

Comment Report

Project Name: 2021-03 CIP-002 Transmission Owner Control Centers | Standard Authorization Requests
Comment Period Start Date: 11/22/2022
Comment Period End Date: 12/21/2022
Associated Ballots:

There were 30 sets of responses, including comments from approximately 105 different people from approximately 89 companies representing 10 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 CIP-002 and CIP-014 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. Do you agree with the proposed scope as described in the modifications to CIP-002 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.**
- 3. Provide any additional comments for the drafting team to consider, if desired.**

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,RF,SERC,Texas RE,WECC	ACES Collaborators	Bob Soloman	Hoosier Energy Electric Cooperative	1	RF
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Amber Skillern	East Kentucky Power Cooperative	1	SERC
					Ryan Strom	Buckeye Power, Inc.	5	RF
					Jennifer Bray	Arizona Electric Power Cooperative, Inc.	1	WECC
					Scott Brame	NC Electric Membership Corporation	3,4,5	SERC
					Nick Fogleman	Prairie Power, Inc.	1	SERC
					Scott Berry	Wabash Valley Power Association	3	RF
MRO	Kendra Buesgens	1,2,3,4,5,6	MRO	MRO NSRF	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Christopher Bills	City of Independence Power & Light	3,5	MRO
					Fred Meyer	Algonquin Power Co.	3	MRO
					Jamie Monette	Allete - Minnesota Power, Inc.	1	MRO
					Larry Heckert	Alliant Energy Corporation Services, Inc.	4	MRO
					Marc Gomez	Southwestern Power Administration	1	MRO

					Matthew Harward	Southwest Power Pool, Inc.	2	MRO
					LaTroy Brumfield	American Transmission Company, LLC	1	MRO
					Bryan Sherrow	Kansas City Board Of Public Utilities	1	MRO
					Terry Harbour	MidAmerican Energy	1,3	MRO
					Jamison Cawley	Nebraska Public Power	1,3,5	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					David Heins	Omaha Public Power District	1,3,5,6	MRO
					George Brown	Acciona Energy North America	5	MRO
					Jaimin Patel	Saskatchewan Power Corporation	1	MRO
					Kimberly Bentley	Western Area Power Administration	1,6	MRO
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

Pacific Gas and Electric Company	Michael Johnson	1,3,5	WECC	PG&E All Segments	Marco Rios	Pacific Gas and Electric Company	1	WECC
					Sandra Ellis	Pacific Gas and Electric Company	3	WECC
					Frank Lee	Pacific Gas and Electric Company	5	WECC
California ISO	Monika Montez	2	WECC	ISO/RTO Council Standards Review Committee (SRC) Project 2021-03 CIP-002	Monika Montez	CAISO	2	WECC
					Bobbi Welch	Midcontinent ISO, Inc.	2	RF
					Kathleen Goodman	ISO-NE	2	NPCC
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Helen Lainis	IESO	2	NPCC
					Elizabeth Davis	PJM	2	RF
					Charles Yeung	Southwest Power Pool, Inc. (RTO)	2	MRO
					Andrew Gallo	Electric Reliability Council of Texas, Inc.	2	Texas RE
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
					Jim Howell, Jr.	Southern Company - Southern Company Generation	5	SERC
					Ron Carlsen	Southern Company - Southern	6	SERC

					Company Generation			
NPCC	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power Coordinating Council	10	NPCC
					Sheraz Majid	Hydro One Networks, Inc.	1	NPCC
					Deidre Altobell	Con Edison	1	NPCC
					John Hastings	National Grid	1	NPCC
					Jeffrey Streifling	NB Power Corporation	1	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC
					Chantal Mazza	Hydro Quebec	1	NPCC
					Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC
					Dan Kopin	Vermont Electric Power Company	1	NPCC
					James Grant	NYISO	2	NPCC
					John Pearson	ISO New England, Inc.	2	NPCC
					Harishkumar Subramani Vijay Kumar	Independent Electricity System Operator	2	NPCC
					Nicolas Turcotte	Hydro-Qu?bec TransEnergie	1	NPCC
					Randy MacDonald	New Brunswick Power Corporation	2	NPCC
					Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
					Michael Jones	National Grid	3	NPCC

David Burke	Orange and Rockland	3	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
David Kwan	Ontario Power Generation	4	NPCC
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
Glen Smith	Entergy Services	4	NPCC
Sean Cavote	PSEG	4	NPCC
Jason Chandler	Con Edison	5	NPCC
Tracy MacNicoll	Utility Services	5	NPCC
Shivaz Chopra	New York Power Authority	6	NPCC
Vijay Puran	New York State Department of Public Service	6	NPCC
ALAN ADAMSON	New York State Reliability Council	10	NPCC
David Kiguel	Independent	7	NPCC
Joel Charlebois	AESI	7	NPCC

1. Do you agree with the proposed scope as described in the CIP-002 and CIP-014 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.

