

Name (20 Responses)
Organization (20 Responses)
Group Name (13 Responses)
Lead Contact (13 Responses)
Question 1 (32 Responses)
Question 1 Comments (33 Responses)
Question 2 (32 Responses)
Question 2 Comments (33 Responses)
Question 3 (32 Responses)
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Question 6 Comments (33 Responses)

Group
Tennessee Valley Authority
Brian Millard
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
Yes
Individual
Jay Walker
NIPSCO
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes

Yes
Group
PacifiCorp
Sandra Shaffer
Yes
Yes
Individual
Andrew Z. Pusztai
American Transmission Company, LLC
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
Yes
Group
Northeast Power Coordinating Council
Guy Zito
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes

Yes
Individual
Randi Nyholm
Minnesota Power
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
Yes
Individual
Thad Ness
American Electric Power
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
Yes
Individual
Greg Rowland
Duke Energy
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the

standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
Yes
However, the interpretation could be improved by striking the parenthetical "(i.e., without which a Critical Asset cannot function as intended)," from the second paragraph. This parenthetical attempts to define the word "required", which is not necessary for the interpretation.
Group
Southwest Power Pool Regional Entity
Emily Pennel
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation expands the reach of the standard.
As discussed in our comments to Question #5 below, the interpretation for Question 1 introduces a concept not present in the currently approved requirement.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
No
The response to Question 1 states that the examples of the types of Cyber Assets "should be considered." The language "should be considered" is not found in CIP-002/R3 and should not be inferred. While the SPP RE agrees that the list of example Cyber Assets enumerated in R3 is not all inclusive, the list does identify types of Cyber Assets that perform functions that are essential to the operation of the control center. As such, the examples are appropriately classified as Critical Cyber Assets *if* found in a control center that has been identified as a Critical Asset.
No
The response to Question 2 must be revised to specifically include the proviso that redundancy is NOT a consideration when determining if a Cyber Asset is "essential." Redundancy cannot be a consideration because, generally, vulnerability of the redundant asset is the same as the primary asset's vulnerability. To achieve security you have to consider both primary and redundant assets. The interpretation must also incorporate the provisions of CAN-0005 in such a way as to make CAN-0005 no longer necessary.
Individual
Michael Falvo
Independent Electricity System Operator
The request in Question 1 of the Request for Interpretation is asking for clarity on the application of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.

The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
Yes
Individual
Michelle R D'Antuono
Ingleside Cogeneration LP
The request in Question 1 of the Request for Interpretation is asking for clarity on the application of a requirement.
Since the language and intent of a reliability requirement is the ultimate arbiter of compliance, examples may be considered by some auditors to be more than just "information only". Ingleside Cogeneration believes that the request is looking to ensure that a violation will not be assessed because an example is not addressed by a Responsible Entity in the process of identifying its Critical Cyber Assets.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
Question 2 revolves around the meaning of the term "essential" which determines if a Cyber Asset must be identified as a Critical Cyber Asset. This assessment becomes quite complex, especially in the case of mobile remote assets typically used in maintenance and trouble shooting. If CIP physical and electrical protections apply to such devices, some valuable capabilities will be lost. The NERC Board of Trustees indicated that in deciding whether or not to approve a proposed interpretation, it will use a standard of strict construction and not seek to expand the reach of the standard to correct a perceived gap or deficiency in the standard. Do you believe this interpretation expands the reach of the standard?
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
Ingleside Cogeneration LP strongly agrees with the IDT's interpretation that the examples given in R3 should be considered "illustrative, not prescriptive". Our assessment shows two actions taken by NERC in regard to the requirement which support this clarification. First, the entire purpose of NERC's security guideline for "Identifying Critical Cyber Assets" is to provide a means for Responsible Entities to establish which Cyber Assets should be critical. This is a 47 page document with multiple evaluations and complex procedural steps. Clearly a single sentence in a requirement cannot be considered to be exhaustive – or anything more than a suggestion. Second, the statement with the examples has been removed from CIP-002-4, presently pending FERC's approval. It seems apparent to us that this action was taken because the examples only served to confuse Responsible Entities and auditors alike – and are more appropriately addressed in a guideline document.
Yes
We commend the Interpretation Drafting Team for developing a reading of the term "essential" based upon its commonly understood usage. We also agree that it is important to provide gradations which are close to the concept of essentiality, but does not meet the criticality litmus test. This allows the exclusion of Cyber Assets which "may be used, but not required" or are "merely valuable" to the inherent operation of the Critical Asset. It is left up to the Responsible Entity to make those assessments using an internal methodology that is comprehensive and defensible – and is consistent with the intent of CIP-002 as it is written today. We realize this flexibility may be limited in CIP version 5. However, those standards must still go through the vetting process; which will allow the industry to review, post comments, and vote upon any proposed changes.

