

## Comment Report

**Project Name:** 2016-02 Modifications to CIP Standards | CIP-002-6 (Draft 4)  
**Comment Period Start Date:** 11/1/2019  
**Comment Period End Date:** 12/16/2019  
**Associated Ballots:** 2016-02 Modifications to CIP Standards CIP-002-6 AB 4 ST

There were 52 sets of responses, including comments from approximately 119 different people from approximately 93 companies representing 10 of the Industry Segments as shown in the table on the following pages.

## Questions

- 1. Attachment 1, Criterion 2.12: Modifications were made to the Attachment 1, Criterion 2.12 to provide clarity. Do you agree with the proposed modifications in CIP-002-6 Attachment 1, Criterion 2.12? If not, please provide your rationale and an alternate proposal.**
- 2. Based on comments received from industry, the SDT reverted the Planned and Unplanned Changes section back to current state by removing it from the Effective Date section of CIP-002-6 and moving the existing language from the CIP-002-5.1a Implementation Plan into the CIP-002-6 Implementation Plan (with only updates to version information). Do you agree with the proposed modification? If no, please provide your rationale and an alternate proposal.**
- 3. The SDT believes proposed modifications in CIP-002-6 provide entities with flexibility to meet the reliability objectives in a cost effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.**
- 4. If you have additional comments on the proposed CIP-002-6 that you have not provided in response to the questions above, please provide them here.**

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Douglas Webb	Douglas Webb		MRO,SPP RE	Westar-KCPL	Doug Webb	Westar	1,3,5,6	MRO
					Doug Webb	KCP&L	1,3,5,6	MRO
ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,NA - Not Applicable,RF,SERC,Texas RE,WECC	ACES Standard Collaborations	Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1	SERC
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Bill Hutchison	Southern Illinois Power Cooperative	1	SERC
					Amber Skillern	East Kentucky Power Cooperative	1	SERC
					Eric Jensen	Arizona Electric Power Cooperative	1	WECC
					Shari Heino	Brazos Electric Power Cooperative, Inc.	5	Texas RE
					Joseph Smith	Prairie Power , Inc.	1,3	SERC
					Carl Behnke	Southern Maryland Electric Cooperative	3	RF
					Tara Lightner	Sunflower Electric Power Cooperative	1	MRO
					Susan Sosbe	Wabash Valley Power Association	3	RF
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
					Ann Carey	FirstEnergy - FirstEnergy Solutions	6	RF
					Mark Garza	FirstEnergy-FirstEnergy	4	RF
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					William D. Shultz	Southern Company Generation	5	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC

Michele Tondalo	UI	1	NPCC
Helen Lainis	IESO	2	NPCC
Sean Cavote	PSEG	4	NPCC
Kathleen Goodman	ISO-NE	2	NPCC
David Kiguel	Independent	NA - Not Applicable	NPCC
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC
Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
Nick Kowalczyk	Orange and Rockland	1	NPCC
Joel Charlebois	AESI - Acumen Engineered Solutions International Inc.	5	NPCC
Mike Cooke	Ontario Power Generation, Inc.	4	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Shivaz Chopra	New York Power Authority	5	NPCC
Mike Forte	Con Ed - Consolidated Edison	4	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Ashmeet Kaur	Con Ed - Consolidated Edison	5	NPCC

					Caroline Dupuis	Hydro Quebec	1	NPCC
					Chantal Mazza	Hydro Quebec	2	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
					Laura McLeod	NB Power Corporation	5	NPCC
					Randy MacDonald	NB Power Corporation	2	NPCC
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					John Hastings	National Grid	1	NPCC
					Michael Jones	National Grid USA	1	NPCC
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
					Stephen Pogue	M and A Electric Power Cooperative	3	SERC
					William Price	M and A Electric Power Cooperative	1	SERC
					Jeff Neas	Sho-Me Power Electric Cooperative	3	SERC
					Peter Dawson	Sho-Me Power	1	SERC

	Electric Cooperative		
Mark Ramsey	N.W. Electric Power Cooperative, Inc.	1	NPCC
John Stickley	NW Electric Power Cooperative, Inc.	3	SERC
Tony Gott	KAMO Electric Cooperative	3	SERC
Micah Breedlove	KAMO Electric Cooperative	1	SERC
Kevin White	Northeast Missouri Electric Power Cooperative	1	SERC
Skyler Wiegmann	Northeast Missouri Electric Power Cooperative	3	SERC
Ryan Ziegler	Associated Electric Cooperative, Inc.	1	SERC
Brian Ackermann	Associated Electric Cooperative, Inc.	6	SERC
Brad Haralson	Associated Electric Cooperative, Inc.	5	SERC

**1. Attachment 1, Criterion 2.12: Modifications were made to the Attachment 1, Criterion 2.12 to provide clarity. Do you agree with the proposed modifications in CIP-002-6 Attachment 1, Criterion 2.12? If not, please provide your rationale and an alternate proposal.**

**Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1,3,5,6**

**Answer** No

**Document Name**

**Comment**

The changes add clarification, however, the extremely long sentences are awkward and will cause confusion in application of the approved standards.

Likes 0

Dislikes 0

**Response**

**James Baldwin - Eugene Water and Electric Board - 1,3 - WECC**

**Answer** No

**Document Name**

**Comment**

EWEB believes that criterion 2.12 places undue hardship on utilities that have a robust system. EWEB's system is designed to provide reliable load; however, due to the new, ambiguous aggregate rating, EWEB would be classified as a Medium Impact entity. The new criterion places undue hardships on smaller utilities that do not have the resources available to efficiently comply with the CIP Medium Impact Standards.

Instead of the SDT pulling more entities into the Medium Impact Category, EWEB suggests that the CIP Low requirements be enhanced to establish greater Critical Infrastructure Protection. The difference between the CIP Low and CIP Medium Requirements is drastic, closing this gap would enhance security without over-burdening smaller entities that pose little to no threat to the BES.

An alternative to the aggregate weight of number of lines a Transmission Owner has could be the total distance of lines owned in kV categories.

Likes 0

Dislikes 0

**Response**

**Anthony Jablonski - ReliabilityFirst - 10**

**Answer** No

**Document Name**

**Comment**



The "aggregate weighted value" concept of Criterion 2.12 is acceptable. However, Criterion 2.12 uses the phrase, "used to perform the reliability tasks of a Transmission Operator in real-time to monitor and control BES Transmission Lines" while Criterion 1.3 uses the different phrase, "used to perform the functional obligations of the Transmission Operator." The two criteria should use the same language in order to prevent gaps in applicability between the two criteria.

