
Likes	0

Dislikes 0

**Response**

**Tyler Schwendiman - ReliabilityFirst - 10**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Gladys DeLaO - CPS Energy - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Patricia Lynch - NRG - NRG Energy, Inc. - 5**

**Answer**

Yes



<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Richard Vendetti - NextEra Energy - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Donna Wood - Tri-State G and T Association, Inc. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC CIP</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

<b>Response</b>	
<b>Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO, Group Name</b> Manitoba Hydro Group	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0

<b>Response</b>	
<b>Clay Walker - Clay Walker On Behalf of: Robert Hirschak, Cleco Corporation, 6, 5, 1, 3; - Clay Walker</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0

<b>Response</b>	
<b>Rachel Schuldt - Black Hills Corporation - 6, Group Name</b> Black Hills Corporation - All Segments	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0

<b>Response</b>	
<b>James Keele - Entergy - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

**Comment**

Likes 0

Dislikes 0

**Response****Kinte Whitehead - Exelon - 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****Mike Magruder - Avista - Avista Corporation - 1****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

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer Yes

Document Name

Comment

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

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

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.

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer No

Document Name

Comment

We are not clear on what the SDT is trying to say in the following:

From Section 4 of Attachment 2:

Section 3.1.4: documentation showing the ability to protect user authentication information for user-initiated electronic access applicable to Section 3.1.3 while in transit between the Cyber System outside the asset containing low impact BCS or SCI that supports a low impact BCS and

- The asset containing low impact BCS or SCI that supports a low impact BCS,

It seems that the bullet is an exact duplicate of the body of the explanation above the bullet? Is the SDT trying to cover communications between two (2) different LIBCS with this statement?

Likes 0

Dislikes 0

Response

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 the same concerns as addressed in question 1.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

CenterPoint Energy Houston Electric, LLC (CEHE) has the same concerns addressed in question 1.

Likes 0

Dislikes 0

### Response

**Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer**

No

**Document Name**

### Comment

BPA reiterates its comments from the previous draft.

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.

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

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

**Answer**

No

**Document Name**

### Comment

FirstEnergy does not support this proposed language.

Lack of New Definitions

The standard contemplates new concepts for Low Impact BES Cyber Systems (LIBCS) but does not define what those concepts mean

3.1.2 and the Technical Rationale Makes Flawed Assumptions about Network Topology

FirstEnergy has long questioned the prevailing narrative from the SDT that the requirement from 3.1.2 is cost-effective and not overly burdensome.

Likes 0

Dislikes 0

**Response**

**Matthew Nicklin - Southern Illinois Power Cooperative - 1,3,5 - SERC**

**Answer**

No

**Document Name**

**Comment**

We are not clear on what the SDT is trying to say in the following:

From Section 4 of Attachment 2:

Section 3.1.4: documentation showing the ability to protect user authentication information for user-initiated electronic access applicable to Section 3.1.3 while in transit between the Cyber System outside the asset containing low impact BCS or SCI that supports a low impact BCS and

**&bull; The asset containing low impact BCS or SCI that supports a low impact BCS,**

It seems that the bullet is an exact duplicate of the body of the explanation above the bullet? Is the SDT trying to cover communications between two (2) different LIBCS with this statement?

Likes 0

Dislikes 0

**Response**

**Dwanique Spiller - Berkshire Hathaway - NV Energy - 5**

**Answer**

Yes

**Document Name**

**Comment**

NV Energy appreciates the additional effort expended by the drafting team to list so many examples of what can be cited by Registered Entities as evidence of compliance, while also acknowledging that the list of examples is not limiting or exclusive.

Likes 0

Dislikes 0

**Response**

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



<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Please see EEI comments	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
MRO NSRF appreciates the additional effort expended by the drafting team to list so many examples of what can be cited by Registered Entities as evidence of compliance, while also acknowledging that the list of examples is not limiting or exclusive.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Hayden Maples - Hayden Maples 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; - Hayden Maples</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 2	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
N/A	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Allie Gavin - International Transmission Company Holdings Corporation - 1 - MRO,RF</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
ITC supports EEI's and NSRF's comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Hillary Creurer - Allete - Minnesota Power, Inc. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Minnesota Power supports MRO NSRF comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

**Comment**

EEl supports the language proposed in CIP-003-11 Attachment 2 as it conforms with language in Attachment 1.