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

Answer No

Document Name

Comment

EI does not support the proposed scope for this SAR because it is unclear the reliability gap associated with RC, PC and TP responsibilities in the identification of critical facilities associated with IROLs. While these registered entities are not identified in CIP-002 or CIP-014 directly, the establishment, identification and communication of IROLs is already contained in other NERC O&P Reliability Standards. Specifically, during Project 2015-09 (Establish and Communicate System Operating Limits) these obligations were addressed. Adding redundant requirements in CIP-002 and CIP-014 would only add unnecessary and duplicative obligations on registered entities. It is also important to note that the modifications made under Project 2015-09 to address these issues have not gone into effect, so at this time it is unknown whether the changes made are sufficient to fully address the concerns identified in this proposed SAR. FAC-014-3, Requirement R5 requires RCs to provide information to PCs, TPs, GOs and TOs (see subparts 5.2 & 5.6) and sub-part R5.6 requires RCs to provide "Each impacted Generator Owner or Transmission Owner, within its Reliability Coordinator Area, with a list of their Facilities that have been identified as critical to the derivation of an IROL and its associated critical contingencies at least once every twelve calendar months." The concerns expressed in this SAR are unnecessary and would add language to CIP-002 and CIP-014 that would create duplicative Requirements in those Reliability Standards and necessitate adding FAC-014-3 to the project scope in order to make conforming changes to that Reliability Standard. For these reasons, we do not support the proposed SAR.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer No

Document Name

Comment

NV Energy supports the comments proposed by EEI, "EEI does not support the proposed scope for this SAR because it is unclear the reliability gap associated with RC, PC and TP responsibilities in the identification of critical facilities associated with IROLs. While these registered entities are not identified in CIP-002 or CIP-014 directly, the establishment, identification and communication of IROLs is already contained in other NERC O&P Reliability Standards. Specifically, during Project 2015-09 (Establish and Communicate System Operating Limits) these obligations were addressed. Adding redundant requirements in CIP-002 and CIP-014 would only add unnecessary and duplicative obligations on registered entities. It is also important to note that the modifications made under Project 2015-09 to address these issues have not gone into effect, so at this time it is unknown whether the changes made are sufficient to fully address the concerns identified in this proposed SAR. FAC-014-3, Requirement R5 requires RCs to provide information to PCs, TPs, GOs and TOs (see subparts 5.2 & 5.6) and sub-part R5.6 requires RCs to provide "Each impacted Generator Owner or Transmission Owner, within its Reliability Coordinator Area, with a list of their Facilities that have been identified as critical to the derivation of an IROL and its associated critical contingencies at least once every twelve calendar months." The concerns expressed in this SAR are unnecessary and would add language to CIP-002 and CIP-014 that would create duplicative Requirements in those Reliability Standards and necessitate adding

FAC-014-3 to the project scope in order to make conforming changes to that Reliability Standard. For these reasons, we do not support the proposed SAR.”

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer

No

Document Name

Comment

This proposed adjustment is out of the scope of responsibility for the PC,TP and RC. If Facilities are not being considered in the applicability section of the standard, than that should be addressed first. Interconnections which are the responsibility of the owners drives the inclusion in these standards, so the responsibility should be kept there. For the purpose of security owners to have the necessary information to assess the standards, the information necessary to assess does not sit with the PC,TP or RC, nor should they. If issues exist with a facility and the location, the it should be considered as a contingency and addressed in TPL-001.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 1,3

Answer

No

Document Name

Comment

Exelon is aligning with EEI in response to this question for both Segments 1 and 3.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Southern Company is in full agreement with the following EEI Comments:

EEI does not support the proposed scope for this SAR because it is unclear the reliability gap associated with RC, PC and TP responsibilities in the identification of critical facilities associated with IROLs. While these registered entities are not identified in CIP-002 or CIP-014 directly, the establishment, identification and communication of IROLs is already contained in other NERC O&P Reliability Standards. Specifically, during Project 2015-09 (Establish and Communicate System Operating Limits) these obligations were addressed. Adding redundant requirements in CIP-002 and CIP-014 would only add unnecessary and duplicative obligations on registered entities. It is also important to note that the modifications made under Project 2015-09 to address these issues have not gone into effect, so at this time it is unknown whether the changes made are sufficient to fully address the concerns identified in the proposed SAR. While we are aware of cost recovery issues that remain unresolved with the identification of IROLs at entity facilities, a NERC Reliability Standard is not an appropriate venue to address such concerns. For these reasons, we do not support the proposed SAR.

Likes 0

Dislikes 0

Response

Justin Kuehne - AEP - 3,5,6

Answer

No

Document Name

Comment

AEP is in agreement with the overall sentiment laid out in EEI's comments on this project. We feel that the proposed scope of this project will lead to duplicative requirements in these standards with little benefit to the safety and reliability of the BES. Please see EEI's comment below:

EEI does not support the proposed scope for this SAR because it is unclear the reliability gap associated with RC, PC and TP responsibilities in the identification of critical facilities associated with IROLs. While these registered entities are not identified in CIP-002 or CIP-014 directly, the establishment, identification and communication of IROLs is already contained in other NERC O&P Reliability Standards. Specifically, during Project 2015-09 (Establish and Communicate System Operating Limits) these obligations were addressed. Adding redundant requirements in CIP-002 and CIP-014 would only add unnecessary and duplicative obligations on registered entities. It is also important to note that the modifications made under Project 2015-09 to address these issues have not gone into effect, so at this time it is unknown whether the changes made are sufficient to fully address the concerns identified in this proposed SAR. FAC-014-3, Requirement R5 requires RCs to provide information to PCs, TPs, GOs and TOs (see subparts 5.2 & 5.6) and sub-part R5.6 requires RCs to provide "Each impacted Generator Owner or Transmission Owner, within its Reliability Coordinator Area, with a list of their Facilities that have been identified as critical to the derivation of an IROL and its associated critical contingencies at least once every twelve calendar months." The concerns expressed in this SAR are unnecessary and would add language to CIP-002 and CIP-014 that would create duplicative Requirements in those Reliability Standards and necessitate adding FAC-014-3 to the project scope in order to make conforming changes to that Reliability Standard. For these reasons, we do not support the proposed SAR.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

AEPC agrees with ACES comments below:

We do not feel the scope of this SAR is correct for Transmission Owner Control Centers (TOCC). The proposed SAR modifications dilute the project. If NERC or Industry feels like there needs to be identification of PACS, EACMS, and PCA under CIP-002, then there should be a separate specific project not scope creep on this project. This projects background and purpose have nothing to do with PACS, EACMS or PCAs. Adding this to the SAR will certainly extend this project beyond the timeline established for this project which is not acceptable.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer No

Document Name

Comment

Ameren agrees with and supports EEI comments.

