

## Comment Report

**Project Name:** 2021-03 CIP-002 | CIP-002-8 - Draft 3  
**Comment Period Start Date:** 8/29/2024  
**Comment Period End Date:** 10/15/2024  
**Associated Ballots:** 2021-03 CIP-002 CIP-002-Y AB 3 ST  
2021-03 CIP-002 Implementation Plan AB 3 OT  
2021-03 CIP-002 Non-binding Poll AB 3 NB

There were 63 sets of responses, including comments from approximately 165 different people from approximately 105 companies representing 10 of the Industry Segments as shown in the table on the following pages.

## Questions

- 1. Based on industry comments from informal and formal outreach, the DT has modified the Control Center definition. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and a recommendation for an alternate definition.**
- 2. Language throughout Attachment 1 of CIP-002-8 that referred to the “functional obligations” of the different Registered Entities has been replaced with the term “reliability tasks”. This change was incorporated given that the NERC Functional Model is no longer being actively maintained and aligns with CIP-002 language with the existing language of the Control Center definition. Do you agree with the proposed changes to CIP-002-8? Does the change introduce reliability gaps to the Registered Entities? If not, please provide the basis for your disagreement and an alternate proposal.**
- 3. The DT reworded the exclusion clause in Criteria 2.12 to provide clarity and to simplify the concepts. Further, the DT replaced the concept of a group of contiguous transmission Elements (GCTE) with the concept of a group of contiguous Elements to clarify that the group of Elements may contain transmission Elements and non-transmission Elements. Lastly, the 75 MW gross export limitation was changed to 75 MWh to appropriately reflect an hourly integrated gross export, as opposed to an instantaneous measurement within the hour. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.**
- 4. For the Implementation Plan, the DT elected to retain 24-month window as it aligns with the established 24-month window that is currently provided to Responsible Entities who identify their first high impact or medium impact BES Cyber System. Further, given that the earliest effective date of CIP-002-8 is April 1, 2026 (aligning with the earliest possible effective date of CIP-002-7), entities will have adequate time to evaluate impacts before the 24-month window commences. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.**
- 5. Provide any additional comments for the drafting team 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
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
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
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
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
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
					Chantal Mazza	Hydro Quebec	1	NPCC
					Nicolas Turcotte	Hydro Quebec	2	NPCC
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
Associated Electric Cooperative, Inc.	Todd Bennett	3		AECI	Michael Bax	Central Electric Power Cooperative (Missouri)	1	SERC
					Adam Weber	Central Electric Power Cooperative (Missouri)	3	SERC

Gary Dollins	M and A Electric Power Cooperative	3	SERC
William Price	M and A Electric Power Cooperative	1	SERC
Olivia Olson	Sho-Me Power Electric Cooperative	1	SERC
Mark Ramsey	N.W. Electric Power Cooperative, Inc.	1	SERC
Heath Henry	NW Electric Power Cooperative, Inc.	3	SERC
Tony Gott	KAMO Electric Cooperative	3	SERC
Micah Breedlove	KAMO Electric Cooperative	1	SERC
Brett Douglas	Northeast Missouri Electric Power Cooperative	1	SERC
Skyler Wiegmann	Northeast Missouri Electric Power Cooperative	3	SERC
Mark Riley	Associated Electric Cooperative, Inc.	1	SERC
Brian Ackermann	Associated Electric Cooperative, Inc.	6	SERC
Chuck Booth	Associated Electric Cooperative, Inc.	5	SERC
Jarrod Murdaugh	Sho-Me Power Electric Cooperative	3	SERC



1. Based on industry comments from informal and formal outreach, the DT has modified the Control Center definition. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and a recommendation for an alternate definition.

**Rebika Yitna - Rebika Yitna On Behalf of: David Weekley, MEAG Power, 3, 1; - Rebika Yitna**

**Answer** No

**Document Name**

**Comment**

Putting the Transmission Owner (TO) definition separate from the original definition is acceptable; however, the language should be consistent and include the Bulk Electric System in the definition. Suggested wording update for the TO Control Center definition: "One or more facilities of a Transmission Owner that have the capability to control the Bulk Electric System and to control Transmission Facilities at two or more locations in real-time using SCADA, including their associated data centers, and excluding field Cyber Assets used for telemetry."

Likes 0

Dislikes 0

**Response**

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

**Answer** No

**Document Name**

**Comment**

BPA finds the second part of the proposed Control Center definition to be vague and confusing. The research required to find and understand the examples and rationale are too convoluted and spread out. BPA recommends rewording the section after the 'or' to at least define where a person will find explanations of the intent. The use of the term facilities, lower case, should be replaced with another term such as 'locations' or 'sites'.. The use of the word "capability" is too open in interpretation. BPA recommends striking "capability" from the definition.

Likes 0

Dislikes 0

**Response**

**Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI**

**Answer** No

**Document Name**

**Comment**

The definition is too prescriptive on technology. SCADA systems are only one way to operate elements at BES Facilities. Some Control Centers may operate BES elements via other technology such as a relay network or another industrial control system not defined as SCADA.

Likes 0

Dislikes 0

### Response

**Ijad Dewan - Ijad Dewan On Behalf of: Emma Halilovic, Hydro One Networks, Inc., 1; - Ijad Dewan**

**Answer**

No

**Document Name**

### Comment

Clarity on “SCADA system that can control the transmission Facility”. The standard specifically excludes “Field Assets used for Telemetry” but does not also exclude **regional data concentrators**. The new verbiage only talks about the capability to control -> This needs to be quantified as available operator interfaces designed for control of these 2 or more transmission substations; not the ability to configure an interface for control. An argument can be made that a regional data concentrator "could" be used to issue controls. Although impractical for grid control, however it is possible. Hydro One suggestion is to change "capability" to "authority" in the definition on Pg.2.

Likes 0

Dislikes 0

### Response

**Erin Wilson - NB Power Corporation - New Brunswick Power Transmission Corporation - 5**

**Answer**

No

**Document Name**

### Comment

In the last sentence “Cyber Asset” should be replaced with BCS.

The following network architecture scenarios are not limited to “facilities”:

For example: A small municipal utility has the capability to monitor and control the two Transmission substations that they own through their SCADA system:

1. If there is a desk with a SCADA HMI located in the engineering office that may be used by any of the utility engineers, but no one is assigned to that desk, is the engineering office a Control Center? or
2. If the configuration listed above is a Control Center, can the Control Center classification be removed if the SCADA desk is moved into the hallway or the parking lot? or
3. If the engineers can remote into the SCADA from their computers at their desk, is the engineering office a Control Center? or

4. If an engineer remotes into the SCADA system from a remote (room) location (home office, Starbucks) is this room now a Control Center?

5. If the utility has a room that houses equipment for SCADA access but is only staffed during poor weather events for the purpose of dispatching field personnel, is this room a Control Center?

Likes 0

Dislikes 0

**Response**

**Jeffrey Streifling - NB Power Corporation - 1**

**Answer**

No

**Document Name**

**Comment**

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2. If the configuration listed above is a Control Center, can the Control Center classification be removed if the SCADA desk is moved into the hallway or the parking lot? or
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5. If the utility has a room that houses equipment for SCADA access but is only staffed during poor weather events for the purpose of dispatching field personnel, is this room a Control Center?

Likes 0

Dislikes 0

**Response**

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

**Answer**

No

**Document Name**

**Comment**

The MRO NSRF appreciates the SDT's efforts to incorporate the need for TOs to be included in the definition, while recognizing that the rest of the Control Center definition is well understood. The

addition of the TO language may inadvertently bring HVDC stations into scope and so the MRO NSRF recommends adding an exclusion or clarifying information that this “Excludes station to station communication for HVDC control functions.”

Likes 0

Dislikes 0

### Response

**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**

No

**Document Name**

### Comment

The formatting of the revised Control Center definition is confusing where it uses the term “OR”. Use of all upper case letters within NERC Standards has generally implied use of an abbreviation. SMUD recommends replacing this term with “or” and reformatting the definition to prevent the use of a second paragraph solely to include TO facilities. The following proposed edit to the Control Center definition is minor and could be made in the final draft.

Control Center –

1) One or more facilities hosting operating personnel that monitor and control the Bulk Electric System (BES) in real time to perform the reliability tasks, including their associated data centers, of:

- a Reliability Coordinator,
- a Balancing Authority,
- a Transmission Operator of transmission Facilities at two or more location, or
- a Generator Operator for generation Facilities at two or more locations, or

2) One or more facilities of a Transmission Owner that have the capability to control transmission Facilities at two or more locations in real-time using Supervisory Control and Data Acquisition (SCADA), including their associated data centers, and excluding filed Cyber Assets used for telemetry.

Likes 0

Dislikes 0

### Response

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

**Answer**

No

**Document Name**

### Comment

Per NIPSCO's comments under #5 below, we believe that the gap that this Control Center definition change is meant to address is best addressed in the registration process.

Likes 0

Dislikes 0

## Response

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

**Answer**

No

**Document Name**

## Comment

Manitoba Hydro agrees with the direction of the SDT to add an additional definition for a TO control center and leave the rest of the definition unchanged and thanks the SDT for their careful consideration of the definition. The use of the defined term "SCADA" greatly helps to clarify and differentiate between a Control Center (and associated Control Center Cyber Asset) and a remote access connection or local field control.

Manitoba Hydro requests additional clarification be added to the definition for HVDC systems. These are treated as a single Facility that can span a large distance. In order to have local control over HVDC output, there is communication that goes to the other end of the system. In a broad sense this could be considered a SCADA system, however in a practical sense this is considered local control of the HVDC Facility. Manitoba Hydro suggests the definition be amended to specifically address this by adding the following:

"Excludes station to station communication for HVDC control functions."

Manitoba Hydro requests additional clarification in the technical rational or standard to differentiate between local and remote control. When a control room is located at a Transmission station, and that control room has the remote control over one other location, in addition to local control, it is not clear if this is considered two or more locations. This could be clarified in the technical rational or the following modification to the control center definition is proposed:

Control Center – One or more facilities hosting operating personnel that monitor and control the Bulk Electric System (BES) in real-time to perform the reliability tasks, including their associated data centers, of: 1) a Reliability Coordinator, 2) a Balancing Authority, 3) a Transmission Operator for transmission Facilities at two or more locations, or 4) a Generator Operator for generation Facilities at two or more locations.

OR

One or more facilities of a Transmission Owner that have **Cyber Assets with** the capability to **remotely** control transmission Facilities at two or more locations in real-time using Supervisory Control and Data Acquisition (SCADA), including their associated data centers, and excluding field Cyber Assets used for telemetry **and station to station communication for HVDC control functions.**

Likes 0

Dislikes 0

**Response**

**Chantal Mazza - Chantal Mazza On Behalf of: Nicolas Turcotte, Hydro-Quebec (HQ), 1, 5; - Chantal Mazza**

**Answer** No

**Document Name**

**Comment**

In the last sentence of the Control Center definition, Cyber Assets should be replaced with BCS

Likes 0

Dislikes 0

**Response**

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

**Answer** No

**Document Name**

**Comment**

The definition as proposed is unclear regarding the number of Facilities at another location that must be controlled in order to be considered a Control Center. TVA suggests revise the Control Center definition to be consistent with the examples provided in the Technical Rationale, which clarifies that there must be control of at least two Facilities at another distinct location to be considered a Control Center.

In addition, TVA disagrees with the change from “facilities hosting operating personnel” to “facilities having the capability to control transmission Facilities”. The proposed language is inappropriately over-broad and has the potential to errantly identify Transmission Facilities as Control Centers, a function they were never intended to execute.

Likes 0

Dislikes 0

**Response**

**Dave Krueger - SERC Reliability Corporation - 10**

**Answer** No

**Document Name**

**Comment**

- SERC appreciates the ongoing efforts to refine the CIP-002 standard. SERC does believe that the changes to the Control Center definition have improved its clarity and removed gaps. However, SERC has not found support in the field trial or in other data presented in the various

SARs to support the removal for consideration of field Cyber Assets used for telemetry. These devices collectively are the 'eyes and ears' of the Control Center for providing the decisional data and wide-area situational awareness, and the broad loss of field telemetry systems has been implicated in causing the inoperability of Control Centers in past NERC Lessons Learned documents. Only considering the impact of singular telemetry devices on the field location they are located at would seem to overly credit the redundancy of having many telemetry devices at the expense of providing CIP protections for any of them, instead of considering them as part of the systems which provide critical data for the Control Center to perform its reliability. If the SDT wishes to address the recently added SAR by suggesting complete removal of these devices from CIP consideration, perhaps an additional field trial or data gathering would provide such support. Even without such global removal language, an entity could provide evidence that the loss, degradation, or misuse such telemetry Cyber Systems do not impact the reliability tasks that they specifically perform if that was the case.

In addition, we continue to maintain that limiting inclusion to only those TO facilities using SCADA protocols for control may introduce a reliability gap where such control is affected using terminal servers, remote management protocols to HMIs, or other similar modern means for remote control. A suggestion may be to review the changes made in CIP-005-6 and CIP-005-7 to describe 'system-to-system' relationships between Cyber Assets, which is protocol agnostic and provides some future growth room without requiring standards modification.

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**

No

**Document Name**

**Comment**

In the last sentence "Cyber Asset" should be replaced with BCS.

The following network architecture scenarios are not limited to "facilities":

For example: A small municipal utility has the capability to monitor and control the two Transmission substations that they own through their SCADA system:

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2. If the configuration listed above is a Control Center, can the Control Center classification be removed if the SCADA desk is moved into the hallway or the parking lot? or
3. If the engineers can remote into the SCADA from their computers at their desk, is the engineering office a Control Center? or
4. If an engineer remotes into the SCADA system from a remote (room) location (home office, Starbucks) is this room now a Control Center?
5. If the utility has a room that houses equipment for SCADA access but is only staffed during poor weather events for the purpose of dispatching field personnel, is this room a Control Center?

Likes 0

Dislikes 0

**Response**

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

**Answer** No

**Document Name**

**Comment**

Minnesota Power supports NSRF's comments. Minnesota Power strongly recommends adding the clarification statement, "Excludes station to station communication for HVDC control functions," to the revised definition of a Control Center.

Likes 0

Dislikes 0

**Response**

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

**Answer** No

**Document Name**

**Comment**

NV Energy appreciates the SDT's efforts to incorporate the need for TOs to be included in the definition, while recognizing that the rest of the Control Center definition is well understood. The addition of the TO language may inadvertently bring HVDC stations into scope and so NV Energy recommends adding an exclusion or clarifying information that this "Excludes station to station communication for HVDC control functions."

Likes 0

Dislikes 0

**Response**

**George E Brown - Pattern Operators LP - 5**

**Answer** No

**Document Name**

**Comment**

Pattern Energy has concerns with the new proposed language for the definition of a Control Center.



First, the repeat use of 'facilities' and 'Facilities' will cause unintended interpretations. We do understand that 'facilities' is meant to describe the location hosting SCADA, but how the definition is currently written this is not apparently clear.

Second, transmission Facilities is not defined in the sense of which entity/who is responsible to determine what equipment is included in one transmission Facility versus what equipment should be included in another transmission Facility. This will lead to inconsistencies in application and enforcement of the definition. Pattern Energy suggests that the Transmission Owner for the equipment determine what equipment is included in which transmission Facility.

Pattern Energy suggests the following language to remove the aforementioned concerns.

“. . . One or more Transmission Owner facilities, including their associated data centers, and excluding field Cyber Assets used for telemetry, that have the capability in real-time using Supervisory Control and Data Acquisition (SCADA) and host the SCADA, to control multiple transmission Facilities at two or more locations, with the equipment that compromise the transmission Facility being defined by the Transmission Owner.”

Likes 0

Dislikes 0

### Response

#### Kevin Conway - Western Power Pool - 4

Answer

No

Document Name

### Comment

It is not clear if the additional text: "One or more facilities of a Transmission Owner that have the capability to control transmission Facilities at two or more locations in real-time using Supervisory Control and Data Acquisition (SCADA), including their associated data centers, and excluding field Cyber Assets used for telemetry. " implies that "operating personnel" are required to be present to monitor and control the BES in real-time to perform reliability tasks. The role of a Transmission Owner is not to monitor and control BES assets for real-time reliability purposes, but to monitor them for maintenance purposes.

If the TO does not have to operating personnel hosted in a location (that allows for the control of two or more BES transmission Facilities), are they held to a higher standard than the RC, TOP, and BA entities? The RC, TOP and BA entities are clearly required to be hosting operating personnel according to their applicability in the definition.

As an , where an unmanned substation has control of local transmission switching for two different switchyards. Operating personnel are not hosted in the location, but SCADA controls allow for the control of two or more transmission Facilities. The proposed definition identifies this as a Control Room. The fact may be that the two local transmission Facilities are within the same fencing and at the same physical location. Is the intent of the drafting team to define these as control centers?

Likes 0

Dislikes 0

**Response**

**Junji Yamaguchi - Hydro-Quebec (HQ) - 1,5**

**Answer** No

**Document Name**

**Comment**

In the last sentence “Cyber Asset” should be replaced with BCS.

Likes 0

Dislikes 0

**Response**

**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**

**Melanie Wong - Seminole Electric Cooperative, Inc. - 5**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>While FirstEnergy supports the proposed definition, we suggest the following edit to ensure that BES falls under the Control Center definition:</p> <p>One or more facilities of a Transmission Owner that have the capability to control <b>BES</b> Facilities at two or more locations in real-time using Supervisory Control and Data Acquisition (SCADA), including their associated data centers, and excluding field Cyber Assets used for telemetry.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p><b>CenterPoint Energy Houston Electric, LLC (CEHE) does not oppose the proposed changes. The proposed modifications to the Control Center definition addresses prior concerns that CEHE had with the new terminology.</b></p>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Ellese Murphy - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>Duke Energy supports the modified Control Center definition and thanks the drafting team for their work.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Matt Carden - Southern Company - Southern Company Services, Inc. - 1</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Southern Company and EEI supports the revisions to the Control Center definition and appreciates the informal outreach conducted by the drafting team ahead of the formal comment and ballot period.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>James Keele - Entergy - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
I would like to see expanded definitions for the GOP functions ie. the difference between GOP in a control center vs GOP in a power plant (operator).	
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>	
<b>Comment</b>	
EEI supports the revisions to the Control Center definition and appreciates the informal outreach conducted by the drafting team ahead of the formal comment and ballot period.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Beth Smail - AEP - 1,3,5,6 - MRO,Texas RE,RF</b>	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
AEP agrees with the latest revisions to the Control Center definition.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>David Jendras Sr - Ameren - Ameren Services - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Ameren agrees with and supports NAGF and EEI comments.	
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 1	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>TRACEY JOHNSON - Southern Indiana Gas and Electric Co. - 3,5,6 - RF</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

**Comment**

Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South (SIGE) supports the comments as submitted by Edison Electric Institute (EEI).

Likes 0

Dislikes 0

**Response****Kinte Whitehead - Exelon - 3**

**Answer**

Yes

**Document Name**

**Comment**

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

Likes 0

Dislikes 0

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

**Answer**

Yes

**Document Name**

**Comment**

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

Likes 0

Dislikes 0

**Response****Marcus Bortman - APS - Arizona Public Service Co. - 6**

**Answer**

Yes

**Document Name**

**Comment**

AZPS agrees

Likes 0

Dislikes 0

**Response**

**Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC**

**Answer**

Yes

**Document Name**

**Comment**

SPP supports the SDT's efforts to include the need for TOs to be included in the definition, while recognizing that the rest of the Control Center definition is well understood.

Likes 0

Dislikes 0

**Response**

**Roger Perkins - Southern Maryland Electric Cooperative - 1,3**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Adam Peterson - Cedar Falls Utilities - 1**

**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**

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

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Gladys DeLaO - CPS Energy - 1,3,5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer**

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>Mike Magruder - Avista - Avista Corporation - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>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; John Nierenberg, 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</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	

Dislikes 0

**Response**

**Jeremy Lawson - Northern California Power Agency - 3,4,5,6**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Amy Wesselkamper - PNM Resources - Public Service Company of New Mexico - 3**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Stacy Engelmann - City of College Station - 1**

**Answer**

Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1</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 Black Hills Corporation - All Segments</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>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>Israel Perez - Israel Perez On Behalf of: Mathew Weber, Salt River Project, 3, 6, 5, 1; Sarah Blankenship, 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>	
<b>Carver Powers - Utility Services, Inc. - 4</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Stephen Stafford - Stephen Stafford On Behalf of: Greg Davis, Georgia Transmission Corporation, 1; - Stephen Stafford</b>	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>VAL GUZMAN - Silicon Valley Power - City of Santa Clara - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Jeffrey Ipsaro - Silicon Valley Power - City of Santa Clara - 3,4,5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Sandra Pacheco - Silicon Valley Power - City of Santa Clara - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

**Response**

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

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**LaTroy Brumfield - LaTroy Brumfield On Behalf of: Amy Wilke, American Transmission Company, LLC, 1; - LaTroy Brumfield**

**Answer** Yes

**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**

*The NAGF does not have a position on the modified Control Center definition as our focus is based on the presepective of a GO/GOP.*

Likes 0

Dislikes 0

**Response**

**Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott**

**Answer**

<b>Document Name</b>	
<b>Comment</b>	
ITC has no comment.	
Likes 0	
Dislikes 0	
<b>Response</b>	

2. Language throughout Attachment 1 of CIP-002-8 that referred to the “functional obligations” of the different Registered Entities has been replaced with the term “reliability tasks”. This change was incorporated given that the NERC Functional Model is no longer being actively maintained and aligns with CIP-002 language with the existing language of the Control Center definition. Do you agree with the proposed changes to CIP-002-8? Does the change introduce reliability gaps to the Registered Entities? If not, please provide the basis for your disagreement and an alternate proposal.

**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**

**Kevin Conway - Western Power Pool - 4**

**Answer** No

**Document Name**

**Comment**

The term "reliability tasks" adds no additional clarity. Many transmission owners only manage maintenance, and not operations of their systems. The problem is rooted in the registration where, if an entity does perform TOP reliability tasks, the CEA should force them to be properly registered as a TOP. The Drafting Team has limited ability to address this issue, however, the Drafting Team should recommend that the NERC Functional Model be resurrected and brought up to current industry practices as part of this project.

Industry changes, Markets, technology, and business practices have drastically changed how entities act and interact. The NERC Functional Model was an excellent guidance document for the Drafting Teams to ensure consistency and appropriately assign responsibilities. The industry and Drafting Teams still utilize terms such as "functional obligations" and "reliability tasks", but the original reference of the Functional Model is long gone. These terms are now buzz words with no defined or agreed upon meaning, and they add no clarity to compliance anymore.

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** No

**Document Name**



**Comment**

NPCC RSC agrees with the proposed changes with the removal of the functional obligations in Attachment 1 but suggest splitting out part 1.3 in Attachment 1- Impact Rating Criteria for TOP and TO. The TOP should have similar wording as per the Control Center definition to the RC, BA, and GOP and the TO should be exclusive to part 1.3 wording.

Likes 0

Dislikes 0

**Response****Dave Krueger - SERC Reliability Corporation - 10**

**Answer**

No

**Document Name**

**Comment**

- SERC appreciates the ongoing efforts to refine the CIP-002 standard. SERC does believe that the changes to the criteria do help in addressing the obsolescence of the Functional Model, however it is still not clear in the plain language of the requirement where the 'reliability tasks' of each Responsible Entity are to be derived. To establish a clear linkage for this undefined phrase, perhaps clearly stating that if a task-based responsibility exists in another NERC Reliability Standard, that constitutes a reliability task which bears accounting for in CIP-002-8. Past usage of undefined or non-specific vestigial terminology in CIP-002-5 has led to misunderstanding and inconsistent interpretations.

Likes 0

Dislikes 0

**Response****Jeffrey Streifling - NB Power Corporation - 1**

**Answer**

No

**Document Name**

**Comment**

NPCC RSC agrees with the proposed changes with the removal of the functional obligations in Attachment 1 but suggest splitting out part 1.3 in Attachment 1- Impact Rating Criteria for TOP and TO. The TOP should have similar wording as per the Control Center definition to the RC, BA, and GOP and the TO should be exclusive to part 1.3 wording.

Likes 0

Dislikes 0

**Response****Erin Wilson - NB Power Corporation - New Brunswick Power Transmission Corporation - 5**

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>NPCC RSC agrees with the proposed changes with the removal of the functional obligations in Attachment 1 but suggest splitting out part 1.3 in Attachment 1- Impact Rating Criteria for TOP and TO. The TOP should have similar wording as per the Control Center definition to the RC, BA, and GOP and the TO should be exclusive to part 1.3 wording.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>AECI does agree that references to "functional obligations" should be revised due to the reason cited; however, all references to "reliability tasks" should align with NERC stanandard PER-005-2 language and be referred to as "BES company specific Real-time reliability related tasks" to lessen the opportunity for confusion, auditor interpretation, and reliability gaps.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Ellese Murphy - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>Duke Energy recommends that "reliability tasks" be included in the High Impact Rating Criteria in Attachment 1, 1.3. for Transmission Operators (TOPs) and Transmission Owners (TOs). The "functional obligations" language in CIP-002-5.1a, Attachment 1, 1.3. for the TOP was removed, but not replaced with "reliability tasks". The language "perform the reliability tasks" is included in the draft of CIP-002-8 in Attachment 1, 1.1. for the RC, 1.2 for the BA, and even 1.4. for the GOP, even though PER-005-2 does not include a requirement for the GOP to "create a list of BES company-specific Real-time reliability-related tasks" (<i>reliability tasks list</i>). TOPs and TOs have reliability tasks as well as the other functional entities (RC, BA, GOP) included in Attachment 1, and adding "perform the reliability tasks" to 1.3. would provide consistency. Transmission Owners that have the capability to control Facilities at two or more locations in Real-time using SCADA per the revised Control Center definition, would be required to create a reliability tasks list per PER-005-2. The TO entity developing the reliability tasks list would take into account the direction under their TOP. The intent of adding "perform</p>	

the reliability tasks” to Attachment 1, 1.3. is not necessarily because of or to refer to PER-005-2, but only to point out that a TOP and TO also have reliability tasks.

Likes 0

Dislikes 0

**Response**

**Melanie Wong - Seminole Electric Cooperative, Inc. - 5**

**Answer**

No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer**

Yes

**Document Name**

**Comment**

NV Energy agrees with the term “reliability tasks” and has not identified any concerns over reliability gaps.

Likes 0

Dislikes 0

**Response**

**Marcus Bortman - APS - Arizona Public Service Co. - 6**

**Answer**

Yes

**Document Name**

**Comment**

AZPS supports the use of the term “reliability tasks”, however since it is not a defined term, it will be ambiguous without proper expansion within guidelines and technical basis or some other form of guidance.

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 agrees with the proposed changes for CIP-002-8.

Likes 0

Dislikes 0

**Response**

**Daniel Gacek - Exelon - 1**

**Answer** Yes

**Document Name**

**Comment**

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

Likes 0

Dislikes 0

**Response**

**Kinte Whitehead - Exelon - 3**

**Answer** Yes

**Document Name**

**Comment**

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

Likes 0

Dislikes 0

**Response**

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

**Answer** Yes

**Document Name**

**Comment**

Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South (SIGE) supports the comments as submitted by Edison Electric Institute (EEI).

Likes 0

Dislikes 0

**Response**

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

**Answer** Yes

**Document Name**

**Comment**

Manitoba Hydro is supportive of the changes the drafting team has made and does not see any gaps introduced by the term “reliability tasks”.

Likes 0

Dislikes 0

**Response**

**Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1**

**Answer** Yes

**Document Name**

**Comment**

Please see ACES comments, AEPC has signed on to ACES 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** 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 2

Likes 0

Dislikes 0

**Response**

**David Jendras Sr - Ameren - Ameren Services - 3**

**Answer** Yes

**Document Name**

**Comment**

Ameren agrees with and supports NAGF and EEI comments.

Likes 0

Dislikes 0

**Response**

**Beth Smail - AEP - 1,3,5,6 - MRO,Texas RE,RF**

**Answer** Yes

**Document Name**

**Comment**

AEP agrees with the cited changes in Attachment 1.

Likes 0

Dislikes 0

**Response**

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

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
The MRO NSRF agrees with the term “reliability tasks” and has not identified any concerns over reliability gaps.	
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>	
<b>Comment</b>	
EEI supports the use of the term “reliability tasks” instead of “functional obligations.” We have not identified reliability gaps associated with this change.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Matt Carden - Southern Company - Southern Company Services, Inc. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Southern Company agrees with EEI supporting the use of the term “reliability tasks” instead of “functional obligations.” We have not identified reliability gaps associated with this change.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

**Comment**

CEHE accepts the proposed changes to utilize the term “reliability tasks.” At present, CEHE has not identified any reliability gaps posed by the proposed changes.

Likes 0

Dislikes 0

**Response**

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

**Answer**

Yes

**Document Name**

**Comment**

FirstEnergy has no concerns with the proposed changes.

Likes 0

Dislikes 0

**Response**

**Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**LaTroy Brumfield - LaTroy Brumfield On Behalf of: Amy Wilke, American Transmission Company, LLC, 1; - LaTroy Brumfield**

**Answer**

Yes

**Document Name**

**Comment**



Likes 0

Dislikes 0

**Response**

**Junji Yamaguchi - Hydro-Quebec (HQ) - 1,5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**George E Brown - Pattern Operators LP - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Sandra Pacheco - Silicon Valley Power - City of Santa Clara - 5**

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Jeffrey Ipsaro - Silicon Valley Power - City of Santa Clara - 3,4,5</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Hillary Creurer - Allete - Minnesota Power, Inc. - 1</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>VAL GUZMAN - Silicon Valley Power - City of Santa Clara - 3</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

**Response**

**Stephen Stafford - Stephen Stafford On Behalf of: Greg Davis, Georgia Transmission Corporation, 1; - Stephen Stafford**

**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**

**Israel Perez - Israel Perez On Behalf of: Mathew Weber, Salt River Project, 3, 6, 5, 1; Sarah Blankenship, 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**

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

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Chantal Mazza - Chantal Mazza On Behalf of: Nicolas Turcotte, Hydro-Quebec (HQ), 1, 5; - Chantal Mazza</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Clay Walker - Clay Walker On Behalf of: Robert Hirschak, Cleco Corporation, 6, 5, 1, 3; - Clay Walker</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Donna Wood - Tri-State G and T Association, Inc. - 1</b>	
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**

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

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Stacy Engelmann - City of College Station - 1**

**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	

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

Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Amy Wesselkamper - PNM Resources - Public Service Company of New Mexico - 3

Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Jeremy Lawson - Northern California Power Agency - 3,4,5,6

Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

**Response**

**Ijad Dewan - Ijad Dewan On Behalf of: Emma Halilovic, Hydro One Networks, Inc., 1; - Ijad Dewan**

**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; John Nierenberg, 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**

**James Keele - Entergy - 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**

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

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Gladys DeLaO - CPS Energy - 1,3,5**

**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**

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

**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**

**Adam Peterson - Cedar Falls Utilities - 1****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Rebika Yitna - Rebika Yitna On Behalf of: David Weekley, MEAG Power, 3, 1; - Rebika Yitna****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Roger Perkins - Southern Maryland Electric Cooperative - 1,3****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott****Answer****Document Name****Comment**

ITC has no comment.

Likes 0

Dislikes 0

**Response**

3. The DT reworded the exclusion clause in Criteria 2.12 to provide clarity and to simplify the concepts. Further, the DT replaced the concept of a group of contiguous transmission Elements (GCTE) with the concept of a group of contiguous Elements to clarify that the group of Elements may contain transmission Elements and non-transmission Elements. Lastly, the 75 MW gross export limitation was changed to 75 MWh to appropriately reflect an hourly integrated gross export, as opposed to an instantaneous measurement within the hour. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.

Ijad Dewan - Ijad Dewan On Behalf of: Emma Halilovic, Hydro One Networks, Inc., 1; - Ijad Dewan

Answer No

Document Name

Comment

This criterion should be clearer to identify the associated Transmission BES Cyber System and not the physical Control Center. There are many utilities that operate a Transmission and Distribution function out of the same control center. This would be a good opportunity to clearly articulate the difference between Control Center as a place (physical location) and a device (BES Cyber System controlling the BES as per the definition).

Likes 0

Dislikes 0

Response

Erin Wilson - NB Power Corporation - New Brunswick Power Transmission Corporation - 5

Answer No

Document Name

Comment

This is not specific to this question and may identify an issue that is not technically possible but there is a gap between the X99 and Y00 "Characteristics of Line" levels. A 199.5kV line is not rated on this table.

Request explicit explanation (in the Standard) of the weighted value of zero for "Each BES Transmission Line 500 kV and above." (see Criterion 2.5) We agree with the weighted value. Please correct as needed – we understand that a Control Center with such a Transmission Line is High Impact.

The language for the exemption seems to allow for the exclusion of a Controls Center as medium impact if the load in a set of BES Transmission Lines offsets the generation in another set of BES Transmission Lines, even if these lines are not tied together within the Transmission system controlled by the Control Center.

The 12-month period portion of the language makes it unclear how new transmission lines are handled even if it is known that they will increase the "net export" beyond the 75MW threshold.

The SDT should provide clarity on if a change in the "net export" fluctuates around or exceeds for the first time, the 75MW threshold. When is exceeding the threshold an "unplanned change", allowing for a 2-year implementation and when is it a "planned change" requiring the medium impact implementation to be completed before the threshold is exceeded? If an exempt Control Center loses the exemption, starts the implementation period, gains the exemption before the implementation is completed and then loses the exemption, if there are no other medium impact programs in place, do they always get 2 years to either implement the plan or pray that they gain the exemption before the implementation period is over?

Likes 0

Dislikes 0

**Response**

**Jeffrey Streifling - NB Power Corporation - 1**

**Answer** No

**Document Name**

**Comment**

This is not specific to this question and may identify an issue that is not technically possible but there is a gap between the X99 and Y00 “Characteristics of Line” levels. A 199.5kV line is not rated on this table.

Request explicit explanation (in the Standard) of the weighted value of zero for “Each BES Transmission Line 500 kV and above.” (see Criterion 2.5) We agree with the weighted value. Please correct as needed – we understand that a Control Center with such a Transmission Line is High Impact.

The language for the exemption seems to allow for the exclusion of a Controls Center as medium impact if the load in a set of BES Transmission Lines offsets the generation in another set of BES Transmission Lines, even if these lines are not tied together within the Transmission system controlled by the Control Center.

The 12-month period portion of the language makes it unclear how new transmission lines are handled even if it is known that they will increase the “net export” beyond the 75MW threshold.

The SDT should provide clarity on if a change in the “net export” fluctuates around or exceeds for the first time, the 75MW threshold. When is exceeding the threshold an “unplanned change”, allowing for a 2-year implementation and when is it a “planned change” requiring the medium impact implementation to be completed before the threshold is exceeded? If an exempt Control Center loses the exemption, starts the implementation period, gains the exemption before the implementation is completed and then loses the exemption, if there are no other medium impact programs in place, do they always get 2 years to either implement the plan or pray that they gain the exemption before the implementation period is over?

Likes 0

Dislikes 0

**Response**

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

**Answer** No

**Document Name**

**Comment**

Transmission lines operated at <100kV are not part of the BES and should not be included in the aggregate weighted value model.

Likes 0

Dislikes 0

Response	
<b>Dave Krueger - SERC Reliability Corporation - 10</b>	
<b>Answer</b>	No
<b>Document Name</b>	
Comment	
<ul style="list-style-type: none"> <li>SERC appreciates the ongoing efforts to refine the CIP-002 standard. The changes to the Criterion to improve clarity, however there is still uncertainty and a lack of clarity in the standard or Implementation Plan on the timeline for an entity who exceeds the 75MWH exclusion threshold to recalculate their CIP-002-8 inclusions. We again suggest including a specific example in the Implementation Plan to address this occurrence to reduce ambiguity.</li> </ul>	
Likes	0
Dislikes	0

Response	
<b>Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC</b>	
<b>Answer</b>	No
<b>Document Name</b>	
Comment	
<p>This is not specific to this question and may identify an issue that is not technically possible but there is a gap between the X99 and Y00 “Characteristics of Line” levels. A 199.5kV line is not rated on this table.</p> <p>Request explicit explanation (in the Standard) of the weighted value of zero for “Each BES Transmission Line 500 kV and above.” (see Criterion 2.5) We agree with the weighted value. Please correct as needed – we understand that a Control Center with such a Transmission Line is High Impact.</p> <p>The language for the exemption seems to allow for the exclusion of a Controls Center as medium impact if the load in a set of BES Transmission Lines offsets the generation in another set of BES Transmission Lines, even if these lines are not tied together within the Transmission system controlled by the Control Center.</p> <p>The 12-month period portion of the language makes it unclear how new transmission lines are handled even if it is known that they will increase the “net export” beyond the 75MW threshold.</p> <p>The SDT should provide clarity on if a change in the “net export” fluctuates around or exceeds for the first time, the 75MW threshold. When is exceeding the threshold an “unplanned change”, allowing for a 2-year implementation and when is it a “planned change” requiring the medium impact implementation to be completed before the threshold is exceeded? If an exempt Control Center loses the exemption, starts the implementation period, gains the exemption before the implementation is completed and then loses the exemption, if there are no other medium impact programs in place, do they always get 2 years to either implement the plan or pray that they gain the exemption before the implementation period is over?</p>	
Likes	0
Dislikes	0

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

**Answer** No

**Document Name**

**Comment**

Texas RE continues to be concerned that the way of calculating the risk may not cover all scenarios and does not account for differences in Transmission lines. Texas RE has taken the position that that BCS used to perform the functional obligations of a Transmission Operator should remain categorized as medium impact or high impact. The risk the BCS at a Control Center poses to the reliable operation of the BES is not easily covered by counting the quantity of transmission lines operated. Two Control Centers operating the same number of transmission lines may pose very different risks to the BES. For example, if one Control Center is predominantly operating Transmission lines at substations interconnected with Generation Facilities it may pose more risk than a Control Center operating Transmission lines at substations that are not interconnected with Generation Facilities.

Texas RE proposes the following language for criterion 2.12:

Each Control Center or backup Control Center operated by a Transmission Operator or owned by a Transmission Owner.

Likes 0

Dislikes 0

**Response**

**Kevin Conway - Western Power Pool - 4**

**Answer** No

**Document Name**

**Comment**

Using the 75 MWh gross export is problematic and will lead to gaming. There is no precedent for using a MWh value. Instead, the Drafting Team should consider the maximum line rating, since this allows for any situation where power flows may change.

Likes 0

Dislikes 0

**Response**

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

**Answer** No

<b>Document Name</b>	
<b>Comment</b>	
OPG supports NPCC Regional Standards Committee's comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Melanie Wong - Seminole Electric Cooperative, Inc. - 5</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 concerns with the proposed changes.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Navodka Carter - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	



**CEHE accepts the proposed changes to the exclusion clause in Criteria 2.12.**

Likes 0

Dislikes 0

**Response**

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

**Answer**

Yes

**Document Name**

**Comment**

Duke Energy does not oppose the changes to the exclusion clause .

Likes 0

Dislikes 0

**Response**

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

**Answer**

Yes

**Document Name**

**Comment**

Southern Company agrees with EEI who does not have concerns about the revisions to the exclusion clause.

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; John Nierenberg, 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**

Tacoma Power agrees with the proposed changes, but has a minor comment for clarification in Criteria 2.12. The Criteria 2.12 includes a challenging description of how to determine the aggregate weighted value.

Suggest replacing:

'The "aggregate weighted value" for a Control Center or backup Control Center is determined by summing the "weight value per BES Transmission Line" that is monitored and controlled by the Control Center or backup Control Center shown in the table below.'

With:

'The "aggregate weighted value" for a Control Center or backup Control Center is determined by summing the "weight value per BES Transmission Line" **shown in the table below, for lines** that **are** monitored and controlled by the Control Center or backup Control Center.'

Likes 0

Dislikes 0

### Response

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

**Answer**

Yes

**Document Name**

**Comment**

EEl does not have concerns about the revisions to the exclusion clause.

Likes 0

Dislikes 0

### Response

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

**Answer**

Yes

**Document Name**

**Comment**

The MRO NSRF appreciates the SDT's work to find a balance between ensuring the reliability and security of the BES without unduly burdening smaller entities which pose less risk. The MRO NSRF does not have any specific comments related to the proposed language, given the published results of the DT field tests.

As entities implement the exclusion clause offered in 2.12, the MRO NSRF encourages the use of security awareness efforts and ensuring strong security protections are in place for any Control Center, regardless of impact level or minimum requirements.

Likes	0
Dislikes	0
<b>Response</b>	
<b>Beth Smail - AEP - 1,3,5,6 - MRO,Texas RE,RF</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
AEP does not have concerns about the revisions to the exclusion clause.	
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; 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</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>A note should be added to the table in Impact Rating Criteria 2.12 regarding transmission lines less than 100 kV to clarify that only transmission lines that are less than 100 kV which have been specifically designated as part of the BES via the NERC Rules of Procedure Exception Process (inclusions) are to be used in the calculation of the aggregated weighted value as stated in the Technical Rational. This is important because registered entities are evaluated based on the language in the Standard and not the language in the Technical Rational.</p> <p>For Transmission Operators (TOPs) and Transmission Owners (TOs) with an approved BES Exception (exclusion) for certain facilities, an additional paragraph or bullet should be added to the Exclusion section of Criteria 2.12 to clarify those facilities may be excluded from the calculation of the aggregated weighted value of Criteria 2.12. For example, if a TOP and/or TO has an approved Local Network Exclusion of its 100 kV network, then those transmission lines covered by that approved exclusion are not included in the calculation of aggregated weighted value for Criteria 2.12.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>David Jendras Sr - Ameren - Ameren Services - 3</b>	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
Ameren agrees with and supports NAGF and EEI comments.	
Likes 0	
Dislikes 0	
<b>Response</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>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 3	
Likes 0	
Dislikes 0	
<b>Response</b>	
TRACEY JOHNSON - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South (SIGE) supports the comments as submitted by Edison Electric Institute (EEI).	
Likes 0	
Dislikes 0	
<b>Response</b>	
Kinte Whitehead - Exelon - 3	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
Exelon is responding in support of the EEI to this question.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Daniel Gacek - Exelon - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Exelon is responding in support of the EEI comments to this question.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Marcus Bortman - APS - Arizona Public Service Co. - 6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
AZPS agrees	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Dwanique Spiller - Berkshire Hathaway - NV Energy - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

NV Energy appreciates the SDT's work to find a balance between ensuring the reliability and security of the BES without unduly burdening smaller entities which pose less risk. NV Energy does not have any specific comments related to the proposed language, given the published results of the DT field tests.

As entities implement the exclusion clause offered in 2.12, NV Energy encourages the use of security awareness efforts and ensuring strong security protections are in place for any Control Center, regardless of impact level or minimum requirements.

Likes 0

Dislikes 0

**Response**

**Roger Perkins - Southern Maryland Electric Cooperative - 1,3**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rebika Yitna - Rebika Yitna On Behalf of: David Weekley, MEAG Power, 3, 1; - Rebika Yitna**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Adam Peterson - Cedar Falls Utilities - 1**

**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**

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

**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**

**Gladys DeLaO - CPS Energy - 1,3,5**

<b>Answer</b>	Yes
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<b>Document Name</b>	
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<b>Comment</b>
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Likes 0
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Dislikes 0
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<b>Response</b>
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**Richard Jackson - U.S. Bureau of Reclamation - 1**

<b>Answer</b>	Yes
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<b>Document Name</b>	
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<b>Comment</b>
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Likes 0
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Dislikes 0
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<b>Response</b>
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**Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC CIP**

<b>Answer</b>	Yes
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<b>Document Name</b>	
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<b>Comment</b>
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Likes 0
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Dislikes 0
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<b>Response</b>
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**Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI**

<b>Answer</b>	Yes
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<b>Document Name</b>	
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<b>Comment</b>
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Likes 0

Dislikes 0

**Response**

**James Keele - Entergy - 3**

**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**

**Jeremy Lawson - Northern California Power Agency - 3,4,5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Amy Wesselkamper - PNM Resources - Public Service Company of New Mexico - 3**

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Jessica Cordero - Unisource - Tucson Electric Power Co. - 1</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Stacy Engelmann - City of College Station - 1</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Alison Nickells - NiSource - Northern Indiana Public Service Co. - 1</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

**Response**

**Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1**

**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**

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

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer**

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>Chantal Mazza - Chantal Mazza On Behalf of: Nicolas Turcotte, Hydro-Quebec (HQ), 1, 5; - Chantal Mazza</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: Mathew Weber, Salt River Project, 3, 6, 5, 1; Sarah Blankenship, 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

**Response**

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

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Stephen Stafford - Stephen Stafford On Behalf of: Greg Davis, Georgia Transmission Corporation, 1; - Stephen Stafford**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**VAL GUZMAN - Silicon Valley Power - City of Santa Clara - 3**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer**

Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Jeffrey Ipsaro - Silicon Valley Power - City of Santa Clara - 3,4,5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Sandra Pacheco - Silicon Valley Power - City of Santa Clara - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>George E Brown - Pattern Operators LP - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

**Response**

**Junji Yamaguchi - Hydro-Quebec (HQ) - 1,5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**LaTroy Brumfield - LaTroy Brumfield On Behalf of: Amy Wilke, American Transmission Company, LLC, 1; - LaTroy Brumfield**

**Answer** Yes

**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**

*The NAGF does not have input for this question as our focus is based on the preselective of a GO/GOP.*

Likes 0

Dislikes 0

**Response**

**Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott**

**Answer**

<b>Document Name</b>	
<b>Comment</b>	
ITC has no comment.	
Likes 0	
Dislikes 0	
<b>Response</b>	



4. For the Implementation Plan, the DT elected to retain 24-month window as it aligns with the established 24-month window that is currently provided to Responsible Entities who identify their first high impact or medium impact BES Cyber System. Further, given that the earliest effective date of CIP-002-8 is April 1, 2026 (aligning with the earliest possible effective date of CIP-002-7), entities will have adequate time to evaluate impacts before the 24-month window commences. Do you agree with the proposed changes? If not, please provide the basis for your disagreement and an alternate proposal.