Group
Bonneville Power Administration
Chris Higgins
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
BPA agrees that the examples in CIP-002 R3 are illustrative and not meant to be prescriptive.
Yes
BPA agrees that if a Cyber Asset is not required, merely "valuable to" the operation of a Critical Asset, it is not essential.
Individual
Kim Koster
MidAmerican Energy Company
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the application of a requirement.
The request is asking for clarity on applying the requirement. The request is asking if laptops at remote locations have to comply with CIP-002 R3.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation expands the reach of the standard.
The request is seeking the definition for the term "essential." Essential is defined in collegiate dictionaries and there is no technical basis for adding clarity to or better defining this term either in an interpretation or in the NERC Glossary of Terms.
No
While we agree with the conclusion in the response to Question 1, we do not believe this interpretation is needed at this time. The response does not provide any new information.
No
MidAmerican Energy does not believe this interpretation is needed at this time. The request is seeking the definition for the term "essential." Essential is defined in collegiate dictionaries and there is no technical basis for adding clarity to or better defining this term either in an interpretation or in the NERC Glossary of Terms. The interpretation provides no new useful information and creates more confusion by introducing the new term "inherent to."
Group
ISO/RTO Council Standards Review Committee
Christine Hasha
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.

The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
Yes
Group
Dominion
Connie Lowe
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
Yes
Individual
Kirit Shah
Ameren
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes

Yes
Individual
Jonathan Appelbaum
United Illuminating Company
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
Yes
Individual
Thomas Johnson
Salt River Project
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the application of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
Yes
Individual
David Thorne
Pepco Holdings Inc
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the

standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
Yes
Individual
Andrew Gallo
City of Austin dba Austin Energy
The request in Question 1 of the Request for Interpretation is asking for clarity on the application of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the application of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
Yes
Group
FirstEnergy
Sam Ciccone
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
Yes
Since there are no question for general comments, we offer them in this last question. Just as a reminder, this Interpretation, once approve, will also need to be added to the pending CIP-002-4 standard which is currently before FERC for approval. It would seem that the Interpretation, if approved, could be added to the Version 4 standard as an errata change.

Group
Southern Company
Shane Eaker
The request in Question 1 of the Request for Interpretation is asking for clarity on the application of a requirement.
The question asks if the examples provided are prescribed to be CCAs or types of equipment that could be assessed as possible CCAs.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The question asks for clarification about the meaning of the word "essential."
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The clarification that the examples are illustrative is helpful in understanding the requirement, but does not expand the reach of the requirement.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
The response to question 2 does not expand the reach of the standard but provides clarity around which cyber assets are essential vs. assets that are valuable but not essential.
Yes
Yes
Individual
Patrick Brown
Essential Power, LLC
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
Yes
Group
Kansas City Power & light
Scott Harris
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.

The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.

The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.

Yes

Yes

IDT clearly defines "essential" in its response. More importantly it states a "valuable" asset is not necessarily "essential" to the operation of a Critical Asset, thereby, indirectly addressing Duke's concern with physical controls around workstations such as laptops when used from remote locations.

Individual

Anthony Jablonski

ReliabilityFirst

The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.

The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.

The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.

The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.

The interpretation for Question 2 could be construed as restricting the reach of the standard.

Yes

No

The Interpretation's "Response to Question 2" may render CIP-002-3 through CIP-009-3 non-functional. The statement, "A Cyber Asset that 'may' be used, but is not 'required' (i.e., without which a Critical Asset cannot function as intended), for the operation of a Critical Asset is not 'essential to the operation of the Critical Asset' for purposes of Requirement R3" transforms CIP-002-3 R3 into a single point of failure analysis. Cyber systems used in the operation of the BES are designed so there is no single point of failure. Therefore, there would be no Critical Cyber Assets in the meaning stated by the "Response to Question 2." The Interpretation must be revised to make clear that any Cyber Asset, even if replicated locally or remotely, that, if damaged, lost or compromised, can have a negative impact on the reliable operation of the associated Critical Asset must be identified as a Critical Cyber Asset.