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 feels the description of this SAR is too vague and not clear on what risk is being addressed. We find no need or added value for the proposed SAR.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 5,6

Answer

No

Document Name

Comment

Constellation agrees with Exelon and EEI comments.

Kimberly Turco on behalf of Constellation Segements 5 and 6.

Likes 0

Dislikes 0

Response

Tristan Miller - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer

No

Document Name

Comment

CenterPoint Energy Houston Electric, LLC (CEHE) supports the comments as submitted by the Edison Electric Institute.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

We do not feel the scope of this SAR is correct for Transmission Owner Control Centers (TOCC). The proposed SAR modifications dilute the project. If NERC or Industry feels like there needs to be identification of PACS, EACMS, and PCA under CIP-002, then there should be a separate specific project

not scope creep on this project. This projects background and purpose have nothing to do with PACS, EACMS or PCAs. Adding this to the SAR will certainly extend this project beyond the timeline established for this project which is not acceptable.

Likes 0

Dislikes 0

Response

Alan Kloster - Evergy - 1,3,5,6 - MRO

Answer

No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric institute (EEI) for question #1.

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

No

Document Name

Comment

Please see the MRO NSRF's comments in question three.

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5,6

Answer

No

Document Name

Comment

Constellation agrees with Exelon and EEI comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6.

Likes 0

Dislikes 0

Response

Michael Johnson - Pacific Gas and Electric Company - 1,3,5 - WECC, Group Name PG&E All Segments

Answer

No

Document Name

Comment

PG&E does not agree with the proposed scope of the SAR and agrees with the input provided by EEI – the contents of the SAR for CIP-002 and CIP-014 were addressed in Project 2015-09 “Establish and Communicate System Operating Limits” and there is no reason to duplicate them in CIP-002 and CIP-014. While it is not a good practice to place references to other Standards within a Standard, a suitable alternative is to make references to the earlier Project 2015-09 work in Implementation Guidance or Technical Rationale documentation.

Likes 0

Dislikes 0

Response

Jennifer Buckman - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer

No

Document Name

Comment

SIGE (Southern Indiana Gas and Electric) supports the comments as submitted by the Edison Electric Institute. SIGE also recommends the SDT add clarification to the SAR regarding the determination of appropriateness of the identification of Facilities critical to the derivation of IROLs by the RC and how it may impact the categorization of the BES Assets.

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6

Answer

No

Document Name

Comment

AZPS does not support the proposed scope for this SAR and agrees with the following EEI comments regarding the CIP-002 and CIP-014 SAR “it is unclear of the reliability gap associated with RC, PC and TP responsibilities in the identification of critical facilities associated with IROLs. While these registered entities are not identified in CIP-002 or CIP-014 directly, the establishment, identification, and communication of IROLs is already contained in other NERC O&P Reliability Standards. Specifically, during Project 2015-09 (Establish and Communicate System Operating Limits) these obligations were addressed. Adding redundant requirements in CIP-002 and CIP-014 would only add unnecessary and duplicative obligations on registered entities. It is also important to note that the modifications made under Project 2015-09 to address these issues have not gone into effect, so at this time it is unknown whether the changes made are sufficient to fully address the concerns identified in this proposed SAR. FAC-014-3, Requirement R5 requires RCs to provide information to PCs, TPs, GOs and TOs (see subparts 5.2 & 5.6) and sub-part R5.6 requires RCs to provide “Each impacted Generator Owner or Transmission Owner, within its Reliability Coordinator Area, with a list of their Facilities that have been identified as critical to the derivation of an IROL and its associated critical contingencies at least once every twelve calendar months.” The concerns expressed in this SAR are unnecessary and would add language to CIP-002 and CIP-014 that would create duplicative Requirements in those Reliability Standards and necessitate adding FAC-014-3 to the project scope in order to make conforming changes to that Reliability Standard. For these reasons, we do not support the proposed SAR.

Likes 0

Dislikes 0

Response

Jamie Monette - Allele - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

MP is in support of EEI's comments related to CIP-002.

Likes 0

Dislikes 0

Response

Amy Wesselkamper - PNM Resources - Public Service Company of New Mexico - 1,3

Answer No

Document Name

Comment

PNM expresses support of EEI comments. "EEI does not support the proposed scope for this SAR because it is unclear the reliability gap associated with RC, PC and TP responsibilities in the identification of critical facilities associated with IROLs. While these registered entities are not identified in CIP-002 or CIP-014 directly, the establishment, identification and communication of IROLs is already contained in other NERC O&P Reliability Standards. Specifically, during Project 2015-09 (Establish and Communicate System Operating Limits) these obligations were addressed. Adding redundant requirements in CIP-002 and CIP-014 would only add unnecessary and duplicative obligations on registered entities. It is also important to note that the modifications made under Project 2015-09 to address these issues have not gone into effect, so at this time it is unknown whether the changes made are sufficient to fully address the concerns identified in this proposed SAR. FAC-014-3, Requirement R5 requires RCs to provide

information to PCs, TPs, GOs and TOs (see subparts 5.2 & 5.6) and sub-part R5.6 requires RCs to provide "Each impacted Generator Owner or Transmission Owner, within its Reliability Coordinator Area, with a list of their Facilities that have been identified as critical to the derivation of an IROL and its associated critical contingencies at least once every twelve calendar months." The concerns expressed in this SAR are unnecessary and would add language to CIP-002 and CIP-014 that would create duplicative Requirements in those Reliability Standards and necessitate adding FAC-014-3 to the project scope in order to make conforming changes to that Reliability Standard. For these reasons, we do not support the proposed SAR."

Likes 0

Dislikes 0

Response

Chantal Mazza - Hydro-Quebec TransEnergie - 1 - NPCC

Answer

Yes

Document Name

Comment

Request clarification of the proposed update. Is this IROL update identifying sites or systems?

Recommend this scope include IROLs that are shared among entities.

Likes 0

Dislikes 0

Response

Ruida Shu - NPCC - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer

Yes

Document Name

Comment

Request clarification of the proposed update. Is this IROL update identifying sites or systems?

Recommend this scope include IROLs that are shared among entities.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 1,5

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Monika Montez - California ISO - 2 - WECC, Group Name ISO/RTO Council Standards Review Committee (SRC) Project 2021-03 CIP-002	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Gail Golden - Entergy - Entergy Services, Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

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

Gail Elliott - International Transmission Company Holdings Corporation - NA - Not Applicable - MRO,RF

Answer

Document Name	
Comment	
No response received from Standard Owner(s) or SMEs	
Likes 0	
Dislikes 0	
Response	

2. Do you agree with the proposed scope as described in the modifications to CIP-002 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.

Amy Wesselkamper - PNM Resources - Public Service Company of New Mexico - 1,3

Answer No

Document Name

Comment

PNM does not agree with the proposed scope for CIP-002 SAR. PNM supports EEI comments.

EEI does not support the proposed scope for this SAR because it is unclear the reliability gap that this SAR intends to close. While it is clear that responsible entities under CIP-002 must identify BES Cyber Systems and their associated BES Cyber assets, the current standard does not implicitly require the development of a list of those assets. This is because lists do not guarantee assets are protected. Moreover, administratively, mistakes in documentation can happen even when affected assets have been identified and properly protected. Additionally, this SAR proposes to move CIP-002 away from a Risk-Based standard to one that is a zero-defect standard which does little to improve BES Reliability, while creating significant compliance burden and risk for responsible entities.

It is also worth considering whether the formal development of discrete lists of Cyber Assets is a forward-looking approach that will last as technology evolves. While over the life of the CIP standards, electronic access control has and will continue to morph from dedicated Cyber Assets (i.e., a discrete HW firewall, a discrete HW domain controller server, etc.) to a function performed in ever more distributed ways. Zero Trust principles may affect access policies. Zero Trust could also result in thousands of logical ESPs around sessions, and thus thousands of EACMS. The concept of EACMS as a discrete 'Cyber Asset' that you can be put on a list will lose meaning over time, rendering a standard obsolete. The technology is headed to electronic access control being a highly distributed function enforced throughout the infrastructure, not a list of dedicated Cyber Assets.

It is also worth noting that virtualization is abstracting 'programmable electronic devices' into a generic hardware resource pool, on top of which many functions are implemented. It is our understanding that the Project 2016-02 SDT is working to incorporate into the PCA definition not only the sharing of a local network, but the sharing of a hypervisor's CPU and memory resources. This type of change will result in dynamic system operation, with a virtual machine becoming a PCA based on where it is executing at the moment. Such a scenario will make the development of discrete lists of categorized BES Cyber Assets nearly impossible, possibly rendering the proposed changes obsolete before the Reliability Standard ever become enforceable.

Likes 0

Dislikes 0

Response

Jamie Monette - Allete - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

MP supports EEI's comments.

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6

Answer

No

Document Name

Comment

AZPS does not support the proposed scope for this SAR because we believe that the current CIP-002 standard clearly requires the identification of high and medium impact BES Cyber Systems while also defining associated EACMS, PACS, and PCAs. Applicability is then used throughout the CIP standards to apply enforceable requirements to these devices. AZPS also supports the following EEI comments related to the CIP-002 SAR "The current standard does not implicitly require the development of a list of those assets. This is because lists do not guarantee assets are protected. Moreover, administratively, mistakes in documentation can happen even when affected assets have been identified and properly protected. Additionally, this SAR proposes to move CIP-002 away from a Risk-Based standard to one that is a zero-defect standard which does little to improve BES Reliability, while creating significant compliance burden and risk for responsible entities.

It is also worth considering whether the formal development of discrete lists of Cyber Assets is a forward-looking approach that will last as technology evolves. While over the life of the CIP standards, electronic access control has and will continue to morph from dedicated Cyber Assets (i.e., a discrete HW firewall, a discrete HW domain controller server, etc.) to a function performed in ever more distributed ways. Zero Trust principles may affect access policies. Zero Trust could also result in thousands of logical ESPs around sessions, and thus thousands of EACMS. The concept of EACMS as a discrete 'Cyber Asset' that you can be put on a list will lose meaning over time, rendering a standard obsolete. The technology is headed to electronic access control being a highly distributed function enforced throughout the infrastructure, not a list of dedicated Cyber Assets.

It is also worth noting that virtualization is abstracting 'programmable electronic devices' into a generic hardware resource pool, on top of which many functions are implemented. It is our understanding that the Project 2016-02 SDT is working to incorporate into the PCA definition not only the sharing of a local network, but the sharing of a hypervisor's CPU and memory resources. This type of change will result in dynamic system operation, with a virtual machine becoming a PCA based on where it is executing at the moment. Such a scenario will make the development of discrete lists of categorized BES Cyber Assets nearly impossible, possibly rendering the proposed changes obsolete before the Reliability Standard ever become enforceable."

Likes 0

Dislikes 0

Response

Jennifer Buckman - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer

No

Document Name

Comment

SIGE does not support the proposed scope for this SAR because the existing CIP standards address the identification of EACMS, PACS, and PCAs. The language referring to BES Cyber Systems and their associated EACMS, PACS, and PCA appears in the CIP Requirements 80 times. An additional regulatory requirement to add them to an identified list is redundant and administratively burdensome with no clearly identified reliability benefit.

Likes 0

Dislikes 0

Response

Michael Johnson - Pacific Gas and Electric Company - 1,3,5 - WECC, Group Name PG&E All Segments

Answer No

Document Name

Comment

PG&E understands the intent of the SAR to explicitly identify EACMS, PACS, and PCA which many Entities have been doing since the early days of CIP-002-5.1a, but we agree with the input by EEI that the creation of a discrete list of Cyber Asset for those devices is going to be more difficult as virtualization expands within the industry. This will be especially true for EACMS as the firewall and access point move from specific devices to potentially every Cyber Asset. The SAR should be modified to address these trends so it does not restrict what a drafting team can do to satisfy NERC's desire to make sure all BCS associated Cyber Assets are identified and appropriately protected.

Likes 0

Dislikes 0

Response

Ruida Shu - NPCC - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer No

Document Name

Comment

We acknowledge that there is a gap in CIP standards on the identification and categorization of cyber assets, but we believe that this gap should not be addressed in CIP-002. The ESP and PSP concepts are not relevant for the assessment performed in regard to the CIP-002 standard, nor EACMS, PCA, and PACS. Bringing these types of cyber assets and concepts into the scope of CIP-002 brings an undesirable burden on demonstrating compliance with the CIP-002 standard, and would require even more multidisciplinary expertise to perform the assessment.

This gap should be filled in CIP standards that already address these concepts and types of cyber assets.

Recommend including Glossary changes to support this SAR.

Please consider the identification of 1) assets in the cloud, and 2) third-party cyber assets.

Request use cases for cyber assets a) on-site entity owned, b) on-site third party owned, c) off-site entity owned and d) off-site third-party owned. And conforming changes in the rest of the CIP Standards.

Request addressing other CIP-002 gaps like the threshold for new assets which have no prior history. Some existing thresholds depend on the prior year's information.

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5,6

Answer No

Document Name

Comment

Constellation agrees with Exelon and EEI comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6.

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer No

Document Name

Comment

Please see the MRO NSRF's comments in question three.

Likes 0

Dislikes 0

Response

Alan Kloster - Evergy - 1,3,5,6 - MRO

Answer No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric institute (EEI) for question #2.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

If adding PACS, PCA, and EACMS to the scope of CIP-002 then those should be updated as a part of Project 2016-02 as there are new Cyber Assets coming into scope under that project or make this a project post Project 2016-02 approval. Further if as an industry we add to CIP-002's scope, not making this change as a part of 2016-02 will require programmatic changes again in the near future for the new asset and sub asset types creating increased and unnecessary compliance burden.

Likes 0

Dislikes 0

Response

Tristan Miller - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer No

Document Name

Comment

CEHE does not support the proposed scope for this SAR because the existing CIP standards address the identification of EACMS, PACS, and PCAs. The language referring to BES Cyber Systems and their associated EACMS, PACS, and PCA appears in the CIP Requirements 80 times. An additional regulatory requirement to add them to an identified list is redundant and administratively burdensome with no clearly identified reliability benefit.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 5,6

Answer No

Document Name

Comment

Constellation agrees with Exelon and EEI comments.

Kimberly Turco on behalf of Constellation Segements 5 and 6.

Likes 0

Dislikes 0

Response

Chantal Mazza - Hydro-Qu?bec TransEnergie - 1 - NPCC

Answer

No

Document Name

Comment

We acknowledge that there is a gap in CIP standards on the identification and categorization of cyber assets, but we believe that this gap should not be addressed in CIP-002. The ESP and PSP concepts are not relevant for the assessment performed in regard of CIP-002 standard, nor EACMS, PCA and PACS. Bringing these types of cyber assets and concepts into the scope of CIP-002 brings an undesirable burden on demonstrating compliance to CIP-002 standard, and would require even more multidisciplinary expertise to perform the assessment.

This gap should be filled in CIP standards that already address these concepts and types of cyber assets.

Recommend including Glossary changes to support this SAR.

Please consider identification of 1) assets in the cloud, 2) third-party cyber assets.

Request use cases for cyber assets a) on-site entity owned, b) on-site third party owned, c) off-site entity owned and d) off-site third-party owned. And conforming changes in the rest of the CIP Standards.

Request addressing other CIP-002 gaps like threshold for new assets which have no prior history. Some existing thresholds depend on the prior year's information.

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 is supportive of EEI comments which state:

EEl does not support the proposed scope for this SAR because it is unclear the reliability gap that this SAR intends to close. While it is clear that responsible entities under CIP-002 must identify BES Cyber Systems and their associated BES Cyber assets, the current standard does not implicitly require the development of a list of those assets. This is because lists do not guarantee assets are protected. Moreover, administratively, mistakes in documentation can happen even when affected assets have been identified and properly protected. Additionally, this SAR proposes to move CIP-002 away from a Risk-Based standard to one that is a zero-defect standard which does little to improve BES Reliability, while creating significant compliance burden and risk for responsible entities.

It is also worth considering whether the formal development of discrete lists of Cyber Assets is a forward-looking approach that will last as technology evolves. While over the life of the CIP standards, electronic access control has and will continue to morph from dedicated Cyber Assets (i.e., a discrete HW firewall, a discrete HW domain controller server, etc.) to a function performed in ever more distributed ways. Zero Trust principles may affect access policies. Zero Trust could also result in thousands of logical ESPs around sessions, and thus thousands of EACMS. The concept of EACMS as a discrete 'Cyber Asset' that you can be put on a list will lose meaning over time, rendering a standard obsolete. The technology is headed to electronic access control being a highly distributed function enforced throughout the infrastructure, not a list of dedicated Cyber Assets.

It is also worth noting that virtualization is abstracting 'programmable electronic devices' into a generic hardware resource pool, on top of which many functions are implemented. It is our understanding that the Project 2016-02 SDT is working to incorporate into the PCA definition not only the sharing of a local network, but the sharing of a hypervisor's CPU and memory resources. This type of change will result in dynamic system operation, with a virtual machine becoming a PCA based on where it is executing at the moment. Such a scenario will make the development of discrete lists of categorized BES Cyber Assets nearly impossible, possibly rendering the proposed changes obsolete before the Reliability Standard ever become enforceable.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer

No

Document Name

Comment

Ameren agrees with and supports EEI comments.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

AEPC agrees with ACES comments below:

If adding PACS, PCA, and EACMS to the scope of CIP-002 then those should be updated as a part of Project 2016-02 as there are new Cyber Assets coming into scope under that project or make this a project post Project 2016-02 approval. Further if as an industry we add to CIP-002's scope, not making this change as a part of 2016-02 will require programmatic changes again in the near future for the new asset and sub asset types creating increased and unnecessary compliance burden. If adding PACS, PCA, and EACMS to the scope of CIP-002 then those should be updated as a part of Project 2016-02 as there are new Cyber Assets coming into scope under that project or make this a project post Project 2016-02 approval. Further if as an industry we add to CIP-002's scope, not making this change as a part of 2016-02 will require programmatic changes again in the near future for the new asset and sub asset types creating increased and unnecessary compliance burden.

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

Answer

No

Document Name

Comment

The SAR specifies "Revise CIP-002 to include the identification of EACMS, PACS, and PCA." While it is important that these Cyber Assets be properly identified and categorized, this is beyond the scope of CIP-002. EACMS and PCA don't exist without an ESP which is drawn in CIP-005 in order to protect BES Cyber Assets identified in CIP-002. Similar for PACS and PSPs in CIP-006. The SDT must have the flexibility to address these gaps in the standards without being limited to looking only at CIP-002.

Likes 0

Dislikes 0

Response

Justin Kuehne - AEP - 3,5,6

Answer

No

Document Name

Comment

AEP is in agreement with the overall sentiment laid out in EEI's comments on this SAR. Please see EEI's comment below:

EEI does not support the proposed scope for this SAR because it is unclear the reliability gap that this SAR intends to close. While it is clear that responsible entities under CIP-002 must identify BES Cyber Systems and their associated BES Cyber assets, the current standard does not implicitly require the development of a list of those assets. This is because lists do not guarantee assets are protected. Moreover, administratively, mistakes in documentation can happen even when affected assets have been identified and properly protected. Additionally, this SAR proposes to move CIP-002

away from a Risk-Based standard to one that is a zero-defect standard which does little to improve BES Reliability, while creating significant compliance burden and risk for responsible entities.

It is also worth considering whether the formal development of discrete lists of Cyber Assets is a forward-looking approach that will last as technology evolves. While over the life of the CIP standards, electronic access control has and will continue to morph from dedicated Cyber Assets (i.e., a discrete HW firewall, a discrete HW domain controller server, etc.) to a function performed in ever more distributed ways. Zero Trust principles will drive this function even further over time as access policies are enforced throughout infrastructures. Zero Trust will drive the industry from network edge perimeters to protection of each system access. In other words, thousands of logical ESPs around sessions, and thus thousands of EACMS. The concept of EACMS as a discrete 'Cyber Asset' that you can be put on a list will lose meaning over time, rendering a standard obsolete. The technology is headed to electronic access control being a highly distributed function enforced throughout the infrastructure, not a list of dedicated Cyber Assets.

It is also worth noting that virtualization is abstracting 'programmable electronic devices' into a generic hardware resource pool, on top of which many functions are implemented. It is our understanding that the Project 2016-02 SDT is working to incorporate into the PCA definition not only the sharing of a local network, but the sharing of a hypervisor's CPU and memory resources. This type of change will result in dynamic system operation, with a virtual machine becoming a PCA based on where it is executing at the moment. Such a scenario will make the development of discrete lists of categorized BES Cyber Assets nearly impossible, possibly rendering the proposed changes obsolete before the Reliability Standard ever become enforceable.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Southern Company is in full agreement with the following EEI Comments:

EEI does not support the proposed scope for this SAR because it is unclear the reliability gap that this SAR intends to close. While it is clear that responsible entities under CIP-002 must identify BES Cyber Systems and their associated BES Cyber assets, the current standard does not implicitly require the development of a list of those assets. This is because lists do not in of themselves guarantee assets are protected. Moreover, administratively, mistakes in documentation can happen even when affected assets have been identified and properly protected. Additionally, this SAR proposes to move CIP-002 away from a Risk-Based standard to one that is a zero-defect standard which does little to improve BES Reliability, while creating significant compliance burden and risk for responsible entities.