Likes 0

Dislikes 0

**Response****Daniel Gacek - Exelon - 1**

**Answer**

Yes

**Document Name**

**Comment**

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

Likes 0

Dislikes 0

**Response****Ellese Murphy - Ellese Murphy On Behalf of: John Sturgeon, Duke Energy , 5, 6, 1, 1; - Ellese Murphy**

**Answer**

Yes

**Document Name**

**Comment**

Duke Energy supports the proposed language in CIP-003-11 Attachment 2.

Likes 0

Dislikes 0

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

**Answer**

Yes

**Document Name**

**Comment**

The NAGF supports the language proposed in CIP-013-11 Attachment 2.

Likes 0

Dislikes 0

**Response**

**Jessica Cordero - Unisource - Tucson Electric Power Co. - 1**

**Answer**

Yes

**Document Name**

**Comment**

TEPC supports the language proposed in CIP-003-11 Attachment 2.

Likes 0

Dislikes 0

**Response**

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer**

Yes

**Document Name**

**Comment**

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**

Likes 0

Dislikes 0

**Response**

**Constantin Chitescu - Ontario Power Generation Inc. - 5**

**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**

**Jesus Sammy Alcaraz - Imperial Irrigation District - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Mike Magruder - Avista - Avista Corporation - 1**

**Answer** Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Andrew Smith - APS - Arizona Public Service Co. - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Kinte Whitehead - Exelon - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>James Keele - Entergy - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

**Response**

**Rachel Schuldt - Black Hills Corporation - 6, Group Name** Black Hills Corporation - All Segments

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Clay Walker - Clay Walker On Behalf of: Robert Hirschak, Cleco Corporation, 6, 5, 1, 3; - Clay Walker**

**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**

**Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name** WECC CIP

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

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

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Richard Vendetti - NextEra Energy - 5****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Patricia Lynch - NRG - NRG Energy, Inc. - 5****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response**



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

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Gladys DeLaO - CPS Energy - 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**

**Karen Artola - CPS Energy - 1,3,5 - Texas RE**

**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**

**Donald Lock - Talen Generation, LLC - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**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**

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**

**Marvin Johnson - DTE Energy - Detroit Edison Company - 3**

**Answer** Yes

**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** Yes

**Document Name**

<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Alison Nickells - NiSource - Northern Indiana Public Service Co. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

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 a detailed explanation.

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

**Answer** No

**Document Name**

**Comment**

FirstEnergy does not support this proposed language.

Lack of New Definitions

The standard contemplates new concepts for Low Impact BES Cyber Systems (LIBCS) but does not define what those concepts mean

3.1.2 and the Technical Rationale Makes Flawed Assumptions about Network Topology

FirstEnergy has long questioned the prevailing narrative from the SDT that the requirement from 3.1.2 is cost-effective and not overly burdensome.

Likes 0

Dislikes 0

**Response**

**Jesus Sammy Alcaraz - Imperial Irrigation District - 1**

**Answer** No

**Document Name**

**Comment**

Additional factors to consider include the number of projects affecting this standard, such as virtualization changes, given the limited time available to successfully transition and integrate all these updates.

Likes 0

Dislikes 0

**Response**

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

**Answer** Yes

**Document Name**

**Comment**

**CEHE** does not oppose the proposed implementation plan for CIP-003-11.

Likes 0

Dislikes 0

**Response**

**Jessica Cordero - Unisource - Tucson Electric Power Co. - 1**

**Answer** Yes

**Document Name**

**Comment**

TEPC supports the proposed implementation plan.

Likes 0

Dislikes 0

**Response**

**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**

**Ellese Murphy - Ellese Murphy On Behalf of: John Sturgeon, Duke Energy , 5, 6, 1, 1; - Ellese Murphy**

**Answer** Yes

**Document Name**

**Comment**

Duke Energy supports the proposed Implementation Plan.

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**

**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.

Likes 0

Dislikes 0

**Response**

**Hillary Creurer - Allete - Minnesota Power, Inc. - 1**

**Answer** Yes

**Document Name**

**Comment**

Minnesota Power's implementation of the proposed rule changes is not expected to be as expansive as other utilities given that we already use LDAP, VPN and 2FA technologies for more than 75% of it's Low Impact Assets; it is expected that we will implement additional security monitoring to ensure the security and reliability of the BES in relation to these standard changes.

Likes 0

Dislikes 0

**Response**

**Allie Gavin - International Transmission Company Holdings Corporation - 1 - MRO,RF**

**Answer** Yes

**Document Name**

**Comment**

ITC supports EEI's and NSRF's comments.

Likes 0

Dislikes 0

**Response**

**Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers**

**Answer** Yes

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

**Hayden Maples - Hayden Maples 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; - Hayden Maples**

**Answer** Yes

**Document Name**

**Comment**

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 3

Likes 0

Dislikes 0

**Response**



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

**Answer** Yes

**Document Name**

**Comment**

MRO NSRF understands that three years is essentially the longest period NERC will approve for implementation. While industry was concerned with the large number of low impact assets affected, the additional time provided for the detection of malicious communications is greatly appreciated and eases implementation concerns.

Likes 0

Dislikes 0

**Response**

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

**Answer** Yes

**Document Name**

**Comment**

Please see EEI comments

Likes 0

Dislikes 0

**Response**

**Dwanique Spiller - Berkshire Hathaway - NV Energy - 5**

**Answer** Yes

**Document Name**

**Comment**

NV Energy understands that three years is essentially the longest period NERC will approve for implementation. While industry was concerned with the large number of low impact assets affected, the additional time provided for the detection of malicious communications is greatly appreciated and eases implementation concerns.

Likes 0

Dislikes 0

**Response**

**Matthew Nicklin - Southern Illinois Power Cooperative - 1,3,5 - SERC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer** Yes

**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** 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**

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

**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**

**Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Donald Lock - Talen Generation, LLC - 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

Karen Artola - CPS Energy - 1,3,5 - Texas RE

Answer

Yes

Document Name

**Comment**

Likes 0

Dislikes 0

**Response****Tyler Schwendiman - ReliabilityFirst - 10****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Gladys DeLaO - CPS Energy - 1****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Richard Jackson - U.S. Bureau of Reclamation - 1****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response**

**Patricia Lynch - NRG - NRG Energy, Inc. - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Richard Vendetti - NextEra Energy - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**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**

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

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Clay Walker - Clay Walker On Behalf of: Robert Hirschak, Cleco Corporation, 6, 5, 1, 3; - Clay Walker**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**James Keele - Entergy - 3**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Kinte Whitehead - Exelon - 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**

**Mike Magruder - Avista - Avista Corporation - 1**

**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**

**Constantin Chitescu - Ontario Power Generation Inc. - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

<b>Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>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</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

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.

**Dwanique Spiller - Berkshire Hathaway - NV Energy - 5**

**Answer** No

**Document Name**

**Comment**

While acknowledging that the SDT was bound by the SAR in drafting this revision, NV Energy does not believe the expected cost to address the risk to the many assets containing low impact BES Cyber Systems is appropriate. The costs will especially impact those Registered Entities that do not have high or medium impact policies, procedures or infrastructure that can be scaled up (although also at significant expense) to cover low impact assets.

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** No

**Document Name**

**Comment**

SRP believes that these proposed changes will result in strain on revised cyber security policies and procedures, hire and train new staff cyber security controls, purchase, procure, and install new technologies, and/or reconfigure system network or security architects.

Likes 0

Dislikes 0

**Response**

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

**Answer** No

**Document Name**

**Comment**

While acknowledging that the SDT was bound by the SAR in drafting this revision, the MRO NSRF does not believe the expected cost to address the risk to the many assets containing low impact BES Cyber Systems is appropriate. The costs will especially impact those Registered Entities that do not

have high or medium impact policies, procedures or infrastructure that can be scaled up (although also at significant expense) to cover low impact assets.

Likes 0

Dislikes 0

**Response**

**Allie Gavin - International Transmission Company Holdings Corporation - 1 - MRO,RF**

**Answer**

No

**Document Name**

**Comment**

ITC supports NSRF's comments.

Likes 0

Dislikes 0

**Response**

**Jesus Sammy Alcaraz - Imperial Irrigation District - 1**

**Answer**

No

**Document Name**

**Comment**

IID believes that the language in CIP-003-11 will place additional pressure on our current compliance responsibilities, including the need to update our cybersecurity policies and procedures, potentially hire and train new personnel, implement new technologies, and reconfigure network systems.

Likes 0

Dislikes 0

**Response**

**Hillary Creurer - Allete - Minnesota Power, Inc. - 1**

**Answer**

No

**Document Name**

**Comment**

While Minnesota Power has implemented SSLVPNs to many Low Impact Assets, and has existing authentications to Low Impact Generation Assets, there are costs associated with the procurement and implementation of the technologies.

Likes 0

Dislikes 0

### Response

**Jessica Cordero - Unisource - Tucson Electric Power Co. - 1**

**Answer**

No

**Document Name**

**Comment**

TEPC has not adressed if this is a cost-effective solution.

Likes 0

Dislikes 0

### Response

**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

**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**

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

**Answer** No

**Document Name**

**Comment**

FirstEnergy does not support this proposed language.

Lack of New Definitions

The standard contemplates new concepts for Low Impact BES Cyber Systems (LIBCS) but does not define what those concepts mean

3.1.2 and the Technical Rationale Makes Flawed Assumptions about Network Topology

FirstEnergy has long questioned the prevailing narrative from the SDT that the requirement from 3.1.2 is cost-effective and not overly burdensome.

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**

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

**Answer** Yes

**Document Name**

**Comment**

Please see EEI comments

Likes 0

Dislikes 0

**Response**

**Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Hayden Maples - Hayden Maples 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; - Hayden Maples**

**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**

**Mike Magruder - Avista - Avista Corporation - 1**

**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**

**Ellese Murphy - Ellese Murphy On Behalf of: John Sturgeon, Duke Energy , 5, 6, 1, 1; - Ellese Murphy**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**James Keele - Entergy - 3**

**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**

**Patricia Lynch - NRG - NRG Energy, Inc. - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Gladys DeLaO - CPS Energy - 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**

**Karen Artola - CPS Energy - 1,3,5 - Texas RE**

**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**

**Donald Lock - Talen Generation, LLC - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**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** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC**

**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**

**Marvin Johnson - DTE Energy - Detroit Edison Company - 3**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Matthew Nicklin - Southern Illinois Power Cooperative - 1,3,5 - SERC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers**

**Answer**

**Document Name**

**Comment**

Ameren will not comment on the cost effectiveness of the project

Likes 0

Dislikes 0

**Response**

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

**Answer**

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer**

**Document Name**

**Comment**

*GO/GOPs will need more information to adequately assess the cost effectiveness of the proposed approach.*

Likes 0

Dislikes 0

**Response**

**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**

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

**Answer**

**Document Name**

**Comment**

CEHE does not comment on costs.

Likes 0

Dislikes 0

**Response**

**Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name** WECC CIP

**Answer**

**Document Name**

**Comment**

No comments on cost-effectiveness.

Likes 0

Dislikes 0

**Response**

5. Do you have any concerns in the way Project 2023-04 made conforming changes to CIP-003-11 to align with virtualization changes in Project 2016-02?

**Richard Vendetti - NextEra Energy - 5**

**Answer** No

**Document Name**

**Comment**

NextEra supports EEI comments below:

EEI supports the way Project 2023-04 made conforming changes to CIP-003-11 to align with virtualization changes in Project 2016-02.

Likes 0

Dislikes 0

**Response**

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

**Answer** No

**Document Name**

**Comment**

CEHE has no comments.

Likes 0

Dislikes 0

**Response**

**Clay Walker - Clay Walker On Behalf of: Robert Hirschak, Cleco Corporation, 6, 5, 1, 3; - Clay Walker**

**Answer** No

**Document Name**

**Comment**

Cleco agrees with EEI. EEI supports the way Project 2023-04 made conforming changes to CIP-003-11 to align with virtualization changes in Project 2016-02.

Likes 0

Dislikes 0

**Response**

**Jessica Cordero - Unisource - Tucson Electric Power Co. - 1**

**Answer** No

**Document Name**

**Comment**

TEPC supports the DT edits to align with the virtualization changes.

Likes 0

Dislikes 0

**Response**

**Daniel Gacek - Exelon - 1**

**Answer** No

**Document Name**

**Comment**

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

Likes 0

Dislikes 0

**Response**

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

**Answer** No

**Document Name**

**Comment**

EEI supports the way Project 2023-04 made conforming changes to CIP-003-11 to align with virtualization changes in Project 2016-02.

