

Comment Report

Project Name: 2025-02 Internal Network Security Monitoring Standard Revision | SAR
Comment Period Start Date: 7/17/2025
Comment Period End Date: 8/15/2025
Associated Ballots:

There were 33 sets of responses, including comments from approximately 99 different people from approximately 65 companies representing 8 of the Industry Segments as shown in the table on the following pages.

Questions

- 1. Do you agree with the proposed scope as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope, please provide your recommendation and explanation.**
- 2. Provide any additional comments for the SAR 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
Dominion - Dominion Resources, Inc.	Barbara Marion	5,6		Dominion	Victoria Crider	Dominion	3	NA - Not Applicable
					Barbara Marion	Dominion	5	NA - Not Applicable
					Sean Bodkin	Dominion	6	NA - Not Applicable
					Steven Belle	Dominion	1	NA - Not Applicable
WEC Energy Group, Inc.	Christine Kane	3,4,5,6		WEC Energy Group	Christine Kane	WEC Energy Group, Inc.	3	RF
					Michelle Hribar	WEC Energy Group, Inc.	5	RF
					David Boeshaar	WEC Energy Group, Inc.	6	RF
					Candace Morakinyo	WEC Energy Group, Inc.	4	RF
Black Hills Corporation	Josh Schumacher	1,3,5,6		Black Hills Corporation Segments 1, 3, 5, 6	Trevor Rombough	Black Hills Corporation	1	WECC
					Josh Combs	Black Hills Corporation	3	WECC
					Sheila Suurmeier	Black Hills Corporation	5	WECC
					Josh Schumacher	Black Hills Corporation	6	WECC
Eversource Energy	Joshua London	1,3		Eversource	Joshua London	Eversource Energy	1	NPCC
					Vicki O'Leary	Eversource Energy	3	NPCC
FirstEnergy - FirstEnergy Corporation	Mark Garza	1,3,4,5,6		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
California ISO	Monika Montez	2	WECC	ISO/RTO Council Standards Review Committee (SRC)	Monika Montez	CAISO	2	WECC
					John Pearson	ISO New England, Inc.	2	NPCC
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Kennedy Meier	Electric Reliability Council of Texas, Inc.	2	Texas RE
					Elizabeth Davis	PJM	2	RF
					Kirsten Rowley	Midcontinent ISO, Inc.	2	MRO
					Joshua Phillips	Southwest Power Pool, Inc. (RTO)	2	MRO
OGE Energy - Oklahoma Gas and Electric Co.	Patrick Wells	1,3,5,6		OGE_UOC	Terri Pyle	OG&E	1	MRO
					Donald Hargrove	OG&E	3	MRO
					Patrick Wells	OG&E	5	MRO
					Ashley Stringer	OG&E	6	MRO
Northeast Power Coordinating Council	Ruida Shu	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	1	NPCC

	Edison Co. of New York		
David Burke	Orange and Rockland	3	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
Sean Cavote	PSEG	4	NPCC
Jason Chandler	Con Edison	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
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
Emma Halilovic	Hydro One	1,3	NPCC

					Philip Nichols	National Grid	1	NPCC
					Emma Halilovic	Hydro One	1,3	NPCC
					Caver Powers	Utility Services	5	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

1. Do you agree with the proposed scope as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope, please provide your recommendation and explanation.

James Keele - Entergy - 1,3,6

Answer No

Document Name

Comment

This extends the scope of INSM outside of what it is intended to do. The expansion can be intrusive to an entities network putting an undo burden on the entity. This is not a cost effective solution nor does it provide any protection inside the network.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

By implying some kind of logical boundary for security monitoring for EACMS/PACS would essentially create another ESP like construct. This would have to be defined, tracked and have other routable connected devices afforded some reasonable minimum level of security. This would be a large expansion of coverage for the CIP standards.

The ideation of this expansion seems to imply a level of security and reliability for links between EACMS and their respective ESPs. This really could open the door to CIP-012 like controls for those communication paths that would add additional overall documentation to prove compliance for all those distributed links. While this would undoubtedly drive a higher security posture, it would also incur a significant burden to adequately prove the required protections have been afforded.

Likes 0

Dislikes 0

Response

Richard Vendetti - NextEra Energy - 5

Answer No

Document Name

Comment

The SAR proposes to expand monitoring of the EACMS and PACS “CIP-network environment”. This scoping of the entire CIP-network environment where EACMS and PACS reside implies monitoring of all non-CIP Cyber Asset communication as well. This could present a challenge as the EACMS and PACS CIP-network could have many Cyber Assets that do not provide those functions. The SAR may indirectly imply that a dedicated network be created for only EACMS and PACS in order to support the monitoring in an efficient manner and potentially reduce noise from those non-CIP Cyber Assets which will detract from real security events due to the increased volume.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter

Answer No

Document Name

Comment

FirstEnergy suggests adding a reference to NERC's Request for Clarification that was filed with FERC on July 25, 2025. The filing seeks clarification of the intended scope of the revisions and is relevant to include in the Project Scope and/or Detailed Description section of the SAR.

Likes 0

Dislikes 0

Response

Timothy Singh - Salt River Project - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Including EACMS and PACS outside of the ESP has the potential to greatly expand the scope of CIP far beyond what is currently included. This could have significant financial and workforce implications. Also, extending the INSM to include EACMS and PACs outside of the ESP could potentially duplicate chatty network traffic.

There needs to be additional research and guidance on acceptable solutions to the SAR's concerns.

Likes 0

Dislikes 0

Response

Erik Gustafson - TXNM Energy - 1,3 - WECC,Texas RE	
Answer	No
Document Name	
Comment	
<p>Under the “Detailed Description” heading, the third bullet point reads that modifications should be made in accordance with “Communication between PACS and controllers...”. TXNM would like further explanation and clarification as to what is designated a “controller” in this instance as this is not a NERC defined term.</p> <p>The Communications Scope diagram shown in the Technical Rationale for Project 2023-03 Internal Network Security Monitoring depicts the in-scope communications between PACS and EACMS as part of the CIP-networked environment. However, this diagram example displays the corporate network outside of the CIP-networked environment. This diagram seems to represent one type of environment as a one-size-fits-all approach to how entities construct their networks, but this is not representative of all potential network configurations. TXNM specifically wants to ensure that FERC and the Standards Drafting Team consider that PACS are not necessarily configured discretely as shown on this diagram, and many entities do indeed configure their PACS to reside on the corporate network. It is unclear if communications between PACS on the Corporate network and devices within the CIP-networked environment would be in scope. If PACS on a Corporate network were unintentionally left off of in-scope applicability but need to be included, it could become an undue burden to move PACS off of a corporate network and onto subnets within substations that are in scope.</p>	
Likes 0	
Dislikes 0	
Response	
Marvin Johnson - DTE Energy - Detroit Edison Company - 3	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Misty Carneal - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
<p>Duke Energy supports EEI comments.</p>	

Likes 0	
Dislikes 0	
Response	
Patrick Wells - OGE Energy - Oklahoma Gas and Electric Co. - 1,3,5,6, Group Name OGE_UOC	
Answer	Yes
Document Name	
Comment	
Agree with MRO NSRF	
Likes 0	
Dislikes 0	
Response	
Randy Peters - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
<p>Manitoba Hydro agrees with the scope proposed in the SAR and appreciates the concise text giving the drafting team latitude to achieve the scope. Manitoba Hydro understands that the exact wording from FERC Order No. 907 was used but suggest that the detailed description be modified to ensure that the scope is clear and includes all communication links:</p> <p>The scope of CIP-networked environment includes the systems within the ESP and one or more of the following:</p> <p>(1) network segments that are connected to EACMS and PACS outside of the ESP;</p> <p>(2) network segments between any of the following: EACMS outside of the ESP, PACS outside of the ESP and EACMS that contain Access Points to an ESP;</p> <p>(3) network segments that are internal to EACMS and PACS outside of the ESP;</p> <p>This includes Communication between PACS and controllers and communications to and from EACMS used solely for electronic access monitoring are included in the term CIP-networked environment.</p>	
Likes 0	
Dislikes 0	
Response	

Alan Kloster - Evergy - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and the MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Andrew Smith - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
AZPS agrees with the proposed scope described in the SAR. AZPS agrees with comments submitted by EEI on behalf of their members to suggest adding a reference to NERC's Request for Clarification that was filed with FERC on July 25, 2025, seeking clarification on the intended scope of the revisions that is relevant to this project.	
Likes 0	
Dislikes 0	
Response	
Dante Jackson - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
<p>CEHE is concerned that the scope of the SAR could lead to broad interpretation of the intended scope and encourages NERC to add a reference to their submitted request for clarification. Additionally, we ask the Drafting Team to consider documenting, in technical rationale or guidance, clear information on the scope of EACMS and PACS, and ways entities can implement the controls as intended. We provide these scenarios for consideration:</p> <ul style="list-style-type: none"> • EACMS and PACS may be placed on any network, ranging from the Registered Entity's Enterprise environment, cloud-based SaaS, and even air-gapped networks at remote locations. These assets may be mixed use, providing access control for any number regulated and non-regulated systems or physical facilities. • Local networks of EACMS and PACS may be mutually exclusive. 	

<ul style="list-style-type: none"> Clarification of what is meant by “network segments that are internal to EACMS and PACS.” For EACMS, it could be understood to include management network(s) joining different EACMS, if they exist. However, for PACS, it could mean the network(s) between PACS and the locally mounted hardware or devices at the Physical Security Perimeter, which are explicitly out of scope, per NERC CIP-006. The concept of baselining and monitoring network activity for anomalies is entity-defined and could vary. Given the expansion in scope outside of the ESP, it would be valuable to provide guidance and best practices to help entities ensure that the thresholds they are setting can add value from a risk reduction perspective. 	
Likes 0	
Dislikes 0	
Response	
Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
<p>EEI agrees with the proposed scope as described in the SAR and suggests adding a reference to NERC’s Request for Clarification that was filed with FERC on July 25, 2025, to the Project Scope and Detailed Description sections. The filing seeks clarification on the intended scope of the revisions and is relevant to include in the Project Scope and/or Detailed Description sections of the SAR.</p>	
Likes 0	
Dislikes 0	
Response	
Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
<p>SPP agrees that the scope of the SAR meets the directive in FERC Order No. 907.</p> <p>SPP also supports the comments submitted by the ISO/RTO Council (IRC) Standards Review Committee (SRC)</p>	
Likes 0	
Dislikes 0	
Response	
Amy Wilke - American Transmission Company, LLC - 1	
Answer	Yes

Document Name	
Comment	
<p>ATC supports the proposed modifications outlined in the SAR for Project 2025-02, particularly the extension of Internal Network Security Monitoring (INSM) to include Electronic Access Control or Monitoring Systems (EACMS) and Physical Access Control Systems (PACS) outside the Electronic Security Perimeter (ESP).</p> <p>This is necessary to help mitigate the risk of:</p> <ol style="list-style-type: none"> 1. Malicious communications riding through an Electronic Access Point (EAP) into an ESP by misusing trusted communications from an EACMS, and 2. Physical compromise caused by malicious communications riding trusted communications from PACS and leading to misuse or loss of implemented physical security controls. <p>One effective way to do that, at a minimum, would be to monitor all communications to/from applicable EACMS or PACS. Extending the monitoring to all communications (based on risk) with the subnets that house an EACMS or PACS is a logical progression for CIP-015. This may result in some organizations redesigning their networks (i.e., further segmentation), which would ultimately be an improvement in security posture.</p> <p>The SAR would benefit from clearer delineation of the monitoring scope. Specifically, it should define what constitutes “applicable communications” and how monitoring should be implemented across subnets housing EACMS and PACS. Without this clarity, entities may interpret the scope inconsistently, leading to uneven compliance and audit outcomes.</p> <p>The use of general terms such as “controllers” in the SAR may introduce ambiguity, especially when contrasted with the more specific “CIP-networked environment.” ATC requests the drafting team consider establishing a formal definition for “CIP-networked environment” to ensure consistent interpretation and application across entities. This will help avoid conflicts in environments where “controllers” may not align with CIP applicability criteria.</p>	
Likes 0	
Dislikes 0	
Response	
Josh Schumacher - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation Segments 1, 3, 5, 6	
Answer	Yes
Document Name	
Comment	
<p>Black Hills Corporation agrees with EEI's comments.</p>	
Likes 0	
Dislikes 0	
Response	
Monika Montez - California ISO - 2 - WECC, Group Name ISO/RTO Council Standards Review Committee (SRC)	

