Unofficial Comment Form

Project 2014-02 CIP Version 5 Revisions – Cyber Security Standards

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=b1928902f8c741218f2a1cf4c7191015) to submit comments on the proposed draft CIP standards. The electronic comment form must be completed **by 8 p.m. Eastern on Friday, October 17, 2014**.

All documents and information about this project are available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project-2014-XX-Critical-Infrastructure-Protection-Version-5-Revisions.aspx). If you have questions please contact Marisa Hecht at marisa.hecht@nerc.net or by telephone at 404-446-9620 or Ryan Stewart at ryan.stewart@nerc.net or by telephone at 202-644-8091.

## Background Information

On November 22, 2013, FERC issued Order No. 791, *Version 5 Critical Infrastructure Protection*

*Reliability Standards*. In this order, FERC approved version 5 of the CIP standards, and also directed that

NERC make the following modifications to those standards:

1. Modify or remove the “identify, assess, and correct” language in 17 CIP version 5 requirements.
2. Develop modifications to the CIP standards to address security controls for Low Impact assets.
3. Develop requirements that protect transient electronic devices.
4. Create a definition of “communication networks” and develop new or modified standards that address the protection of communication networks.

FERC directed NERC to submit new or modified standards responding to the directives related to the “identify, assess, and correct” language and communication networks by February 3, 2015, one year from the effective date of FERC Order No. 791. FERC did not place any time frame for NERC to respond to the

Low Impact and transient electronic devices directives.

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

## Questions

1. For the requirements applicable to Low Impact assets, the Standard Drafting Team (SDT) changed the structure of CIP-003-6, Requirements R1 and R2 and revised the language in response to stakeholder comments. Do you agree with the proposed requirements including CIP-003-6 Attachment 1? If not, please explain your objections and offer suggested revisions.

Yes:

No:

Comments:

1. The SDT proposed new definitions **Low Impact External Routable Connectivity** and **Low Impact BES Cyber System Electronic Access Point** to clarify the requirement language in CIP-003-6. Do you agree with the proposed new definitions? If not, please offer suggested revisions.

Yes:

No:

Comments:

1. For the requirements applicable to transient devices, the SDT changed the structure of CIP-010-2, Requirement R4 and revised the language in response to stakeholder comments. Do you agree with the proposed requirements including CIP-010-2 Attachment 1? If not, please explain your objections and offer suggested revisions.

Yes:

No:

Comments:

1. The SDT revised the proposed new definitions for Transient Cyber Assets and Removable Media to address issues raised in stakeholder comments. Do you agree with the proposed definitions? If not, please offer suggested revisions.

Yes:

No:

Comments:

1. In response to stakeholder comments, the SDT revised the implementation deadlines. The implementation plan now includes tiered deadlines for the aspects of CIP-003-6. The CIP-007-6 timeframe is now consistent with CIP-006-6.  Are these timeframes reasonable and appropriate?  If not please explain specifically which implementation plan item needs adjusting and include the rationale for the suggested change.

Yes:

No:

Comments:

1. The results of the initial CIP V5 Revisions ballot showed industry support for the new Communication Networks requirements and the removal of the Identify, Assess, and Correct (IAC) language from 17 requirements. These two directive areas have a FERC filing deadline of February 3, 2015. Meanwhile, the CIP-003-6 and CIP-010-2 revisions proposed to address the Low Impact and Transient Devices directives did not pass initial ballot.

In order to separate approval of the IAC and Communication Networks revisions from the Low Impact and Transient Device revisions where they occur within the same standard, the relevant standards are posted separately. This separate posting provides additional options to meet the FERC filing deadline of February 3, 2015 in the event Low Impact or Transient Device revisions do not obtain industry approval in the current ballot. (Please see explanatory document on the CIP Version 5 Revisions project page for more information)

Do you support removal of the IAC language from the 17 Requirements across CIP Version 5 Standards? If not, please explain why.

Yes:

No:

Comments:

1. Do you have input not discussed in the questions above on other areas relative to the revisions made to the standards or implementation plan since the initial posting and within the scope of the Standards Authorization Request? If so, please provide them here, recognizing that you do not have to provide a response to all questions.

Yes:

No:

Comments: