

Individual or group. (25 Responses)

Name (14 Responses)

Organization (14 Responses)

Group Name (11 Responses)

Lead Contact (11 Responses)

IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (3 Responses)

Comments (25 Responses)

Question 1 (21 Responses)

Question 1 Comments (22 Responses)

Group
Salt River Project
Bob Steiger
Yes
Group
Northeast Power Coordinating Council
Guy Zito
Yes
Individual
Paul Crosby
Platte River Power Authority
No
Platte River agrees with the entire interpretation up to the last sentence. R1.2.5 says an entity must consider systems and facilities that meet all of the following: 1. Critical to automatic load shedding, 2. Under a common control system, and 3. Capable of shedding 300 MW or more Systems that do not meet all three criteria listed above (regardless of potential or capability) do not meet the criteria found in CIP-002-3. Platte River suggests the IDT replace the last sentence with the following language, "Therefore, an AMI system specifically built and configured to perform the Remote Disconnect function that is not: critical to automatic load shedding, under a common control system, or capable of shedding 300 MW or more would not meet the criteria found in CIP-002-3, Requirement R1.2.5.
Individual
Thad Ness
American Electric Power
Yes
Individual
Nazra Gladu
Manitoba Hydro
Yes

No comment.
Group
MRO NSRF
WILL SMITH
The NSRF agrees with this interpretation but request the following wording to provide additional clarity. The Interpretation team needs to clearly state that no matter what system or facilities are employed to automatically load shed, there must be a "common control system" utilized capable of shedding 300 Mw or more. For example, If an Entity had employed UFLS of 250 Mw's under a discrete common control system and an AMI system of 100 Mw utilizing a different discrete common control system, then neither the UFLS or AMI control systems meet the minimum threshold of 300 Mw (under a common control system since each system uses a different control system) and would not need to be considered by R2. R1.2.5 does not aggregate "all systems" but utilizes the language of "common control system". Therefore, if the UFLS and AMI did not utilize the same (common control) system, and each individually fell below the 300Mw threshold, neither would need to be considered.
Group
Associated Electric Cooperative, Inc. - JRO00088
David Dockery - NERC Reliability Compliance Coordinator
Yes
While AECI agrees with both this draft interpretation's Response, and the assertions made within this Comment Form's "Background Information" section, we do not believe the two necessarily agree with one another.
Group
ACES Power Marketing and Members
Trey Cross
Yes
We agree with the CIP Interpretation Drafting Team (IDT) in determining that a registered entity's RBAM should consider all equipment used to provide BES functionality by using a risk-based assessment methodology (RBAM). AMI technology should be considered in the RBAM with the proper analysis that it is not considered a CCA if the AMI is not designed or cannot shed load of 300 MW or more without human operator intervention.
Individual
Patrick Brown
Essential Power, LLC
Yes
Individual
Michelle R. D'Antuono
Ingleside Cogeneration LP
Yes
Ingleside Cogeneration LP believes that the updated interpretation comes to a far more definitive conclusion than the original draft. By stating unequivocally that an AMI function would not be considered a BES Critical Asset provided it was configured to perform remote disconnects in response to a manual action, the drafting team has captured a vital concept in our view. That is; it is possible to imagine a cyber scenario where almost any normally-docile microprocessor-based device with remote communications capability could be transformed into a base of operations for hostile interests. Although these scenarios are taken seriously, the extra expense required to cyber-harden these promising technologies will very likely delay or even prevent their deployment. To us, this threat of

over-regulation is just as great – or greater – threat to long term BES reliability as a potential cyber attack could be. Without such Smart Grid capabilities, the industry will not be able to deploy the systems necessary to incorporate renewables, enhance wide-area monitoring capabilities, and encourage electricity conservation that society expects out of the next-generation BES.

Individual

David Jendras

Ameren

Yes

We believe that if a system has the ability to automatically shed load of 300 MW or more, Smart Grid or otherwise, it should be subject to CIP-002 R1.2.5. As OGE has stated, their Smart Grid advanced meter infrastructure presently is not designed to perform automated load shedding, although this capability could be provided in the future by some reprogramming. A system should be judged by what it is designed to do presently, and not what it could do in the future after it is modified. Therefore, we agree with the proposed interpretation.