Answer	Yes
Document Name	
Comment	
<p>While it can be agreed that the scope of the SAR meets the intent of the directive in FERC Order No. 907, there are additional clarifications needed in order for the SAR to proceed to standard development. The term “CIP-networked environment” does not have a formal definition, which could result in additional scope creep of CIP-015 and continued ambiguity about the full scope of this standard. On July 25, 2025, NERC filed a request for clarification^[1] with FERC seeking additional guidance related to the term “CIP-networked environment” to eliminate ambiguity regarding the intended scope of the Commission’s directive. The Standard Drafting Team should consider creating a new NERC-defined term for “CIP-networked environment” or perhaps even “CIP Trust Zone”. However, it would not be appropriate to move this SAR forward until a response to the July 25 request for clarification is received from FERC, as FERC’s response may require further scope changes and corresponding modifications to the <i>detailed description</i> portion of the SAR.</p> <p>Additionally, the Project Scope should be revised to eliminate duplicative references to <i>associated EACMS and PACS</i>. The current language states, “<i>The scope of this project encompasses the extension of INSM to EACMS and PACS that are associated with the following BCS impact categories:</i></p> <ul style="list-style-type: none"> · <i>High impact BCS and their associated EACMS and PACS; and</i> · <i>Medium impact BCS with External Routable Connectivity (ERC) and their associated EACMS and PACS.”</i> <p>Instead, the scope should state,</p> <p>“<i>The scope of this project encompasses the extension of INSM to EACMS and PACS that are associated with the following BCS impact categories:</i></p> <ul style="list-style-type: none"> · <i>High impact BCS; and</i> · <i>Medium impact BCS with External Routable Connectivity (ERC).”</i> <p>This removes any duplication or ambiguity around what is truly in scope.</p> <p>[1] INSM Clarification July 25 2INSM Clarification July 25 2025 digicert.pdf</p> 	
Likes 0	
Dislikes 0	
Response	
Fausto Serratos - Los Angeles Department of Water and Power - 1,3,5,6	
Answer	Yes
Document Name	2025-02 Unofficial_Comment_Form SAR_0811.pdf
Comment	
<p>No concerns with the proposed inclusion of EACMS within or beyond the ESP under foundation set in CIP-015-1. However, we oppose the addition of PACS to the scope of INSM due to architectural and compliance complexities.</p>	
Likes 0	

Dislikes	0
Response	
Nick Leathers - Ameren - Ameren Services - 1,3,5,6 - MRO,SERC	
Answer	Yes
Document Name	
Comment	
Ameren agrees with EEI's comments.	
Likes	0
Dislikes	0
Response	
Gail Elliott - International Transmission Company Holdings Corporation - 1 - MRO,RF	
Answer	Yes
Document Name	
Comment	
ITC supports the comments submitted by EEI	
Likes	0
Dislikes	0
Response	
Barbara Marion - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Dominion Energy supports the comments submitted by EEI.	
Likes	0
Dislikes	0
Response	

Jodi Yeary - AEP - 3,5,6

Answer Yes

Document Name [AEP_DRAFT-2025-02 Unofficial_Comment_Form SAR_071725.pdf](#)

Comment

AEP agrees with the SAR pending the proposed edits to the Detailed Description Section as denoted by in **bold font**:

- The scope of CIP-networked environment includes the systems within the ESP and one or more of the following: (1) network segments that are connected to the EACMS and PACS outside of the ESP; (2) network segments between **and among any of the following: EACMS outside of the ESP, PACS outside of the ESP and EACMS that contain Access Points to an ESP**; (3) network segments that are internal to **EACMS and PACS outside of the ESP**.
- **This includes communication between PACS and controllers and communication to and from EACMS used solely for electronic access monitoring.**
- **The CIP-networked environment is made up of Cyber Systems in scope of NERC CIP compliance and does not include corporate business system or communication systems.**

AEP is closely monitoring FERC's pending response to NERC's request for [clarification](#).

Attached is AEP's comments with formatting for clarity.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group

Answer Yes

Document Name

Comment

WEC Energy Group supports the comments of EEI as follows:

EEI agrees with the proposed scope as described in the SAR and suggests adding a reference to NERC's Request for Clarification that was filed with FERC on July 25, 2025, to the Project Scope and Detailed Description sections. The filing seeks clarification on the intended scope of the revisions and is relevant to include in the Project Scope and/or Detailed Description sections of the SAR.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 1,3

Answer	Yes
Document Name	
Comment	
Exelon is aligned with the EEI in response to this question. Both Segments 1 and 3	
Likes 0	
Dislikes 0	
Response	
Jessica Cordero - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC CIP	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 10, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	

Likes	0	
Dislikes	0	
Response		
Joshua London - Eversource Energy - 1,3, Group Name Eversource		
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		
Jennifer Buckman - Southern Indiana Gas and Electric Co. - 3,5,6 - RF		
Answer	Yes	
Document Name		
Comment		
Likes	0	
Dislikes	0	
Response		
James Merlo - NAGF - NA - Not Applicable - NA - Not Applicable		

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruchi Shah - AES - AES Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

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

Kinte Whitehead - Exelon - 1,3

Answer

Document Name

Comment

Exelon is aligned with the EEI in response to this question. Both Segments 1 and 3

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group

Answer

Document Name

Comment

WEC Energy Group supports the comments of EEI as follows:

The "SAR Status Tracking Section" should also include checks for "Draft SAR presented to SC for acceptance" and "DRAFT SAR approved for posting by the SC." The "Risk Tracking" section should include a check for "Security Risks."

Likes 0

Dislikes 0

Response

Jodi Yeary - AEP - 3,5,6

Answer

Document Name

Comment

The proposed SAR would introduce additional costs and operational complexity. While these systems are outside the core reliability functions of the grid, their inclusion would require significant upfront investment, ongoing maintenance, and could delay implementation efforts.

To effectively manage this expanded scope, the implementation timeline should be extended to ensure adequate time for compliance planning and execution.

Likes 0	
Dislikes 0	
Response	
Barbara Marion - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion	
Answer	
Document Name	
Comment	
Dominion Energy supports the comments submitted by EEI.	
Likes 0	
Dislikes 0	
Response	
Gail Elliott - International Transmission Company Holdings Corporation - 1 - MRO,RF	
Answer	
Document Name	
Comment	
ITC supports the comments submitted by EEI	
Likes 0	
Dislikes 0	
Response	
Nick Leathers - Ameren - Ameren Services - 1,3,5,6 - MRO,SERC	
Answer	
Document Name	
Comment	
Ameren agrees with EEI's comments.	
Likes 0	