Likes 0

Dislikes 0

### Response

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

**Answer**

No

**Document Name**

**Comment**

As previously submitted, Texas RE is concerned the proposed modifications could lead to Transmission Owners (TO) performing functional obligations of Transmission Operators (TOP) or just TOP that currently have medium impact BES Cyber Systems because of 2.12; to become low impact.

- TO's performing functional obligations of TOP's and TOP Control Centers operating BES Transmission Lines less than 200 kV will go from having medium impact BES Cyber Systems to low impact BES Cyber Systems if the BES Transmission Lines do not have an "aggregate weighted value" exceeding 6000 according to the table in 2.12.
- Texas RE is concerned this will have a negative impact on reliability since less BES assets and BES Cyber Systems would be protected under the proposed revisions and become low impact.
  - There are no baselining, vulnerability assessment, ports and services, security patching, malicious code prevention, etc... Requirements for assets that contain low impact BES Cyber Systems.

Likes 0

Dislikes 0

### Response

**Marc Donaldson - Tacoma Public Utilities (Tacoma, WA) - 3**

**Answer**

No

**Document Name**

**Comment**

Similar to Criteria 2.5, Criteria 2.12 should only count lines connected to substations by three or more BES transmission lines. As written, the criteria overestimates the impact of small distribution substations that have a transmission line looped through the substation rather than just tapping the transmission line. As an example, consider a 115 kV transmission line connecting two major substations. Connected to this transmission line are five small unit substations serving load. Under the SDT proposal, if local distribution substations are tapped off of the line, the total weighted value would be

250. If the line is looped through each distribution substation, the line would instead have a weighted value of 1500. The looped through line typically has much better reliability, so weighting it six times worse seems inconsistent with improved reliability.

A previous Considerations of Comments stated that the value of 6000 was based on NERC's document "Integrated Risk Assessment Approach – Refinement to Severity Risk Index. [https://www.nerc.com/docs/pc/rmwg/SRI\\_Equation\\_Refinement\\_May6\\_2011.pdf](https://www.nerc.com/docs/pc/rmwg/SRI_Equation_Refinement_May6_2011.pdf)" However, the SRI does not actually address lines less than 200 kV. The SRI was written in 2011, based on TADS data available at the time. TADS did not include complete reliability information on lines less than 200 kV until 2014. Lines below 200 kV typically configured differently than lines above 200 kV, with lower voltage lines often directly serving load. The SRI equation includes terms for both lost transmission lines and for lost load. Since lower voltage lines are much more likely than higher voltage lines to directly serve load, extrapolating data from higher voltages will incorrectly categorize risk.

Likes 0

Dislikes 0

### Response

#### Spencer Tacke - Modesto Irrigation District - 4

Answer

No

Document Name

Comment

In Section 2.12 , the phrase "...BES Transmission Lines with a..." should be revised to "...BES Transmission Lines and any other transmission lines operated at 60 kV and above with a...".

Likes 0

Dislikes 0

### Response

#### Marty Hostler - Northern California Power Agency - 5

Answer

No

Document Name

Comment

I don't believe the standard was unclear before. I believe NERC, FERC, and Regional Entities were over reaching and should have been more reasonable and less overreaching. For instance:

New IRC 2.12 does not need to say **BES** Transmission lines or **Monitored and Controlled**. CIP-002-5.1a Page 2 Applicability Section 4.2.2 already says "All BES Facilities" it does not say non-BES facilities! Further, the GTB (CIP-002-5.1a GTB page 18) already mentions both Control and Monitor have to occur for a generator's or transmission line's capability to be included in an IRC 2.11 or 2.12 evaluation.

I believe this is all being done because FERC incorrectly produced section 3 page 10 of <https://ferc.gov/legal/staff-reports/2017/10-06-17-CIP-audits-report.pdf>. FERC's report says "For example, Criteria 2.11 requires categorization as Medium Impact of all Control Centers or backup Control Centers, not already categorized as High Impact, used to perform the functional obligations of the Generator Operator for an aggregate highest rated net Real Power capability of the preceding 12 calendar months equal to or exceeding 1500 MW in a single Interconnection. To determine whether a generation

Control Center or back-up Control Center meets the 1500 MW threshold, the MW capacity of both BES generation and non-BES generation are considered. During audit fieldwork, staff found that some entities were only considering BES generation in applying Criteria 2.11, and therefore excluding all “non-BES generation” in their calculations. Foot note 9.” Footnote 9 on Page 10 says “CIP-002-5.1a Attachment 1 does not define, or differentiate between, the terms “BES Generation,” and “Non-BES Generation.” Why would a GOP perform functional obligations of a GOP for a non-BES Generator? Non-registered entities that run generation don’t need to! You don’t have a CFR for a non-BES unit! There are no NERC obligations for a non-BES Unit!

In my view FERC’s footnote 9 is misleading: CIP-002-5.1a GTB page 17 clearly says: While the NERC Glossary term “Facilities” already includes the BES characteristic, the additional use of the term BES here is meant to reinforce the scope of applicability of these Facilities where it is used, especially in this **applicability scoping section**. This in effect sets the scope of Facilities, systems, and equipment that is subject to the standards. This section is especially significant in CIP-002-5.1a and **represents the total scope of Facilities, systems, and equipment to which the criteria in Attachment 1 apply. The IRCs are all in Attachment 1**, thus only BES Generator and Lines are to be considered for IRC 2.11 and 2.12!). Consequently, there is no need to consider non-BES generation since Items in Attachment 1 pertain to BES Facilities only.

Additionally, FERC and NERC still have not answered my questions raised during drafting team phone/webinar meetings "What Generator or Transmission Operator Services does a GOP/TOP provide a non-BES generator/transmission line/substation?"

Why would a GOP/TOP provide said unnecessary services when entities that are not NERC registered who own and run generators and transmission lines don't need to provide GOP/TOP services to the very same/similar non-BES assets?

It is unfair to require GOP/TOPs to incur extra NERC Compliance costs for their Control Centers due to non-BES assets capability inclusion. NERC rules clear state "A reliability standard shall not give any market participant an unfair competitive advantage". Making GOPs/TOPs pay Control Center compliance costs for non-BES assets they operate is unfair as non-GOPs that own and run the same/similar units do not have to pay extra NERC cost for non-BES assets' they control and monitor from a central location(s).