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

**Answer** No

**Document Name**

**Comment**

If HVDC control functions are considered in scope as a Control Center, additional time would be necessary to meet the additional requirements.

Likes 0

Dislikes 0

**Response**

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

**Answer** No

**Document Name**

**Comment**

The proposed 24-month implementation plan has the potential to become very limiting for large entities that could have a large number of new Facilities and facilities due to the current revision of the standard. BPA recommends additional time of 6-12 months to account for updating tools and models in use for the current version of the standard and to allow for changes due to standard effectiveness occurring in the middle of a calendar year.

Likes 0

Dislikes 0

**Response**

**Melanie Wong - Seminole Electric Cooperative, Inc. - 5**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ijad Dewan - Ijad Dewan On Behalf of: Emma Halilovic, Hydro One Networks, Inc., 1; - Ijad Dewan**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Marcus Bortman - APS - Arizona Public Service Co. - 6**

**Answer** Yes

**Document Name**

**Comment**

AZPS agrees

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 agrees with the proposed Implementation Plan.

Likes 0

Dislikes 0

**Response**

**Daniel Gacek - Exelon - 1**

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Exelon is responding in support of the EEI comments to this question.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Kinte Whitehead - Exelon - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Exelon is responding in support of the EEI to this question.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Jay Sethi - Manitoba Hydro - 1,3,5,6 - MRO, Group Name Manitoba Hydro Group</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Manitoba Hydro agrees with the implementation timeline that balances giving entities enough time to complete any required changes while implementing necessary security measures.	
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

**Document Name**

**Comment**

Eergy 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 4

Likes 0

Dislikes 0

**Response**

**David Jendras Sr - Ameren - Ameren Services - 3**

**Answer**

Yes

**Document Name**

**Comment**

Ameren agrees with and supports NAGF and EEI comments.

Likes 0

Dislikes 0

**Response**

**Beth Smail - AEP - 1,3,5,6 - MRO,Texas RE,RF**

**Answer**

Yes

**Document Name**

**Comment**

AEP does not have concerns with the Implementation Plan.

Likes 0

Dislikes 0

**Response**

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

**Answer**

Yes

**Document Name**

**Comment**

EEI does not have concerns with the Implementation Plan.

Likes 0

Dislikes 0

**Response**

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

**Answer**

Yes

**Document Name**

**Comment**

Southern Company agrees with EEI who does not have concerns with the Implementation Plan.

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 the Implementation Plan.

Likes 0

Dislikes 0

**Response**

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

**Answer**

Yes

**Document Name**

**Comment**

CEHE has no comments.

Likes 0

Dislikes 0

**Response**

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

**Answer** Yes

**Document Name**

**Comment**

FirstEnergy has no concerns with the proposed changes.

Likes 0

Dislikes 0

**Response**

**LaTroy Brumfield - LaTroy Brumfield On Behalf of: Amy Wilke, American Transmission Company, LLC, 1; - LaTroy Brumfield**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC**

**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****Junji Yamaguchi - Hydro-Quebec (HQ) - 1,5****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Kevin Conway - Western Power Pool - 4****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

**Response****George E Brown - Pattern Operators LP - 5****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Sandra Pacheco - Silicon Valley Power - City of Santa Clara - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jeffrey Ipsaro - Silicon Valley Power - City of Santa Clara - 3,4,5**

**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	
<b>Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>VAL GUZMAN - Silicon Valley Power - City of Santa Clara - 3</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Stephen Stafford - Stephen Stafford On Behalf of: Greg Davis, Georgia Transmission Corporation, 1; - Stephen Stafford</b>	
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**

**Israel Perez - Israel Perez On Behalf of: Mathew Weber, Salt River Project, 3, 6, 5, 1; Sarah Blankenship, 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**

**Dave Krueger - SERC Reliability Corporation - 10**

**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	
<b>Chantal Mazza - Chantal Mazza On Behalf of: Nicolas Turcotte, Hydro-Quebec (HQ), 1, 5; - Chantal Mazza</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Clay Walker - Clay Walker On Behalf of: Robert Hirschak, Cleco Corporation, 6, 5, 1, 3; - Clay Walker</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Donna Wood - Tri-State G and T Association, Inc. - 1</b>	
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 Schuldts - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer** Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Stacy Engelmann - City of College Station - 1</b>	
<b>Answer</b>	Yes
<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; 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</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
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>	

Likes 0

Dislikes 0

**Response**

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

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jeffrey Streifling - NB Power Corporation - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Erin Wilson - NB Power Corporation - New Brunswick Power Transmission Corporation - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Amy Wesselkamper - PNM Resources - Public Service Company of New Mexico - 3**

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Jeremy Lawson - Northern California Power Agency - 3,4,5,6</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>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; John Nierenberg, 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</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Mike Magruder - Avista - Avista Corporation - 1</b>	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

**Response**

**James Keele - Entergy - 3**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI**

**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**

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



Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Gladys DeLaO - CPS Energy - 1,3,5</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Karen Artola - CPS Energy - 1,3,5 - Texas RE</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	

Dislikes 0

**Response**

**Adam Peterson - Cedar Falls Utilities - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rebika Yitna - Rebika Yitna On Behalf of: David Weekley, MEAG Power, 3, 1; - Rebika Yitna**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Roger Perkins - Southern Maryland Electric Cooperative - 1,3**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott**

**Answer**

<b>Document Name</b>	
<b>Comment</b>	
ITC has no comment.	
Likes 0	
Dislikes 0	
<b>Response</b>	

5. Provide any additional comments for the drafting team to consider, if desired.

**Roger Perkins - Southern Maryland Electric Cooperative - 1,3**

Answer

Document Name

Comment

Thanks to the SDT for it's continued hard work and allowing us to comment.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

No additional comments.

Likes 0

Dislikes 0

Response

**Gladys DeLaO - CPS Energy - 1,3,5**

Answer

Document Name

Comment

CPS Energy does not have any additional comments.

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**

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

**Answer**

**Document Name**

**Comment**

CEHE has no additional comments.

Likes 0

Dislikes 0

**Response**

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

**Answer**

**Document Name**

**Comment**

Duke Energy thanks the Drafting team for their work on the Control Center definition and the CIP-002 revisions.

Likes 0

Dislikes 0

**Response**

**Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI**

**Answer**

<b>Document Name</b>	
<b>Comment</b>	
<p>Why is criterion 2.12 applicable to Transmisison Owners rather than just Transmission Operators? The NERC glossary definitions of each are as follows:</p> <p>Transmisison Owner: The entity that owns and maintains transmission Facilities</p> <p>Transmission Operator: The entity responsible for the reliability of its "local" transmission system, and that operates or directs the operations of the transmission Facilities.</p> <p>This crierion fouses on the capability of a control center to operate certain BES Facilities, which aligns with the Transmisison Operator definition to "operate" transmisison Facilities. The Transmission Owner owns and maintains transmission Facilities by definition, and does not inherently "operate" them. Industry has created a compliance gap via the entity registration process, entities that have been registered only as TOs and operate two or more BES facilities have not been correctly registered as TOPs as well. This creates a reliability gap with PER-005-2 TO applicability and potentially other standard requirements as well.</p> <p>NERC should revisit the registration process for entities that have this reliability gap rather than revise standard requirements to address a registration issue.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Matt Carden - Southern Company - Southern Company Services, Inc. - 1</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>Southern Company does not have any other comments to add.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p><b>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; John Nierenberg, 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</b></p>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	

The Redline to Last Approved and Redline to Last Posted files have editorial errors in the bullets of Criterion 2.12. The 75 MWh in the second bullet is missing the “h”. Additionally, there should be spaces before the “kV” for “60kV” and “300kV”.