It is also worth considering whether the formal development of discrete lists of Cyber Asset is a forward-looking approach that will last as technology evolves. While over the two-decade life of the CIP standards, electronic access control has and will continue to morph from dedicated Cyber Assets (i.e., a discrete HW firewall, a discrete HW domain controller server, etc.) to a function performed in ever more distributed ways. Zero Trust principles will drive this function into literally everything over time as access policies are enforced throughout infrastructures. Zero Trust will drive us from network edge perimeters to protection of each system access; in other words, thousands of logical ESPs around sessions, and thus thousands of EACMS. The concept of EACMS as a discrete 'Cyber Asset' that you can be put on a list will lose meaning over time. The technology is headed to electronic access control being a highly distributed function enforced throughout the infrastructure, not a list of dedicated Cyber Assets (although some will be dedicated).

It is also worth considering that virtualization is abstracting 'programmable electronic devices' into a generic hardware resource pool, on top of which many functions are implemented. It is our understanding that the Project 2016-02 SDT is working to incorporate into the PCA definition not only the sharing of a local network, but the sharing of a hypervisor's CPU and memory resources. This type of change will result in very dynamic system operation, with a virtual machine becoming a PCA based on where it is executing at the moment. Such a scenario will make the development of

discrete lists of categorized BES Cyber Assets nearly impossible, possibly rendering the proposed changes obsolete before the Reliability Standard ever become enforceable.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 1,3

Answer

No

Document Name

Comment

Exelon is aligning with EEI in response to this question for both Segments 1 and 3.

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer

No

Document Name

Comment

SRP supports the comments from EEI.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

No

Document Name

Comment

NV Energy supports the comments proposed by EEI, “EEI does not support the proposed scope for this SAR because it is unclear the reliability gap that this SAR intends to close. While it is clear that responsible entities under CIP-002 must identify BES Cyber Systems and their associated BES Cyber assets, the current standard does not implicitly require the development of a list of those assets. This is because lists do not guarantee assets are protected. Moreover, administratively, mistakes in documentation can happen even when affected assets have been identified and properly protected. Additionally, this SAR proposes to move CIP-002 away from a Risk-Based standard to one that is a zero-defect standard which does little to improve BES Reliability, while creating significant compliance burden and risk for responsible entities.

It is also worth considering whether the formal development of discrete lists of Cyber Assets is a forward-looking approach that will last as technology evolves. While over the life of the CIP standards, electronic access control has and will continue to morph from dedicated Cyber Assets (i.e., a discrete HW firewall, a discrete HW domain controller server, etc.) to a function performed in ever more distributed ways. Zero Trust principles may affect access policies. Zero Trust could also result in thousands of logical ESPs around sessions, and thus thousands of EACMS. The concept of EACMS as a discrete ‘Cyber Asset’ that you can be put on a list will lose meaning over time, rendering a standard obsolete. The technology is headed to electronic access control being a highly distributed function enforced throughout the infrastructure, not a list of dedicated Cyber Assets.

It is also worth noting that virtualization is abstracting ‘programmable electronic devices’ into a generic hardware resource pool, on top of which many functions are implemented. It is our understanding that the Project 2016-02 SDT is working to incorporate into the PCA definition not only the sharing of a local network, but the sharing of a hypervisor’s CPU and memory resources. This type of change will result in dynamic system operation, with a virtual machine becoming a PCA based on where it is executing at the moment. Such a scenario will make the development of discrete lists of categorized BES Cyber Assets nearly impossible, possibly rendering the proposed changes obsolete before the Reliability Standard ever become enforceable.”

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

EEI does not support the proposed scope for this SAR because it is unclear the reliability gap that this SAR intends to close. While it is clear that responsible entities under CIP-002 must identify BES Cyber Systems and their associated BES Cyber assets, the current standard does not implicitly require the development of a list of those assets. This is because lists do not guarantee assets are protected. Moreover, administratively, mistakes in documentation can happen even when affected assets have been identified and properly protected. Additionally, this SAR proposes to move CIP-002 away from a Risk-Based standard to one that is a zero-defect standard which does little to improve BES Reliability, while creating significant compliance burden and risk for responsible entities.

It is also worth considering whether the formal development of discrete lists of Cyber Assets is a forward-looking approach that will last as technology evolves. While over the life of the CIP standards, electronic access control has and will continue to morph from dedicated Cyber Assets (i.e., a discrete HW firewall, a discrete HW domain controller server, etc.) to a function performed in ever more distributed ways. Zero Trust principles may affect access policies. Zero Trust could also result in thousands of logical ESPs around sessions, and thus thousands of EACMS. The concept of EACMS as a discrete ‘Cyber Asset’ that you can be put on a list will lose meaning over time, rendering a standard obsolete. The technology is headed to electronic access control being a highly distributed function enforced throughout the infrastructure, not a list of dedicated Cyber Assets.

It is also worth noting that virtualization is abstracting ‘programmable electronic devices’ into a generic hardware resource pool, on top of which many functions are implemented. It is our understanding that the Project 2016-02 SDT is working to incorporate into the PCA definition not only the sharing of a local network, but the sharing of a hypervisor’s CPU and memory resources. This type of change will result in dynamic system operation, with a

virtual machine becoming a PCA based on where it is executing at the moment. Such a scenario will make the development of discrete lists of categorized BES Cyber Assets nearly impossible, possibly rendering the proposed changes obsolete before the Reliability Standard ever become enforceable.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

We acknowledge that there is a gap in CIP standards on the identification and categorization of cyber assets, but we believe that this gap should not be addressed in CIP-002. The ESP and PSP concepts are not relevant for the assessment performed in regard of CIP-002 standard, nor EACMS, PCA and PACS. Bringing these types of cyber assets and concepts into the scope of CIP-002 brings an undesirable burden on demonstrating compliance to CIP-002 standard, and would require even more multidisciplinary expertise to perform the assessment.

This gap should be filled in CIP standards that already address these concepts and types of cyber assets.

Recommend including Glossary changes to support this SAR.