Individual

Ron Donahey

Tampa Electric Company

The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.

The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.

The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.

The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
Tampa Electric agrees with the Interpretations Drafting Team response to Question 1
Yes
Tampa Electric agrees with the Interpretations Drafting Team response to Question 2. We strongly support the concept that essential to the operation of the Critical Asset means that it is necessary for the operation of that Critical Asset.
Group
MISO Standards Collaborators
Marie Knox
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request seeks clarification of whether the phrase at issue is illustrative or prescriptive. As a result, MISO submits that the request is asking for clarity on the meaning of the requirement as opposed to the application thereof.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request seeks clarification of the meaning of "essential to the operation of the Critical Asset" in CIP-002. As a result, MISO submits that the request is asking for clarity on the meaning of the requirement as opposed to the application thereof.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
MISO submits that, by clarifying that the list of examples at control centers and backup control centers in Requirement R3 is illustrative and not prescriptive, the Interpretation does not expand the reach or scope of the standard.
The interpretation for Question 2 of the Request for Interpretation expands the reach of the standard.
MISO submits that, by clarifying that a Critical Cyber Asset ("CCA") must be required by a Critical Asset ("CA") such that the CA cannot function as intended without the CCA, the Interpretation does not expand the reach or scope of the standard.
Yes
MISO agrees with the Interpretation as to Question 1.
Yes
MISO generally agrees with the Interpretation as to Question 2, however MISO also requests that the Interpretation Drafting Team clarify that "essential," as used in Requirement R3, is synonymous with "inherent", "necessary" and "required". MISO also submits that Registered Entities are best qualified to determine whether a Cyber Asset is essential to the operation of a CA and is therefore a CCA pursuant to the clarification provided by the Interpretation. As a result, a Registered Entity's determination of whether a Cyber Asset is required by a CA should be rebuttably presumed to be correct.
Individual
Christina Bigelow
Midwest ISO
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request seeks clarification of whether the phrase at issue is illustrative or prescriptive. As a result, MISO submits that the request is asking for clarity on the meaning of the requirement as opposed to the application thereof.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request seeks clarification of the meaning of "essential to the operation of the Critical Asset" in

CIP-002. As a result, MISO submits that the request is asking for clarity on the meaning of the requirement as opposed to the application thereof.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
MISO submits that, by clarifying that the list of examples at control centers and backup control centers in Requirement R3 is illustrative and not prescriptive, the Interpretation does not expand the reach or scope of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
MISO submits that, by clarifying that a Critical Cyber Asset ("CCA") must be required by a Critical Asset ("CA") such that the CA cannot function as intended without the CCA, the Interpretation does not expand the reach or scope of the standard.
Yes
MISO agrees with the Interpretation as to Question 1.
Yes
MISO generally agrees with the Interpretation as to Question 2, however MISO also requests that the Interpretation Drafting Team clarify that "essential," as used in Requirement R3, is synonymous with "inherent", "necessary" and "required". MISO also submits that Registered Entities are best qualified to determine whether a Cyber Asset is essential to the operation of a CA and is therefore a CCA pursuant to the clarification provided by the Interpretation. As a result, a Registered Entity's determination of whether a Cyber Asset is required by a CA should be rebuttably presumed to be correct.
Group
ACES Power Marketing Standards Collaborators
Jason Marshall
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
Yes
While we agree with the drafting team, we recommend rewording "(i.e. without which a Critical Asset cannot function as intended)" to "(i.e. the Critical Asset cannot function without the Cyber Asset)". While the wording is technically correct, it is difficult to read and can be confusing.
Group
Imperial Irrigation District (IID)
Jesus Sammy Alcaraz
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.

The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
Yes
Individual
Joe Doetzi
CRSI
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
No
The definition provided for essential is much narrower than the guidance provided in the Security Guideline for the Electricity Sector: Identifying Critical Cyber Assets. The interpretation does not provide additional clarity than what is provided in the existing guideline.
Individual
Darryl Curtis
Oncor Electric Delivery Company
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
Yes

Individual
DANA SHOWALTER
E.ON CLIMATE & RENEWABLES
The request in Question 1 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The request in Question 2 of the Request for Interpretation is asking for clarity on the meaning of a requirement.
The interpretation for Question 1 of the Request for Interpretation does not expand the reach of the standard.
The interpretation for Question 2 of the Request for Interpretation does not expand the reach of the standard.
Yes
Yes