Likes 0

Dislikes 0

**Response**

**Erin Wilson - NB Power Corporation - New Brunswick Power Transmission Corporation - 5**

**Answer**

**Document Name**

**Comment**

While the background information for this posting indicates three remaining SARs will be addressed at a later date, addressing the Modifications to CIP-002 and CIP-014 SAR (submitted by the Project 2015-09 Standard Drafting Team chair) should not continue to be delayed. When initially submitted on May 26, 2021, and approved by the Standards Committee on July 21, 2021, this SAR warned of a gap relating to Transmission Planner and Planning Coordinator identification of IROLs that would open if revisions to CIP Standards CIP-002 and CIP-014 were not timely made prior to the Project 2015-09 Operations and Planning Standard revisions going into effect on April 1, 2024, and that gap has now materialized.

Likes 0

Dislikes 0

**Response**

**Jeffrey Streifling - NB Power Corporation - 1**

**Answer**

**Document Name**

**Comment**

While the background information for this posting indicates three remaining SARs will be addressed at a later date, addressing the Modifications to CIP-002 and CIP-014 SAR (submitted by the Project 2015-09 Standard Drafting Team chair) should not continue to be delayed. When initially submitted on May 26, 2021, and approved by the Standards Committee on July 21, 2021, this SAR warned of a gap relating to Transmission Planner and Planning Coordinator identification of IROLs that would open if revisions to CIP Standards CIP-002 and CIP-014 were not timely made prior to the Project 2015-09 Operations and Planning Standard revisions going into effect on April 1, 2024, and that gap has now materialized.

Likes 0

Dislikes 0

**Response**

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

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>"A group of contiguous Elements" (GCE) is described in the Technical Rationale as a concept. Given this is not a defined term in the Glossary of Terms, nor is it planned to be, can the SDT provide additional examples of a GCE and what would (or would not) qualify as a GCE under the proposed 2.12 exclusion criteria?</p> <p>Provide clarity for how HVDC systems are to be considered, specifically when the HVDC local control room only control elements within the HVDC system, including HVDC station to station communication.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<p><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></p>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>Evergy supports and incorporates by reference the comments of the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 5</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<p><b>Alison Nickells - NiSource - Northern Indiana Public Service Co. - 1</b></p>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>NIPSCO believes that the gap that the revised Control Center definition is seeking to address is best addressed in the registration process, not in changing NERC defined terms. Additionally, NIPSCO does not believe it to be consistent with NERC's bright line criteria of 100kV for Transmission Facilities, for the SDT to add "aggregated weight values" in Attachment 1, 2.12 for line voltage that is considered Distribution</p>	
Likes 0	
Dislikes 0	



**Response**

**Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1**

**Answer**

**Document Name**

**Comment**

Thank you for the opportunity to comment.

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**

**Daniel Gacek - Exelon - 1**

**Answer**

**Document Name**

**Comment**

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

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**

**Dave Krueger - SERC Reliability Corporation - 10**

**Answer**

**Document Name**

**Comment**

- SERC appreciates the ongoing efforts to refine the CIP-002 standard. SERC questions the reasoning for the newly added Exemption 4.2.3.3 which broadly excludes whole Cyber Systems within extended ESPs (that could not otherwise be excluded by the ESP exemption in 4.2.3.2). No reference to support such a broad exclusion in the field trial or in the Technical Rationale was found to address any possible reliability gaps caused. This wording also does not address the availability impacts of the loss of such Cyber Assets, which FERC has found to be material in the revisions of standards such as CIP-012.

Likes 0

Dislikes 0

**Response**

**Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott**

**Answer**

**Document Name**

**Comment**

ITC has no comment.

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**

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>While the background information for this posting indicates three remaining SARs will be addressed at a later date, addressing the Modifications to CIP-002 and CIP-014 SAR (submitted by the Project 2015-09 Standard Drafting Team chair) should not continue to be delayed. When initially submitted on May 26, 2021, and approved by the Standards Committee on July 21, 2021, this SAR warned of a gap relating to Transmission Planner and Planning Coordinator identification of IROLs that would open if revisions to CIP Standards CIP-002 and CIP-014 were not timely made prior to the Project 2015-09 Operations and Planning Standard revisions going into effect on April 1, 2024, and that gap has now materialized.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Hillary Creurer - Allete - Minnesota Power, Inc. - 1</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>HVDC lines by nature of how they work demand interaction between the two ends to operate properly. However, they do not have operational control over other transmission elements. Due to how HVDC systems operate, Minnesota Power believes they should be excluded from the definition of a Control Center.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Marcus Bortman - APS - Arizona Public Service Co. - 6</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>AZPS has no additional comments at this time</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	

**Dwanique Spiller - Berkshire Hathaway - NV Energy - 5****Answer****Document Name****Comment**

“A group of contiguous Elements” (GCE) is described in the Technical Rationale as a concept. Given this is not a defined term in the Glossary of Terms, nor is it planned to be, can the SDT provide additional examples of a GCE and what would (or would not) qualify as a GCE under the proposed 2.12 exclusion criteria?

Provide clarity for how HVDC systems are to be considered, specifically when the HVDC local control room only control elements within the HVDC system, including HVDC station to station communication.

Likes 0

Dislikes 0

**Response****Kevin Conway - Western Power Pool - 4****Answer****Document Name****Comment**

We appreciate the efforts of the STD on a very difficult topic. Our overall concern is that the expansion of Control Center to Transmission Owners continues to conflict with the role that TO's play in the functional operation of the BES. We recognize there are TOs which function as TOPs, or agents of TOPs, and expanding the definition of Control Centers does not really address the problems and risks that these entities represent. The exclusion criteria helps, in some cases, to limit compliance to the higher risk entities, however it also creates administrative compliance risk to the smaller agencies.

Likes 0

Dislikes 0

**Response****Constantin Chitescu - Ontario Power Generation Inc. - 5****Answer****Document Name****Comment**

OPG supports NPCC Regional Standards Committee's comments.

Likes 0

Dislikes	0
<b>Response</b>	
Romel Aquino - Edison International - Southern California Edison Company - 3	
<b>Answer</b>	
<b>Document Name</b>	<a href="#">2021-03_Unofficial_Comment_Form_08292024_EEI Final Comments.docx</a>
<b>Comment</b>	
See comments submitted by the Edison Electric Institute	
Likes	0
Dislikes	0
<b>Response</b>	

**Emma Halilovic (via Proxy: Ijad Dewan) – Hydro One Networks, Inc. – 1**

**Question 1:**

**Answer:** No

**Comments:** Clarity on “SCADA system that can control the transmission Facility”. The standard specifically excludes “Field Assets used for Telemetry” but does not also exclude regional data concentrators. The new verbiage only talks about the capability to control -> This needs to be quantified as available operator interfaces designed for control of these 2 or more transmission substations; not the ability to configure an interface for control. An argument can be made that a regional data concentrator "could" be used to issue controls. Although impractical for grid control, however it is possible. Hydro One suggestion is to change "capability" to "authority" in the definition on Pg.2.

**Question 2:**

**Answer:** Yes

**Question 3:**

**Answer:** No

**Comments:** This criterion should be clearer to identify the associated Transmission BES Cyber System and not the physical Control Center. There are many utilities that operate a Transmission and Distribution function out of the same control center. This would be a good opportunity to clearly articulate the difference between Control Center as a place (physical location) and a device (BES Cyber System controlling the BES as per the definition).

**Question 4:**

**Answer:** No

**Comments:** Hydro One’s opinion is that 24 months is not sufficient to implement the changes required to all regional data concentrators in service, if classified as Medium Impact BCS associated with control center, as per the revised Control Center definition.