Likes 0

Dislikes 0

**Response**



**Hillary Creurer - Allete - Minnesota Power, Inc. - 1**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Allie Gavin - International Transmission Company Holdings Corporation - 1 - MRO,RF**

**Answer** No

**Document Name**

**Comment**

ITC supports EEI's and NSRF's comments.

Likes 0

Dislikes 0

**Response**

**Hayden Maples - Hayden Maples 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; - Hayden Maples**

**Answer** No

**Document Name**

**Comment**

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 5

Likes 0

Dislikes 0

**Response**

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

**Answer** No

**Document Name**

**Comment**

MRO NSRF believes this was a prudent move as NERC has already sent CIP-003-10 to FERC for approval.

Likes 0

Dislikes 0

**Response**

**Dwanique Spiller - Berkshire Hathaway - NV Energy - 5**

**Answer** No

**Document Name**

**Comment**

NV Energy believes this was a prudent move as NERC has already sent CIP-003-10 to FERC for approval.

Likes 0

Dislikes 0

**Response**

**Alison Nickells - NiSource - Northern Indiana Public Service Co. - 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

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Ijad Dewan - Hydro One Networks, Inc. - 1 - NPCC</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Erik Gustafson - PNM Resources - 1,3 - WECC,Texas RE</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>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</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	

Likes 0

Dislikes 0

**Response**

**Donald Lock - Talen Generation, LLC - 5**

**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**

**Tyler Schwendiman - ReliabilityFirst - 10**

**Answer**

No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Gladys DeLaO - CPS Energy - 1**

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Richard Jackson - U.S. Bureau of Reclamation - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Patricia Lynch - NRG - NRG Energy, Inc. - 5</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Donna Wood - Tri-State G and T Association, Inc. - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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**

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

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer** No

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Andrew Smith - APS - Arizona Public Service Co. - 5</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Mike Magruder - Avista - Avista Corporation - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

**Response**

**Kinte Whitehead - Exelon - 3**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jesus Sammy Alcaraz - Imperial Irrigation District - 1**

**Answer** No

**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** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators**

**Answer** No



<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
FirstEnergy has no issues with these changes to align the virtualization changes from CIP-003-10 to CIP-003-11.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Ellese Murphy - Ellese Murphy On Behalf of: John Sturgeon, Duke Energy , 5, 6, 1, 1; - Ellese Murphy</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
No, Duke Energy supports the confirming changes.	

Likes 0

Dislikes 0

**Response**

**Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers**

**Answer**

Yes

**Document Name**

**Comment**

How would this change if we had virtual firewalls?

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**

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

**Answer**

Yes

**Document Name**

**Comment**

Please see EEI comments

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**

Considering the number of projects impacting the standard, there is limited time available to effectively transition and successfully integrate all these changes.

Likes 0

Dislikes 0

**Response**

**Matthew Nicklin - Southern Illinois Power Cooperative - 1,3,5 - SERC**

**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**

**Carver Powers - Utility Services, Inc. - 4**

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>James Keele - Entergy - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

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

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

Answer

Document Name

Comment

Please see EEI comments

Likes 0

Dislikes 0

Response

Romel Aquino - Edison International - Southern California Edison Company - 3

Answer

Document Name

[2023-04\\_Unofficial\\_Comment\\_Form\\_Additional\\_Ballot\\_3\\_091124\\_Final Comments.docx](#)

Comment

See comments submitted by the Edison Electric Institute (EEI)

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer

Document Name

Comment

We want to thank the SDT for their hard work and allowing us to provide feedback.

Likes 0

Dislikes 0

Response

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

**Answer**

**Document Name**

**Comment**

MRO NSRF appreciates the drafting team addressing industry's concern with the previous CIP-003-12 implementation plan that allowed for possibility of FERC bypassing the previously proposed CIP-003-11 and approving both CIP-003-10 and CIP-003-12 (or even just CIP-003-12) which would have reduced the implementation time from 36 months to 24 months. We are also very grateful for the additional time to implement detection of malicious communications.

Likes 0

Dislikes 0

**Response**

**Hayden Maples - Hayden Maples 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; - Hayden Maples**

**Answer**

**Document Name**

**Comment**

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 6

Likes 0

Dislikes 0

**Response**

**Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers**

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

**Allie Gavin - International Transmission Company Holdings Corporation - 1 - MRO,RF**

**Answer**

**Document Name**

**Comment**

ITC supports EEI's and NSRF's comments.

Likes 0

Dislikes 0

**Response**

**Jesus Sammy Alcaraz - Imperial Irrigation District - 1**

**Answer**

**Document Name**

**Comment**

Even though there weren't any redlines in section 5 of Attachment 1 for TCAs, we would like to point out that authentication is not required for assets registered as TCAs. For example, our field personnel are acquiring test equipment that will be inventoried and registered as a transient asset, but lacks strong authentication and is not integrated with any AD/LDAP services.

Furthermore, we operate within a geographical region characterized by limited access of local academic enrichment opportunities for professionals in cybersecurity. Moreover, this project will require significant technical effort, substantial capital investment, and the augmentation of staffing resources.

Likes 0

Dislikes 0

**Response**

**Hillary Creurer - Allete - Minnesota Power, Inc. - 1**

**Answer**

**Document Name**

**Comment**

Minnesota Power feels that low impact security and response requirements should be moved to the respective CIP standard of which is already in-place for Medium and High Impact assets. For example, Cyber Security Awareness requirements should be rolled into CIP-004; Physical Security requirements should be rolled into CIP-006, Electronic Security Perimeter Requirements should be rolled into CIP-005, and Cyber Security Incident Response should be rolled into CIP-008, etc.

This will align low impact with high and medium impacts and place all the specific requirements within one standard and not spread out across multiple standards. This will also allow CIP-003 to maintain its original purpose, "Security Management Controls".

In addition, Minnesota Power supports EEI response and has concern with how section 1.1 and 1.3 are currently written. We support EEI's version of this language.

Likes 0

Dislikes 0

### Response

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

**Answer**

**Document Name**

**Comment**

EEI offers the following non-substantive changes for consideration:

CIP-003-11 Section C. Compliance includes modifications to the 1.1 Compliance Enforcement Authority definition that do not align with the definition in the Rules of Procedure that became effective June 27, 2024. Please modify the definition to align as follows:

1.1. Compliance Enforcement Authority: As defined in the NERC Rules of Procedure, "Compliance Enforcement Authority" (CEA) means NERC or the Regional Entity in their respective roles of monitoring and/or enforcing compliance with **the NERC Reliability Standards**.

Additionally, 1.3 Compliance Monitoring and Enforcement Program in CIP-003-011 does not align with the defined term in the Rules of Procedure that became effective June 27, 2024. Please modify the definition to align as follows:

1.3 Compliance Monitoring and Enforcement Program: As defined in the NERC Rules of Procedure, "Compliance Monitoring and Enforcement Program" means, depending on the context (1) the **NERC Compliance Monitoring and Enforcement Program (Appendix 4C to the NERC Rules of Procedure)** or the **Commission-approved program of a Regional Entity, as applicable, or (2) the program, department or organization within NERC or a Regional Entity that is responsible for performing compliance monitoring and enforcement activities with respect to Registered Entities' compliance with Reliability Standards.**

Likes 0

Dislikes 0

### Response

**Kinte Whitehead - Exelon - 3**

**Answer**

**Document Name**

**Comment**

Exelon in responding in support of the EEI to this question.



Likes 0

Dislikes 0

**Response**

**Daniel Gacek - Exelon - 1**

**Answer**

**Document Name**

**Comment**

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

Likes 0

Dislikes 0

**Response**

**Ellese Murphy - Ellese Murphy On Behalf of: John Sturgeon, Duke Energy , 5, 6, 1, 1; - Ellese Murphy**

**Answer**

**Document Name**

**Comment**

Duke Energy does not have any additional comments.