It ironic that NERC recently had another Project recently up for Ballot “Moving Technical Rational Sections” out of standards. Why? NERC/FERC are already ignoring the GTB and the applicability sections too? Waste of money and more confusion; have to reference several documents to comply with a single standard.

Likes	0
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Dislikes	0
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**Response**

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

<b>Answer</b>	Yes
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<b>Document Name</b>	
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**Comment**

None

Likes	0
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Dislikes	0
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**Response**

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

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
We agree with the drafting team, but we believe that Criterion 2.12 should be expanded to include any Control Center that operates a Medium Impact substation should be considered Medium Impact BES Cyber System (BCS).	
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 agrees with and supports the proposed modification in CIP-002-6 Attachment 1, Criterion 2.12.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Westar Energy and Kansas City Power & Light support Edison Electric Institute's response.	
Likes 0	
Dislikes 0	
<b>Response</b>	

<b>Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Southern Company agrees with the proposed modification and appreciates the establishment of a bright line criteria between Low and Medium Impact Control Centers. The proposed change provides Registered Entities clarity which will help ensure that they have properly and consistently classified their BES facilities and assets.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Masuncha Bussey - Duke Energy - 1,3,5,6 - SERC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Duke Energy generally agrees with the proposed modifications in CIP-002-6 Attachment 1, Criterion 2.12.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Michael Johnson - Michael Johnson On Behalf of: Marco Rios, Pacific Gas and Electric Company, 1, 3, 5; - Michael Johnson</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
None	
Likes 0	
Dislikes 0	
<b>Response</b>	

**Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable****Answer** Yes**Document Name****Comment**

EEI agrees with and supports the proposed modification in CIP-002-6 Attachment 1, Criterion 2.12.

Likes 0

Dislikes 0

**Response****Clay Walker - Cleco Corporation - 1,3,5,6 - SERC****Answer** Yes**Document Name****Comment**

See EEI comments.

Likes 0

Dislikes 0

**Response****Terry Volkmann - Glencoe Light and Power Commission - 1****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Chinedu Ochonogor - APS - Arizona Public Service Co. - 6****Answer** Yes**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response****Kjersti Drott - Tri-State G and T Association, Inc. - 1****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****LaTroy Brumfield - American Transmission Company, LLC - 1****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Laura Nelson - IDACORP - Idaho Power Company - 1****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response**

**Jeff Ipsaro - Silicon Valley Power - City of Santa Clara - 4**

**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**

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

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Val Ridad - Silicon Valley Power - City of Santa Clara - 3**

**Answer** Yes

**Document Name**

**Comment**



Likes 0

Dislikes 0

**Response**

**Andrea Barclay - Georgia System Operations Corporation - 4**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Tho Tran - Tho Tran On Behalf of: Lee Maurer, Oncor Electric Delivery, 1; - Tho Tran**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Darnez Gresham - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Kent Feliks - AEP - 3****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Bruce Reimer - Manitoba Hydro - 1****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Stacy Lee - City of College Station - 1****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

**Response**

**Tim Womack - Puget Sound Energy, Inc. - 3**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Leonard Kula - Independent Electricity System Operator - 2**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Barry Lawson - National Rural Electric Cooperative Association - 4**

Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Jeanne Kurzynowski - CMS Energy - Consumers Energy Company - 1,3,4,5 - RF</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Kagen DelRio - Kagen DelRio On Behalf of: doug white, North Carolina Electric Membership Corporation, 3, 4, 5; John Cook, North Carolina Electric Membership Corporation, 3, 4, 5; Luis Fondacci, North Carolina Electric Membership Corporation, 3, 4, 5; - Kagen DelRio</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Bobbi Welch - Bobbi Welch On Behalf of: David Zwergel, Midcontinent ISO, Inc., 2; - Bobbi Welch</b>	
Answer	Yes
Document Name	
<b>Comment</b>	

Likes 0

Dislikes 0

**Response**

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

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**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**

**Karl Blaszkowski - CMS Energy - Consumers Energy Company - 3**

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Jesus Sammy Alcaraz - Imperial Irrigation District - 1,3,5,6</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Lana Smith - San Miguel Electric Cooperative, Inc. - 5</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

**Response**

**Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Alan Johnson - NRG - NRG Energy, Inc. - 5,6 - MRO,WECC,Texas RE,NPCC,SERC,RF**

**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**

**Kevin Salsbury - Berkshire Hathaway - NV Energy - 5**

**Answer**

Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Pam Feuerstein - Intermountain REA - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Carl Pineault - Hydro-Qu?bec Production - 1,5</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
N/A	
Likes 0	
Dislikes 0	
<b>Response</b>	



2. Based on comments received from industry, the SDT reverted the Planned and Unplanned Changes section back to current state by removing it from the Effective Date section of CIP-002-6 and moving the existing language from the CIP-002-5.1a Implementation Plan into the CIP-002-6 Implementation Plan (with only updates to version information). Do you agree with the proposed modification? If no, please provide your rationale and an alternate proposal.

**Marty Hostler - Northern California Power Agency - 5**

**Answer** No

**Document Name**

**Comment**

Planned an unplanned language was never in the SAR and never should have been debated. And never should be. NERC/FERC was trying to take a GOP emphirical operations based data IRC 2.11 and change it to an unproven theoritically based criteria (Planned Changes). Totally unreasonable over regulation attempts.

Please I praise the STD for reverting back to the old implementation plan. But it was changed a little bit or word order changes. Why couldn't language be really reverted back to current state" ?

Likes 0

Dislikes 0

**Response**

**Lana Smith - San Miguel Electric Cooperative, Inc. - 5**

**Answer** No

**Document Name**

**Comment**

San Miguel agrees with comments submitted by NRECA.

Likes 0

Dislikes 0

**Response**

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

**Answer** No

**Document Name**

**Comment**

AECI supports comments filed by NRECA as such:

NRECA has identified a potential gap in the language intended to address initial performance of periodic requirements. The language in the “Planned Changes” section of the implementation plan refers to all CIP Reliability Standards. However, the current language in the “Initial Performance of Periodic Requirements” section appears to address only CIP-002-6 and does not address periodic requirements contained in CIP-003-CIP-011. Accordingly, responsible entity obligations relative to periodic requirements contained in CIP-003-CIP-011 are unclear. To facilitate a clear understanding of responsible entity obligations relative to other periodic requirements, NRECA recommends that the “Initial Performance of Periodic Requirements” section be revised to state:

*“After a cyber asset has been categorized under CIP-002-6, Requirement R1, responsible entities shall initially comply with any applicable periodic requirements in CIP Reliability Standards in accordance with the periodicity specified in the applicable requirement.”*

Additionally, NRECA believes further clarification and guidance is needed to ensure consistent application of “Planned” and “Unplanned” changes, especially as it relates to who made the change(s) and if this impacted any adjacent or other facilities not included in the direct scope of the planned project. NRECA recommends that the SDT examine how this can be clarified in the standard, Supplemental Material, or Guidelines and Technical Basis.

Likes 0

Dislikes 0

### Response

**Kagen DelRio - Kagen DelRio On Behalf of: doug white, North Carolina Electric Membership Corporation, 3, 4, 5; John Cook, North Carolina Electric Membership Corporation, 3, 4, 5; Luis Fondacci, North Carolina Electric Membership Corporation, 3, 4, 5; - Kagen DelRio**

Answer

No

Document Name

Comment

NCEMC supports NRECA's Comments

Likes 0

Dislikes 0

### Response

**Barry Lawson - National Rural Electric Cooperative Association - 4**

Answer

No

Document Name

Comment

NRECA has identified a potential gap in the language intended to address initial performance of periodic requirements. The language in the “Planned Changes” section of the implementation plan refers to all CIP Reliability Standards. However, the current language in the “Initial Performance of Periodic Requirements” section appears to address only CIP-002-6 and does not address periodic requirements contained in CIP-003-CIP-011.

Accordingly, responsible entity obligations relative to periodic requirements contained in CIP-003-CIP-011 are unclear. To facilitate a clear understanding of responsible entity obligations relative to other periodic requirements, NRECA recommends that the “Initial Performance of Periodic Requirements” section be revised to state:

*“After a cyber asset has been categorized under CIP-002-6, Requirement R1, responsible entities shall initially comply with any applicable periodic requirements in CIP Reliability Standards in accordance with the periodicity specified in the applicable requirement.”*

Additionally, NRECA believes further clarification and guidance is needed to ensure consistent application of “Planned” and “Unplanned” changes, especially as it relates to who made the change(s) and if this impacted any adjacent or other facilities not included in the direct scope of the planned project. NRECA recommends that the SDT examine how this can be clarified in the standard, Supplemental Material, or Guidelines and Technical Basis.

Likes 0

Dislikes 0

### Response

#### Andrea Barclay - Georgia System Operations Corporation - 4

Answer

No

Document Name

### Comment

GSOC has identified a potential gap in the language intended to address initial performance of periodic requirements. The language in the planned changes section of the implementation plan refers to all CIP Reliability Standards. However, the current language in the initial performance of certain periodic requirements appears to address only CIP-002-6 and does not address periodic requirements contained in CIP-003-CIP-011. Accordingly, responsible entity obligations relative to periodic requirements contained in CIP-003-CIP-011 are unclear. To facilitate a clear understanding of responsible entity obligations relative to other periodic requirements, GSOC recommends that the initial performance of certain periodic requirements be revised to state:

After a cyber asset has been categorized under CIP-002-6, Requirement R1, responsible entities shall initially comply with any applicable periodic requirements in CIP Reliability Standards in accordance with the periodicity specified in the applicable requirement.

Likes 0

Dislikes 0

### Response

#### Kevin Salsbury - Berkshire Hathaway - NV Energy - 5

Answer

Yes

Document Name

### Comment

We understand future revisions CIP-002 are currently being planned to address this, but would like to offer our comments pertaining to the subject as addressed in this revision. We prefer the draft version CIP-002-6 from 06/03/2019 where the proposed planned and unplanned language was made

into subsections of the Effective Dates section. We feel that making this change gave entities a stronger legal basis for determining compliance due dates and operational definitions for newly identified BES Cyber Systems when planned or unplanned changes occur. The examples in the planned changes section contradict what the definition paragraph states for planned changes -

“Planned changes refer to any changes of the electric system or BES Cyber System which were planned and implemented by the responsible entity **and** subsequently identified through the annual assessment under CIP-002-6, Requirement R2.”

The “and” in the statement above seems to remove the requirement to have the BES Cyber System complaint prior to the date that the system can impact the Bulk Electric System. This would imply that there is a task to assess the new BES Cyber System’s compliance to the CIP standards before the required 15 month R2 review. This seems to create risk to the BES, considering that the BES Cyber System could be in operation for a period of time where it may or may not have all of the CIP controls applied to it.

Likes 0

Dislikes 0

### Response

#### Clay Walker - Cleco Corporation - 1,3,5,6 - SERC

Answer

Yes

Document Name

Comment

See EEI comments.

Likes 0

Dislikes 0

### Response

#### Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6

Answer

Yes

Document Name

Comment

: We understand future revisions CIP-002 are currently being planned to address this, but would like to offer our comments pertaining to the subject as addressed in this revision. We prefer the draft version CIP-002-6 from 06/03/2019 where the proposed planned and unplanned language was made into subsections of the Effective Dates section. We feel that making this change gave entities a stronger legal basis for determining compliance due dates and operational definitions for newly identified BES Cyber Systems when planned or unplanned changes occur. The proposed language for planned and unplanned changes in the current implementation planned removed the rigor to ensure that BES Cyber Systems that can impact the Bulk Electric System are compliant to the CIP Standards within the timeframes specified for planned or unplanned changes. The examples in the planned changes section contradict what the definition paragraph states for planned changes -

“Planned changes refer to any changes of the electric system or BES Cyber System which were planned and implemented by the responsible entity and subsequently identified through the annual assessment under CIP-002-6, Requirement R2.”

The “and” in the statement above seems to remove the requirement to have the BES Cyber System complaint prior to the date that the system can impact the Bulk Electric System. This would imply that there is a task to assess the new BES Cyber System’s compliance to the CIP standards before the required 15 month R2 review. This seems to create risk to the BES, considering that the BES Cyber System could be in operation for a period of time where it may or may not have all of the CIP controls applied to it.

Likes 0

Dislikes 0

### Response

**Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable**

**Answer** Yes

**Document Name**

### Comment

EEl supports the proposed modification.

Likes 0

Dislikes 0

### Response

**Michael Johnson - Michael Johnson On Behalf of: Marco Rios, Pacific Gas and Electric Company, 1, 3, 5; - Michael Johnson**

**Answer** Yes

**Document Name**

### Comment

PG&E appreciates the SDT reverting the Planned and Unplanned Changes back to the original CIP-005-5 conditions until an appropriate SAR can be proposed to address the conditions raised in the July 2019 CIP-002-6 comment and ballot.