Please consider identification of 1) assets in the cloud, 2) third-party cyber assets.

Request use cases for cyber assets a) on-site entity owned, b) on-site third party owned, c) off-site entity owned and d) off-site third-party owned. And conforming changes in the rest of the CIP Standards.

Request addressing other CIP-002 gaps like threshold for new assets which have no prior history. Some existing thresholds depend on the prior year's information.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Gail Golden - Entergy - Entergy Services, Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Monika Montez - California ISO - 2 - WECC, Group Name ISO/RTO Council Standards Review Committee (SRC) Project 2021-03 CIP-002

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Gail Elliott - International Transmission Company Holdings Corporation - NA - Not Applicable - MRO,RF

Answer

Document Name

Comment

No response received from Standard Owner(s) or SMEs

Likes 0

Dislikes 0

Response

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

Carl Pineault - Hydro-Quebec Production - 1,5

Answer

Document Name

Comment

If there is a Standard Drafting Team that addresses the IROL question, recommend that SDT include expertise in 1) IROLs and 2) CIP.

This posting is confusing. These two SARs are project 2021-03. We expected a new project (web) page. These two SARs are on the page for project 2016-02 which is CIP-002 Transmission Owner Control Centers (TOCC). Project 2016-02 appears to have an approved SAR for TOCC. The two SARs for project 2021-03 do not explicitly address TOCC. There is only one comment form for project 2021-03. How many SDTs are expected (1, 2 or 3)?

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer

Document Name

Comment

The Transmission Planner, Planning Coordinator should not get involved in the CIP-002 standards. As for CIP-014, if there is a reliability issue it should be identified in the planning studies and addressed operationally through the SOLs. As IROLs are Operating limits this should be the responsibility of the RC. Perhaps the answer here is again to expand the scope of CIP-014 to facilities that have an identified IROL, but not the Functional Entities.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Southern Company's agreement with EEI's comments and addresses our concerns.

Likes 0

Dislikes 0

Response

Justin Kuehne - AEP - 3,5,6

Answer

Document Name

Comment

AEP appreciates the efforts of the SDT for this project. No further comments at this time.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

We appreciate the opportunity to comment.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Chantal Mazza - Hydro-Quebec TransEnergie - 1 - NPCC

Answer

Document Name

Comment

If there is a Standard Drafting Team that addresses the IROL question, recommend that SDT include expertise in 1) IROLs and 2) CIP.

This posting is confusing. These two SARs are project 2021-03. We expected a new project (web) page. These two SARs are on the page for project 2016-02 which is CIP-002 Transmission Owner Control Centers (TOCC). Project 2016-02 appears to have an approved SAR for TOCC. The two SARs for project 2021-03 do not explicitly address TOCC. There is only one comment form for project 2021-03. How many SDTs are expected (1, 2 or 3)?

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 5,6

Answer

Document Name

Comment

Constellation has no additional comments.

Kimberly Turco on behalf of Constellation Segements 5 and 6.

Likes 0

Dislikes 0

Response

Tristan Miller - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer

Document Name

Comment

The existing NERC CIP Evidence Request Tool already requires entities to provide a discreet asset list of EACMS, PACS, and PCAs. Therefore, adding additional requirements to identify these assets is unnecessary and duplicative to existing requirements.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Thank you for the opportunity to comment.

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

Document Name

Comment

The MRO NSRF would like the SAR Drafting Team to consider the following:

- Re-defining EACMS as two separate definitions – Electronic Access Control Systems, and Electronic Access Monitoring Systems (EACS / EAMS). Separating them allows more granularity in the subsequent technical requirements in CIP-007 and CIP-010 (perhaps others).
- o The SAR should have “SAR Type” box “Add, Modify or Retire a Glossary Term” checked.
 - The identification of these Cyber Assets is already required in order to meet and maintain compliance to CIP-005 and CIP-006. For example, the CIP Evidence Request Tool (ERT) version 6 already includes requests for these types of lists (EACMS & PACs) on the ‘Cyber Assets’ tab. However, the CIP ERT is not enforceable, so if these types of lists are to be requested, associated clear requirements are necessary.
 - The MRO NSRF has concerns about creating a zero-defect requirements.

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5,6

Answer

Document Name

Comment

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6.

Likes 0

Dislikes 0

Response

Ruida Shu - NPCC - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer

Document Name

Comment

If there is a Standard Drafting Team that addresses the IROL question, recommend that SDT include expertise in 1) IROLs and 2) CIP.

This posting is confusing. These two SARs are Project 2021-03. We expected a new project (web) page. These two SARs are on the page for project 2016-02 which is CIP-002 Transmission Owner Control Centers (TOCC). Project 2016-02 appears to have an approved SAR for TOCC. The two SARs for project 2021-03 do not explicitly address TOCC. There is only one comment form for project 2021-03. How many SDTs are expected (1, 2, or 3)?

Likes 0

Dislikes 0

Response

Michael Johnson - Pacific Gas and Electric Company - 1,3,5 - WECC, Group Name PG&E All Segments

Answer

Document Name

Comment

PG&E has no additional comments.

Likes 0

Dislikes 0

Response

Jennifer Buckman - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer

Document Name

Comment

The existing NERC CIP Evidence Request Tool already requires entities to provide a discreet asset list of EACMS, PACS, and PCAs. Therefore, adding additional requirements to identify these assets is unnecessary and duplicative to existing requirements.

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6

Answer

Document Name

Comment

AZPS has no additional comments at this time.

Likes 0

Dislikes 0

Response

Jamie Monette - Allete - Minnesota Power, Inc. - 1

Answer

Document Name

Comment

NA

Likes 0

Dislikes 0

Response