Dislikes	0
Response	
Fausto Serratos - Los Angeles Department of Water and Power - 1,3,5,6	
Answer	
Document Name	
Comment	
<p>Integrating PACS into CIP-015-1 presents significant challenges for entities with older architectures, especially when PACS components are hosted on non-CIP Cyber Assets or have historically been excluded from the Electronic Security Perimeter (ESP). These legacy systems often lack the network visibility and telemetry required for INSM, making compliance difficult without substantial upgrades. Including PACS in the CIP-networked environment would require reclassification of assets, redesign of network boundaries, and implementation of new monitoring and data protection mechanisms—efforts that can be both technically complex and resource-intensive.</p> <p>Additionally, PACS systems outside the ESP may not support secure logging or data retention standards mandated by CIP-015-1, creating visibility gaps and compliance risks. Entities must also navigate the operational burden of updating inventories, training personnel, and ensuring proper asset classification to avoid introducing vulnerabilities.</p>	
Likes	0
Dislikes	0
Response	
Monika Montez - California ISO - 2 - WECC, Group Name ISO/RTO Council Standards Review Committee (SRC)	
Answer	
Document Name	
Comment	
<p>INSM is an expensive solution for entities with large in-scope environments as referenced in the Cost Impact Assessment section of the SAR, costing ratepayers in some regions approximately \$400,000 annually as currently scoped in CIP-015-1 (some ISOs/RTOs have already adopted a solution designed to meet the INSM requirement, so these are real costs, not estimates). Including EACMS monitoring could mean that the syslog servers that monitor authentication traffic would need to have all incoming logs monitored by the INSM solution, which would result in a massive data retention requirement and a significant increase in these costs. This further highlights the need for clear, explicit language detailing the in-scope network segments and communication paths within any revised CIP-015 requirements to ensure unnecessary cost burdens are not imposed on Responsible Entities and ratepayers as a result of conflicting interpretations of a revised CIP-015.</p> <p>Additionally, the CIP standards do not seem to address basic network-layer protections around EACMS and PACS, which seems to be a much larger security gap than the absence of a standard that simply requires monitoring for anomalous traffic, which is less effective at preventing an attack due to the observational nature of Network Detection and Response solutions.</p>	
Likes	0
Dislikes	0

Response	
Josh Schumacher - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation Segments 1, 3, 5, 6	
Answer	
Document Name	
Comment	
Black Hills Corporation does have concerns that the proposed language is overly vague and could be interpreted by an auditor as including systems that should remain outside the scoping, e.g. a badge reader system in a remote office that otherwise has no other NERC/CIP assets.	
Likes 0	
Dislikes 0	
Response	
Amy Wilke - American Transmission Company, LLC - 1	
Answer	
Document Name	
Comment	
The drafting team's consideration of a defined term for "CIP Networked Environment." would help reduce the risk of ambiguity in the future standard language and ensure all entities are audited to the same standards. One approach ATC can offer for DT consideration is something like, but not limited to, the following: "CIP Networked Environment IP subnet(s) or network segment(s) that house one or more of the following Applicable Systems: <ul style="list-style-type: none">• High impact BCS and their associated EACMS, PACS, and PCA• Medium impact BCS with ERC and their associated EACMS, PACS, and PCA"	
Likes 0	
Dislikes 0	
Response	
Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC	
Answer	
Document Name	
Comment	

SPP acknowledges that NERC has sought clarification from FERC regarding the CIP-networked environment and supports this request. Such clarification would assist the drafting team in determining whether the term CIP-networked environment is intended to include only the communication paths between the CIP devices for monitoring; or does the scope of CIP-networked environment intend to include all communications on the network segment. or if FERC intended it to inclusive of communications between PACS and non-PACS controllers.	
SPP also supports the comments submitted by the ISO/RTO Council (IRC) Standards Review Committee (SRC	
Likes 0	
Dislikes 0	
Response	
James Merlo - NAGF - NA - Not Applicable - NA - Not Applicable	
Answer	
Document Name	
Comment	
THE NAGF agrees with EEI's commments, specifically, the suggestion made to add a reference to NERC's Request for Clarification that was filed with FERC on July 25, 2025, to the Project Scope and Detailed Description sections. This filing seeks clarification on the intended scope of the revisions and is relevant to include in the Project Scope and/or Detailed Description sections of the SAR.	
Likes 0	
Dislikes 0	
Response	
Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	
Document Name	
Comment	
The "SAR Status Tracking Section" should also include checks for "Draft SAR presented to SC for acceptance" and "DRAFT SAR approved for posting by the SC." The "Risk Tracking" section should include a check for "Security Risks."	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter	