Likes 0

Dislikes 0

### Response

**Masunchu Bussey - Duke Energy - 1,3,5,6 - SERC**

**Answer** Yes

**Document Name**

**Comment**

Duke Energy generally agrees with the proposed modifications. However, the speed in which solar sites are being built does not allow sufficient time to build physical security controls without delaying solar connection to the grid. Duke would like to see an implementation plan for newly build generation which allows the registered entity a specified amount of time (6 months) to complete compliance tasks and documentation.

Duke Energy would like the unplanned change definition to include purchases of new generation as well. The registered entity knows the purchase is taking place, but the plant will need to be included in the Duke program after the purchase date.

Likes 0

Dislikes 0

**Response**

**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company**

**Answer**

Yes

**Document Name**

**Comment**

Southern agrees with reverting this wording back to the "current state". Moving this proposed change to a separate SAR will give the SDT and the industry much needed time to fully explore additional options and appropriately weigh any compliance risk associated with the change.

Likes 0

Dislikes 0

**Response**

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

**Answer**

Yes

**Document Name**

**Comment**

We agree with the change, however it should be clear that the implementation schedule is applicable to any of the unplanned change type listed on the table of CIP-002-6 on page 3 and is enforceable going forward, not just during transition from CIP-002-5.1a to CIP-002-6.

Likes 0

Dislikes 0

**Response**

**Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 1,**

3, 6, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL

Answer Yes

Document Name

Comment

Westar Energy and Kansas City Power & Light support Edison Electric Institute's response.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

Exelon supports the proposed modification.

Likes 0

Dislikes 0

Response

Darnez Gresham - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3

Answer Yes

Document Name

Comment

The existing language from the CIP-002-5.1a Implementation Plan moved into the CIP-002-6 Implementation Plan provides shorter implementation periods than the Planned and Unplanned Changes section stricken from CIP-002-6 Draft 3. Specifically, Draft 3 provided 24 calendar months for unplanned changes resulting in new BES Cyber Systems or a higher categorization for existing BES Cyber Systems, whereas the new Implementation Plan only provides 12 months. The wording of Question 2 does not make that clear. Request industry be advised of this impact.

Likes 0

Dislikes 0

Response

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

**Answer** Yes

**Document Name**

**Comment**

Ameren supports EEI comments for this question; therefore we support the proposed modification.

Likes 0

Dislikes 0

**Response**

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

**Answer** Yes

**Document Name**

**Comment**

Reclamation supports the concept of different compliance implementation dates for planned versus unplanned changes. Reclamation recommends the compliance implementation date be calculated from the date the modified BES Cyber System is capable of impacting the BES. This will allow time for testing and returning existing equipment to service without the need to document compliance of equipment that is not capable of causing an adverse reliability impact.

Likes 0

Dislikes 0

**Response**

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**



**Pam Feuerstein - Intermountain REA - 3**

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

**Alan Johnson - NRG - NRG Energy, Inc. - 5,6 - MRO,WECC,Texas RE,NPCC,SERC,RF**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

**Response**

**Marc Donaldson - Tacoma Public Utilities (Tacoma, WA) - 3**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jesus Sammy Alcaraz - Imperial Irrigation District - 1,3,5,6**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Karl Blaszkowski - CMS Energy - Consumers Energy Company - 3**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer** Yes

**Document Name**

**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 RSC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Bobbi Welch - Bobbi Welch On Behalf of: David Zwergel, Midcontinent ISO, Inc., 2; - Bobbi Welch**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jeanne Kurzynowski - CMS Energy - Consumers Energy Company - 1,3,4,5 - RF**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Leonard Kula - Independent Electricity System Operator - 2**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Carl Pineault - Hydro-Quebec Production - 1,5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Tim Womack - Puget Sound Energy, Inc. - 3**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Bruce Reimer - Manitoba Hydro - 1</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Kent Feliks - AEP - 3</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Anthony Jablonski - ReliabilityFirst - 10</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

**Response**

**Tho Tran - Tho Tran On Behalf of: Lee Maurer, Oncor Electric Delivery, 1; - Tho Tran**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Val Ridad - Silicon Valley Power - City of Santa Clara - 3**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer**

Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Jeff Ipsaro - Silicon Valley Power - City of Santa Clara - 4</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Laura Nelson - IDACORP - Idaho Power Company - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>LaTroy Brumfield - American Transmission Company, LLC - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

**Response**

**Kjersti Drott - Tri-State G and T Association, Inc. - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Chinedu Ochonogor - APS - Arizona Public Service Co. - 6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Terry Volkmann - Glencoe Light and Power Commission - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1,3,5,6**

**Answer** Yes

**Document Name**



**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer**

**Document Name**

**Comment**

Texas RE recommends including additional examples under Planned Changes to include Generation Facilities and Control Centers. Responsible Entities have struggled with the interpretation of what “*upon the commissioning*” means.

Texas RE noticed the following:

- “Responsible Entities” is capitalized throughout the Standard but not in the Implementation Plan. Texas RE recommends the term be capitalized and the language explaining “Responsible Entities” added for clarity and consistency.
- In the table for “unplanned changes” the term “Medium-Impact” is capitalized/hyphenated and should not be for consistency.

Likes 0

Dislikes 0

**Response**

3. The SDT believes proposed modifications in CIP-002-6 provide entities with flexibility to meet the reliability objectives in a cost effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

**James Baldwin - Eugene Water and Electric Board - 1,3 - WECC**

**Answer** No

**Document Name**

**Comment**

Instead of the SDT pulling more entities into the Medium Impact Category, EWEB suggests that the CIP Low requirements be enhanced to establish greater Critical Infrastructure Protection. The difference between the CIP Low and CIP Medium Requirements is drastic, closing this gap would enhance security without over-burdening smaller entities that pose little to no threat to the BES.

Likes 0

Dislikes 0

**Response**

**Daniel Gacek - Exelon - 1**

**Answer** Yes

**Document Name**

**Comment**

Exelon supports the proposed modification in terms of the flexibility it provides to meet reliability objectives in a cost effective manner..

Likes 0

Dislikes 0

**Response**

**Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL**

**Answer** Yes

**Document Name**

**Comment**

Westar Energy and Kansas City Power & Light support Edison Electric Institute's response.