Individual

Judy VanDeWoestyne

MidAmerican Energy Company

Yes

We recommend two changes in the final paragraph of the interpretation for clarification. 1 - Insert after "300 MW or more" the words "under an individual common control system" to clarify values from separate common control systems should not be aggregated. 2 - Insert after "automatically shed load" the words "for a critical BES reliability purpose" so it reads: "Therefore, if a system or facility such as AMI meets the specifications of Requirement 1.2.5 (i.e., is both capable of shedding 300 MW or more under an individual common control system and is set up and purposed to automatically shed load for a critical BES reliability purpose), the Responsible Entity should consider the system or facility for identification as a Critical Asset under its RBAM. Otherwise, the Responsible Entity is not required to consider the system or facility for identification as a Critical Asset."

Individual

Michael R. Lombardi

Northeast Utilities

Yes

Group

Duke Energy

Greg Rowland

Yes

Duke Energy agrees with the interpretation.

Individual

Brett Holland

Kansas City Power & Light

Yes

Additional clarification regarding the applicability of BES facilities is contained in the the last paragraph of the first page in the Background Section. This information is helpful in understanding the intent of the requirement. Unfortunately, this information is not included in the interpretation. Similarly, in the third paragraph of the Background Section on the second page specific clarification is given reminding entities that they need to "consider" whether assets described in Requirement 1.2.5 should be designated as Critical Assets. This reminder is also missing from the interpretation. While

we agree with the interpretation, inclusion of this additional information in the interpretation itself will definitely be a plus and provide further clarification of the requirement.

Group

Western Small Entity Comment Group

Steve Alexanderson P.E.

No

Please see our last comments and the SDT's response. The SDT apparently imagines applying Advanced Meter Infrastructure (AMI) remote service disconnects at transmission level voltages. OGE made it clear in their request for interpretation that they are asking about remote controlled AMI disconnects that serve individual retail customers. These disconnects are either located within a socket style meter, or within a sleeve located between a meter and meter base. Either way, clearance and safety dictate that transmission level voltages cannot be routed through these devices. These devices and their controls cannot be made subject to NERC mandatory standards regardless of how they are configured, since section 215 clearly states "The ERO shall have authority to develop and enforce compliance with reliability standards for only the bulk-power system", and when defining "bulk-power system" states "The term does not include facilities used in the local distribution of electric energy."

Group

Entergy

James Gower

Agree

Entergy echoes OGE's initial comments in the interpretation request.

Group

SPP Standards Review Group

Robert Rhodes

Yes

Additional clarification regarding the applicability of BES facilities is contained in the the last paragraph of the first page in the Background Section. This information is helpful in understanding the intent of the requirement. Unfortunately, this information is not included in the interpretation. Similarly, in the third paragraph of the Background Section on the second page specific clarification is given reminding entities that they need to "consider" whether assets described in Requirement 1.2.5 should be designated as Critical Assets. This reminder is also missing from the interpretation. While we agree with the interpretation, inclusion of this additional information in the interpretation itself will definitely be a plus and provide further clarification of the requirement.

Individual

Cheryl Moseley

Electric Reliability Council of Texas, Inc.

No

Requirement R1.2.5. requires that, "Systems and facilities critical to automatic load shedding under a common control system capable of shedding 300 MW or more." The requirement addresses capability, it does not address and should not address, the intentional use of the system or facility. One of the purposes of the CIP standards is to address misuse and the breach of systems to perform functions not planned. These systems and facilities should be assessed for criticality because of the potential effect on system reliability. By adding language regarding the intended use of the systems or facilities, the IDT has materially changed the requirement.

Group

Bonneville Power Administration

Jamison Dye

Yes
Individual
Rich Salgo
NV Energy
Yes
Agree with the interpretation. I question whether an interpretation was necessary in this instance, however. The requirement language is clear and unambiguous that the asset need only be considered if it performs automatic load shedding, which clearly excludes the AMI circumstance that was posed.
Individual
Tony Kroskey
Brazos Electric Power Cooperative, Inc.
Agree
ACES Power Marketing
Group
GP Strategies
Mary Jo Cooper
Yes
We agree with the interpretation. Furthermore, we feel this interpretation is also equivalent to other relays that may have the ability to shed load in a distribution system, which are designed to control the distribution system rather than part of the BES undervoltage or underfrequency load shedding plan, that similiary should not be included in the category for identifying critical assets.
Individual
Darryl Curtis
Oncor Electric Delivery Company LLC
Yes
Oncor is in agreement with the Interpretation Drafting Team's interpretation that an Advanced Meter Infrastructure (AMI) system specifically built and configured to perform the Remote Disconnect function, and does not automatically shed load without human operator initiation, would not meet the criteria found in CIP-002-3, Requirement R1.2.5 for consideration as a Critical Asset.
Individual
Oliver Burke
Entergy Services, Inc. (Transmission)
Agree
OGE's comments on the standard.