

Control Center Definition

Consideration of Comments | May 2018

Background

The Project 2016-02 Modifications to Critical Infrastructure Protection (CIP) Standard Drafting Team (SDT) thanks all commenters who submitted comments on the draft Control Center definition. This definition was posted for a 45-day public comment period through Friday, April 30, 2018. Stakeholders were asked to provide feedback on the definition and implementation document through a special electronic comment form. There were 74 sets of responses, including comments from approximately 177 different people from approximately 127 companies representing the 10 Industry Segments as shown in the table on the following pages.

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

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Standards Developer [Jordan Mallory](#) (via email) or at (404) 446-2589.

Control Center Definition

The CIP Modifications SDT has been responding to a Federal Energy Regulatory Commission (FERC) directive in Order No. 822 concerning protecting the communications between Control Centers, culminating in a proposed CIP-012 standard. During our discussions, we discovered that CIP-012 highlighted some issues primarily with certain substation or generating plant locations that may also relate to the current definition of Control Center.

An example of one issue is field assets such as substation control houses or plant control rooms that may host operating personnel and have communications from their remote terminal units (RTUs) to a Control Center. If these locations currently have or add a remote human-machine interface, or have some other way to affect a unit or breaker at another “geographic location,” then the location could possibly be classified as both a generating resource or substation and a Control Center. In that case, the RTU communication would fall within the scope of CIP-012. The scope of CIP-012 is not intended to include this communication, and implementing the required protection may not be feasible.

The SDT proposed a revised Control Center definition to resolve the issue of Control Center misclassification and adopted language from PER-005-2 to clarify the term “operating personnel” by excluding plant operators and substation field switching personnel with the goal of preventing field assets from being identified as Control Centers when a location does not meet the SDTs understanding of the intent of the Control Center definition. However, based on industry feedback, there are several unintended consequences to this approach. The SDT has decided to address this specific issue by excluding Control Centers that only communicate Real-time Assessment and Real-time monitoring data about the single facility where the Control Center is located from CIP-012.

Other issues were pointed out by entities concerning elements of the currently approved definition, including ambiguity around terms such as “hosting”, “operating personnel”, and “associated data centers” and concerns around authority to operate versus a system’s capability to operate. The core issue is that this facility-based Control Center definition is being used to handle different scenarios for different purposes. One concerns many other non-CIP NERC standards that apply to traditional Control Centers for Balancing Authorities, Reliability Coordinators, and Transmission Operators that have been certified by the Electric Reliability Organization Enterprise and are under the direction of NERC certified System Operators. The intent of the CIP Reliability Standards is for control systems to be identified and categorized based more on their span of control rather than the building or room they are located in or the role of the person using them. However, our inherited constructs that date back to 2003 in the CIP standards have us looking for these systems in Control Centers. This is causing the definition of Control Center to be stretched from a CIP perspective to entities that are not Control Centers from other perspectives so that we can ensure the protection of these control systems. The SDT recognizes that these matters are outside of our Standards Authorization Request (SAR).