Likes 0

Dislikes 0

**Response**

**Masuncha Bussey - Duke Energy - 1,3,5,6 - SERC**

**Answer**

Yes

**Document Name**

**Comment**

Duke Energy generally does not agree that the proposed modifications in CIP-002-6 are cost effective. Duke Energy generally does not agree that they pose a financial burden.

Likes 0

Dislikes 0

**Response**

**Michael Johnson - Michael Johnson On Behalf of: Marco Rios, Pacific Gas and Electric Company, 1, 3, 5; - Michael Johnson**

**Answer**

Yes

**Document Name**

**Comment**

As provided in PG&E comments as part of the July 2019 comment and ballot period, PG&E believes the 24 month time-frame is sufficient to apply the necessary Requirement changes when the impact rating goes from low to medium, or medium to high. While PG&E has not experienced changes in impact rating that would elevate a BCS impact rating, our experience on the application of the Requirements for medium and high BCS does not suggest a longer time-frame would be necessary.

Likes 0

Dislikes 0

**Response**

**Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6**

**Answer**

Yes

**Document Name**

**Comment**

none

Likes 0

Dislikes 0

**Response**

**Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1,3,5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Terry Volkmann - Glencoe Light and Power Commission - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Chinedu Ochonogor - APS - Arizona Public Service Co. - 6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Kjersti Drott - Tri-State G and T Association, Inc. - 1**

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>LaTroy Brumfield - American Transmission Company, LLC - 1</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Laura Nelson - IDACORP - Idaho Power Company - 1</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Jeff Ipsaro - Silicon Valley Power - City of Santa Clara - 4</b>	
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**

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

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Val Ridad - Silicon Valley Power - City of Santa Clara - 3**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC**

**Answer**

Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Tho Tran - Tho Tran On Behalf of: Lee Maurer, Oncor Electric Delivery, 1; - Tho Tran</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Anthony Jablonski - ReliabilityFirst - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Darnez Gresham - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

**Response**

**Kent Feliks - AEP - 3**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Bruce Reimer - Manitoba Hydro - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Tim Womack - Puget Sound Energy, Inc. - 3**

**Answer** Yes

**Document Name**



**Comment**

Likes 0

Dislikes 0

**Response**

**Carl Pineault - Hydro-Qu?bec Production - 1,5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jeanne Kurzynowski - CMS Energy - Consumers Energy Company - 1,3,4,5 - RF**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Karl Blaszkowski - CMS Energy - Consumers Energy Company - 3**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Jesus Sammy Alcaraz - Imperial Irrigation District - 1,3,5,6**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

**Response**

**Marc Donaldson - Tacoma Public Utilities (Tacoma, WA) - 3**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Lana Smith - San Miguel Electric Cooperative, Inc. - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Alan Johnson - NRG - NRG Energy, Inc. - 5,6 - MRO,WECC,Texas RE,NPCC,SERC,RF**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Kevin Salsbury - Berkshire Hathaway - NV Energy - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Pam Feuerstein - Intermountain REA - 3**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer**

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

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

**Answer**

**Document Name**

**Comment**

Ameren supports EEI comments for this question; therefore we will not submit comments on cost effectiveness of the proposed changes.

Likes 0

Dislikes 0

**Response**

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

**Answer**

**Document Name**

**Comment**

Texas RE does not have comments on this question.

Likes 0

Dislikes 0

**Response**

**Clay Walker - Cleco Corporation - 1,3,5,6 - SERC**

**Answer**

**Document Name**

**Comment**

See EEI comments.

Likes 0

Dislikes 0

**Response**

**Marty Hostler - Northern California Power Agency - 5**

**Answer**

**Document Name**

**Comment**

No NERC needs to include real cost estimate. Take a look at a recent WECC Controls webinar and include those cost too in all standards.

Likes 0

Dislikes 0

**Response**

4. If you have additional comments on the proposed CIP-002-6 that you have not provided in response to the questions above, please provide them here.

Marty Hostler - Northern California Power Agency - 5

Answer

Document Name

Comment

New IRC 2.12 does not need to say **BES** Transmission lines or **Monitored and Controlled**. CIP-002-5.1a Page 2 Applicability Section 4.2.2 already says "All BES Facilities" it does not say non-BES facilities! Further, the GTB (CIP-002-5.1a GTB page 18) already mentions both Control and Monitor have to occur for a generator's or transmission line's capability to be included in an IRC 2.11 or 2.12 evaluation.

I believe this is all being done because FERC incorrectly produced section 3 page 10 of <https://ferc.gov/legal/staff-reports/2017/10-06-17-CIP-audits-report.pdf>. FERC's report says "For example, Criteria 2.11 requires categorization as Medium Impact of all Control Centers or backup Control Centers, not already categorized as High Impact, used to perform the functional obligations of the Generator Operator for an aggregate highest rated net Real Power capability of the preceding 12 calendar months equal to or exceeding 1500 MW in a single Interconnection. To determine whether a generation Control Center or back-up Control Center meets the 1500 MW threshold, the MW capacity of both BES generation and non-BES generation are considered. During audit fieldwork, staff found that some entities were only considering BES generation in applying Criteria 2.11, and therefore excluding all "non-BES generation" in their calculations. Footnote 9." Footnote 9 on Page 10 says "CIP-002-5.1a Attachment 1 does not define, or differentiate between, the terms "BES Generation," and "Non-BES Generation." Why would a GOP perform functional obligations of a GOP for a non-BES Generator? Non-registered entities that run generation don't need to! You don't have a CFR for a non-BES unit! There are no NERC obligations for a non-BES Unit!

In my view FERC's footnote 9 is misleading: CIP-002-5.1a GTB page 17 clearly says: While the NERC Glossary term "Facilities" already includes the BES characteristic, the additional use of the term BES here is meant to reinforce the scope of applicability of these Facilities where it is used, especially in this **applicability scoping section**. This in effect sets the scope of Facilities, systems, and equipment that is subject to the standards. This section is especially significant in CIP-002-5.1a and **represents the total scope of Facilities, systems, and equipment to which the criteria in Attachment 1 apply. The IRCs are all in Attachment 1**, thus only BES Generator and Lines are to be considered for IRC 2.11 and 2.12!). Consequently, there is no need to consider non-BES generation since Items in Attachment 1 pertain to BES Facilities only.

Additionally, FERC and NERC still have not answered my questions raised during drafting team phone/webinar meetings "What Generator or Transmission Operator Services does a GOP/TOP provide a non-BES generator/transmission line/substation?"