Likes 0

Dislikes 0

**Response**

**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**

**James Keele - Entergy - 3**

**Answer**

**Document Name**

**Comment**

Entergy is concerned that the proposed requirements for Low Impact Electronic Access Controls in some cases exceed the requirements for Medium Impact BCS (e.g. protecting authentication information if not identified as BCSI), or require controls that are explicitly excluded from some Medium Impact facility types. For example, proposed CIP-003-11 R2 Attachment 1 Section 3.1.2 requires entities to “detect known or suspected malicious communications for both inbound or outbound electronic access” for all Low Impact BCS including Control Centers, Generation Facilities, Substations, and more. However, this requirement reads nearly identically to CIP-005-7 R1.5 which is only applicable to Control Centers per the current definition of High Impact BCS and the specific use of “Medium Impact BES Cyber Systems at Control Centers”. Entergy’s concerned that this strays away from the risk-based approach that the impact ratings are meant to imply, and instead of a steady “trickle-down” of controls across risk levels would result in a more complicated control and process structure that could result in increased likelihood of confusion and human error.

Likes 0

Dislikes 0

**Response**

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

**Answer**

**Document Name**

**Comment**

The Violation Severity Levels for R2 contain references to Attachment 1, Section 6. Section 6 in Attachment 1 has been deleted.

Likes 0

Dislikes 0

**Response**

**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**

**Clay Walker - Clay Walker On Behalf of: Robert Hirschak, Cleco Corporation, 6, 5, 1, 3; - Clay Walker**

**Answer**

**Document Name**

**Comment**

See EEI comments.

Likes 0

Dislikes 0

**Response**

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

**Answer**

**Document Name**

**Comment**

Manitoba Hydro appreciates the drafting team's implementation of industry feedback and is supportive of the changes made.

Likes 0

Dislikes 0

**Response**

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

**Answer**

**Document Name**

**Comment**

CEHE has concerns about The Violation Severity Levels for R2 contain references to Attachment 1, Section 6. Section 6 in Attachment 1 has been deleted.

Likes 0

Dislikes 0

### Response

**Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC CIP**

**Answer**

**Document Name**

**Comment**

No additional comments.

Likes 0

Dislikes 0

### Response

**Richard Vendetti - NextEra Energy - 5**

**Answer**

**Document Name**

**Comment**

NextEra supports EEI's comments below:

EEI offers the following non-substantive changes for consideration:

CIP-003-11 Section C. Compliance includes modifications to the 1.1 Compliance Enforcement Authority definition that do not align with the definition in the Rules of Procedure that became effective June 27, 2024. Please modify the definition to align as follows:

1.1. Compliance Enforcement Authority: As defined in the NERC Rules of Procedure,

“Compliance Enforcement Authority” (CEA) means NERC or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with **the NERC Reliability Standards** mandatory and enforceable Reliability Standards in their respective jurisdictions.

Additionally, 1.3 Compliance Monitoring and Enforcement Program in CIP-003-011 does not align with the defined term in the Rules of Procedure that became effective June 27, 2024. Please modify the definition to align as follows:

1.3 Compliance Monitoring and Enforcement Program: As defined in the NERC Rules

of Procedure, "Compliance Monitoring and Enforcement Program" means, depending on the context (1) the NERC ***Compliance Monitoring and Enforcement Program (Appendix 4C to the NERC Rules of Procedure)*** or the Commission-approved program of a Regional Entity, as applicable, or (2) the program, department or organization within NERC or a Regional Entity that is responsible for performing compliance monitoring and enforcement activities with respect to Registered Entities' compliance with Reliability Standards refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated Reliability Standard.

Likes 0

Dislikes 0

### Response

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

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

### Response

**Gladys DeLaO - CPS Energy - 1**

**Answer**

**Document Name**

**Comment**

CPS Energy does not have any additional comments.

Likes 0

Dislikes 0

**Response**

**Donald Lock - Talen Generation, LLC - 5**

**Answer**

**Document Name**

**Comment**

R3.1.5, "Include one or more method(s) for determining vendor electronic access, where vendor electronic access is permitted," is incomprehensible. Did you mean to say, "authorizing," instead of, "determining," i.e. giving approval for granting access? Please clarify this requirement in the final standard.

Likes 0

Dislikes 0

**Response**

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

**Answer**

**Document Name**

**Comment**

See above comments on behalf of FirstEnergy.

Likes 0

Dislikes 0

**Response**

**Matthew Nicklin - Southern Illinois Power Cooperative - 1,3,5 - SERC**

**Answer**

**Document Name**

**Comment**

We want to thank the SDT for their hard work and allowing us to provide feedback.

Likes 0

Dislikes 0

**Response**