Answer	
Document Name	
Comment	
<p>Further, as the scope of CIP-015-2 is stated, this is an enormous potential undertaking with significant cost that has very limited improved security. This rule's scope and cost is not risk informed.</p> <p>Standards Drafting from this SAR relies on FERC's comments on "CIP networked environment" to be scoped appropriately to applying to EACMS and PACS device interfaces with BES Cyber Systems only, and exclude other types of interfaces and links that are otherwise out of scope for CIP.</p>	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Evergy - 1,3,5,6 - MRO	
Answer	
Document Name	
Comment	
<p>Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and the MRO NSRF.</p>	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
<p>Texas RE supports the SAR.</p>	
Likes 0	
Dislikes 0	
Response	
Marvin Johnson - DTE Energy - Detroit Edison Company - 3	

Answer	
Document Name	
Comment	
<p>I believe the original scope was more reasonable. EACMS and PACS are not required to be in an ESP, because they are only monitoring systems. Originally excluding them from the scope was logical.</p>	
Likes 0	
Dislikes 0	
Response	
Ijad Dewan - Hydro One Networks, Inc. - 1 - NPCC	
Answer	
Document Name	
Comment	
<p>In principle this SAR is a step in the right direction. However, more analysis needs to be done on the scope of the SAR. Is INSM required for the monitoring part of EACMS?</p>	
Likes 0	
Dislikes 0	
Response	
Joshua London - Eversource Energy - 1,3, Group Name Eversource	
Answer	
Document Name	
Comment	
<ol style="list-style-type: none"> The SAR states “The scope of CIP-networked environment includes the systems within the ESP and one or more of the following: (1) network segments that are connected to EACMS and PACS outside of the ESP;” <ul style="list-style-type: none"> This needs clarity to specify that the network segment intended to be monitored is between the EACMS and PACS and the ESP The proposed language is “(1) Network segments originating from an ESP connecting to EACMS and PACS residing outside the ESP.” The second concern identified is related to the following language used “Communication between PACS and controllers and communications to and from EACMS used solely for electronic access monitoring are included in the term CIP-networked environment.” <ul style="list-style-type: none"> Eversource is seeking clarification on what "controllers" are intended to be in scope. Is it meant to be specific to domain controllers as per the CISA paper cited in FERC Order 907, or something else?” 	

Likes	0
Dislikes	0
Response	
Ruida Shu - Northeast Power Coordinating Council - 10, Group Name NPCC RSC	
Answer	
Document Name	
Comment	
<p>The NPCC Regional Standards Committee (RSC) is concerned about various projects that are modifying and impacting the definitions of EACMS and PACS. These changes could lead to confusion or conflict with existing definitions and other NERC projects. For example, Project 2023-09 may affect how EACMS and PACS are defined and implemented.</p> <p>The RSC recommends evaluating the network traffic traversing EACMS and PACS, rather than establishing a “trust zone” or defining a “CIP-networked environment.”</p> <p>The SAR states “The scope of CIP-networked environment includes the systems within the ESP and one or more of the following: (1) network segments that are connected to EACMS and PACS outside of the ESP;”</p> <ol style="list-style-type: none"> 1. <ol style="list-style-type: none"> i. This needs clarity to specify that the network segment intended to be monitored is between EACMS and PACS and the ESP ii. The proposed language is “(1) Network segments originating from an ESP connecting to EACMS and PACS residing outside the ESP.” <p>The second concern identified is related to the following language used “Communication between PACS and controllers and communications to and from EACMS used solely for electronic access monitoring are included in the term CIP-networked environment.”</p> <p>The NPCC RSC is seeking clarification on what "controllers" are intended to be in scope. Is it meant to be specific to domain controllers as per the CISA paper cited in FERC Order 907, or something else?”</p>	
Likes	0
Dislikes	0
Response	
James Keele - Entergy - 1,3,6	
Answer	
Document Name	
Comment	
Do not expand the scope!	
Likes	0

Dislikes 0	
Response	
Misty Carneal - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF	
Answer	
Document Name	
Comment	
Duke Energy does not have any additional comments.	
Likes 0	
Dislikes 0	
Response	