Why would a GOP/TOP provide said unnecessary services when entities that are not NERC registered who own and run generators and transmission lines don't need to provide GOP/TOP services to the very same/similar non-BES assets?

It is unfair to require GOP/TOPs to incur extra NERC Compliance costs for their Control Centers due to non-BES assets capability inclusion. NERC rules clear state "A reliability standard shall not give any market participant an unfair competitive advantage". Making GOPs/TOPs pay Control Center compliance costs for non-BES assets they operate is unfair as non-GOPs that own and run the same/similar units do not have to pay extra NERC cost for non-BES assets' they control and monitor from a central location(s).

It ironic that NERC recently had another Project recently up for Ballot "Moving Technical Rational Sections" out of standards. Why? NERC/FERC are already ignoring the GTB and the applicability sections too? Waste of money and more confusion; have to reference several documents to comply with a single standard.

Likes 0

Dislikes 0

Response

**Kevin Salsbury - Berkshire Hathaway - NV Energy - 5**

**Answer**

**Document Name**

**Comment**

NV Energy believes additional guidance is necessary regarding Planned and Unplanned Changes with respect to acquisition of new BES assets from another Entity.

Would any BES Cyber Systems compliance issues discovered after acquisition of the Assets already commissioned by the selling Entity be subject to immediate compliance with CIP Cyber Security Standards, or would this discovery by the purchasing Entity constitute an Unplanned Change with 12 months to achieve compliance?

Likes 0

Dislikes 0

**Response**

**Clay Walker - Cleco Corporation - 1,3,5,6 - SERC**

**Answer**

**Document Name**

**Comment**

EEI offers for SDT consideration the following additional comments on Draft 4 of CIP-002-6:

1. Page 5 of the Redline, EEI suggests that all references to Version 4 and 5 should be removed from the Standard. We are now on Version 6 and the following language should be removed from the standard - "transitioning from Version 4 to Version 5" and "(as that term is used in Version 4)".
2. Page 6 and page 28 of the Redline: EEI suggests removing all references to the NERC Functional Model. (See Reliable Operation of the BES/P6 and High Impact Rating/P28). NERC has decided to no longer maintain the Functional Model, therefore it should not be referenced in Reliability Standards. Instead, the SDT should make references to the appropriate sections of NERC's Organization Registration and Certification Manual and the Compliance Registry Criteria, per the determination made by the Standards Committee at their October 2019 meeting.
3. Page 7 of the Redline: Remove the bulleted examples for EACMS, PACS and PCA given all three are defined terms in NERC's Glossary of Terms and the definition for EACMS and PACs were both adopted by the NERC BOT on 12/26/2012 and approved by FERC on 11/22/2013, while PCA was adopted by the NERC BOT on 2/12/2015 and approved by FERC on 1/21/2016.
4. The footnote on all pages (i.e., page 10 moving forward) incorrectly still reference Draft 3 of CIP-002-6.
5. Page 17 of the Redline: Remove the second listing of the title (Impact Rating Criteria) at the top of Attachment 1.



6. Page 22 of the Redline: EEI supports the SDT decision to not remove the Guidelines and Technical Basis at this time, in order to ensure changes made to CIP-002-6 are not needlessly delayed. However, we do ask that the GTB be removed within Project 2016-02 before the current SDT is disbanded.

Likes 0

Dislikes 0

**Response**

**Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6**

**Answer**

**Document Name**

**Comment**

We request additional guidance regarding Planned and Unplanned Changes with respect to acquisition of new BES assets from another Entity.

Would any BES Cyber Systems compliance issues discovered after acquisition of the Assets already commissioned by the selling Entity be subject to immediate compliance with CIP Cyber Security Standards, or would this discovery by the purchasing Entity constitute an Unplanned Change with 12 months to achieve compliance?

Likes 0

Dislikes 0

**Response**

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

**Answer**

**Document Name**

**Comment**

We thank the SDT for allowing us to provide comments on these changes.

Likes 0

Dislikes 0

**Response**

**Lana Smith - San Miguel Electric Cooperative, Inc. - 5**

**Answer**

**Document Name**

**Comment**

San Miguel appreciates the efforts of the SDT on this project.

Likes 0

Dislikes 0

**Response**

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

**Answer**

**Document Name**

**Comment**

AECI appreciates the efforts of the SDT on these issues.

Likes 0

Dislikes 0

**Response**

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

**Answer**

**Document Name**

**Comment**

Texas RE noticed the following:

- In the section “BES Cyber Systems”, there appears to be incorrect grammar in first sentence discussing transition.
- Starting on page 10, the footer information contains the incorrect draft version and date.

Likes 0

Dislikes 0

**Response**

**Bobbi Welch - Bobbi Welch On Behalf of: David Zwergel, Midcontinent ISO, Inc., 2; - Bobbi Welch**

**Answer**

**Document Name**

**Comment**

MISO supports the additional clarity provided in the Supplemental Material (on page 29, under "Medium Impact Rating" and page 38 under "Low Impact Rating"); i.e. "No additional evaluation is necessary for BES Cyber Systems that have already been identified as high (or medium) impact."

Likes 0

Dislikes 0

**Response**

**Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable**

**Answer**

**Document Name**

**Comment**

Comments: EEI offers for SDT consideration the following additional comments on Draft 4 of CIP-002-6:

1. Page 5 of the Redline, Section 6, Background, under subheading "BES Cyber Systems", the first word in the sentence (transitioning) needs to be capitalized.
2. Page 5 of the Redline, EEI suggests that all references to Version 4 and 5 should be removed from the Standard. We are now on Version 6 and the following language should be removed from the standard - "transitioning from Version 4 to Version 5" and "(as that term is used in Version 4)".
3. Page 6 and page 28 of the Redline: EEI suggests removing all references to the NERC Functional Model. (See Reliable Operation of the BES/P6 and High Impact Rating/P28). NERC has decided to no longer maintain the Functional Model, therefore it should not be referenced in Reliability Standards. Instead, the SDT should make references to the appropriate sections of NERC's Organization Registration and Certification Manual and the Compliance Registry Criteria, per the determination made by the Standards Committee at their October 2019 meeting.
4. Page 7 of the Redline: Remove the bulleted examples for EACMS, PACS and PCA given all three are defined terms in NERC's Glossary of Terms and the definition for EACMS and PACs were both adopted by the NERC BOT on 12/26/2012 and approved by FERC on 11/22/2013, while PCA was adopted by the NERC BOT on 2/12/2015 and approved by FERC on 1/21/2016.
5. The footnote on all pages (i.e., page 10 moving forward) incorrectly still references Draft 3 of CIP-002-6.
6. Page 17 of the Redline: Remove the second listing of the title (Impact Rating Criteria) at the top of Attachment 1.
7. Page 22 of the Redline: EEI supports the SDT decision to not remove the Guidelines and Technical Basis at this time, in order to ensure changes made to CIP-002-6 are not needlessly delayed. However, we do ask that the GTB be removed within Project 2016-02 before the current SDT is disbanded.

Likes 0

Dislikes 0

**Response**

**Kagen DelRio - Kagen DelRio On Behalf of: doug white, North Carolina Electric Membership Corporation, 3, 4, 5; John Cook, North Carolina Electric Membership Corporation, 3, 4, 5; Luis Fondacci, North Carolina Electric Membership Corporation, 3, 4, 5; - Kagen DelRio**

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
NCEMC appreciates the efforts of the SDT on these issues.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Michael Johnson - Michael Johnson On Behalf of: Marco Rios, Pacific Gas and Electric Company, 1, 3, 5; - Michael Johnson</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
PG&E provides no additional comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Masuncha Bussey - Duke Energy - 1,3,5,6 - SERC</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Duke Energy has the following additional comments - The second paragraph in Criterion 2.1 on page 29 of 45 states "to use a value that could be verified through existing requirements as proposed by NERC standard MOD-024" The MOD-024 Standard has been retired and should be removed as a reference.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Barry Lawson - National Rural Electric Cooperative Association - 4</b>	
<b>Answer</b>	

<b>Document Name</b>	
<b>Comment</b>	
NRECA appreciates the efforts of the SDT on these issues.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
While draft 3 provided additional time (24 calendar months) for unplanned changes resulting in new BES Cyber Systems or a higher categorization for existing BES Cyber Systems, Southern understands that removing the proposed change associated with “time frames to implement” while reverting to the previous language makes sense. We look forward to the opportunity to actively participate in addressing this as a part of a future proposed change which encompasses addressing planned and unplanned changes, as a whole.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Provide clearer examples for each of the listed items in the implementation table for the unplanned section.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Carl Pineault - Hydro-Quebec Production - 1,5</b>	
<b>Answer</b>	

<b>Document Name</b>	
<b>Comment</b>	
N/A	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Daniel Gacek - Exelon - 1</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>Exelon supports the comments offered by EEI, as reflected here:</p> <ol style="list-style-type: none"> <li>Page 5 of the Redline, EEI suggests that all references to Version 4 and 5 should be removed from the Standard. We are now on Version 6 and the following language should be removed from the standard - "transitioning from Version 4 to Version 5" and "(as that term is used in Version 4)".</li> <li>Page 6 and page 28 of the Redline: EEI suggests removing all references to the NERC Functional Model. (See Reliable Operation of the BES/P6 and High Impact Rating/P28). NERC has decided to no longer maintain the Functional Model , therefore it should not be referenced in Reliability Standards. Instead, the SDT should make references to the appropriate sections of NERC's Organization Registration and Certification Manual and the Compliance Registry Criteria, per the determination made by the Standards Committee at their October 2019 meeting.</li> <li>Page 7 of the Redline: Remove the bulleted examples for EACMS, PACS and PCA given all three are defined terms in NERC's Glossary of Terms and the definition for EACMS and PACs were both adopted by the NERC BOT on 12/26/2012 and approved by FERC on 11/22/2013, while PCA was adopted by the NERC BOT on 2/12/2015 and approved by FERC on 1/21/2016.</li> <li>The footnote on all pages (i.e., page 10 moving forward) incorrectly still reference Draft 3 of CIP-002-6.</li> <li>Page 17 of the Redline: Remove the second listing of the title (Impact Rating Criteria) at the top of Attachment 1.</li> <li>Page 22 of the Redline: EEI supports the SDT decision to not remove the Guidelines and Technical Basis at this time, in order to ensure changes made to CIP-002-6 are not needlessly delayed. However, we do ask that the GTB be removed within Project 2016-02 before the current SDT is disbanded</li> </ol>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Kent Feliks - AEP - 3</b>	

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
AEP has no additional comments at this time.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Darnez Gresham - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
We request additional guidance regarding Planned and Unplanned Changes with respect to acquisition of new BES assets from another Entity.	
Would any BES Cyber Systems compliance issues discovered after acquisition of the Assets already commissioned by the selling Entity be subject to immediate compliance with CIP Cyber Security Standards, or would this discovery by the purchasing Entity constitute an Unplanned Change with 12 months to achieve compliance?	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Anthony Jablonski - ReliabilityFirst - 10</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
The posted version has incorrect grammar in R1, Parts 1.1 and 1.2. Please change Part 1.1 from "Identify each of the high impact BES Cyber System" to "Identify each high impact BES Cyber System". Please change Part 1.2 from "Identify each of the medium impact BES Cyber System" to "Identify each medium impact BES Cyber System". Also please consider requiring explicit identification of associated systems (currently EACMS, PACS, PCA) for inclusion in the standard language (e.g. R1 P1.4) for high and medium impact BES Cyber Systems. Suggested wording: "Identify each EACMS, PACS, and PCA associated with a high impact BES Cyber System or a medium impact BES Cyber System." This addition would serve to remind Responsible Entities that such identifications are required, and will permit assessing a violation, if applicable, against only one Requirement.	
Likes 0	
Dislikes 0	

**Response**

**Tho Tran - Tho Tran On Behalf of: Lee Maurer, Oncor Electric Delivery, 1; - Tho Tran**

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

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

**Answer**

**Document Name**

**Comment**

Ameren agrees with and supports EEI comments for this question.

Likes 0

Dislikes 0

**Response**

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

**Answer**

**Document Name**

**Comment**

Reclamation recommends the SDT add the definitions of Planned Changes and Unplanned Changes to the NERC Glossary of Terms.

Likes 0

Dislikes 0

**Response**



**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer**

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**LaTroy Brumfield - American Transmission Company, LLC - 1**

**Answer**

**Document Name**

**Comment**

ATC supports the commetns of EEI.

Likes 0

Dislikes 0

**Response**

**Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1,3,5,6**

**Answer**

**Document Name**

**Comment**

I find the standard difficult to read with the various references back and forth between the Standard and Attachment 1. Ideally, the references should be mimized. This may be an issue in enforcement, and could cause some confusion to some entities.

Likes 0

Dislikes 0

**Response**