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=f9b7d210fe9048dfbd469a6f6c7dd9e3) to submit comments on the proposed draft CIP standards. The electronic comment form must be completed by **8 p.m. Eastern, July 16, 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. The Standard Drafting Team (SDT) developed objective criteria in the processes in CIP-003, Requirement R2 to address the directive in FERC Order No. 791. Do you agree with the approach to meeting this directive? If not, please offer suggested revisions.

Yes:

No:

Comments:

1. The SDT developed CIP-006, Requirement R1, Part 1.10 and revised CIP-007, Requirement R1, Part 1.2 to meet the directive in FERC Order No. 791 to address protections for nonprogrammable components of communication networks. Do you agree with the approach to meeting this directive? If not, please offer suggested revisions.

Yes:

No:

Comments:

1. The SDT developed CIP-010, Requirement R4 and revised CIP-004, Requirement R1, Part 2.1.9 to meet the directive in FERC Order No. 791 to address transient devices (Transient Cyber Assets and Removable Media). Do you agree with the approach to meeting this directive? If not, please offer suggested revisions.

Yes:

No:

Comments:

1. The SDT proposed new definitions for Transient Cyber Assets and Removable Media and revised definitions for BES Cyber Asset and Protected Cyber Assets. Do you agree with the new and revised definition? If not, please offer suggested revisions.

Yes:

No:

Comments:

1. The SDT removed the Identify, Assess, and Correct (IAC) language from 17 requirements to meet the directive in FERC Order No. 791 to remove or modify the IAC language. Do you support this revision approach? If not, why not and what alternative approach do you recommend?

Yes:

No:

Comments:

1. The Implementation Plan uses the existing effective date of the FERC approved CIP V5 Standards for CIP-003-6 Requirement R2 and provides additional time for compliance for CIP-006-6, Requirement R1, Part 1.10; CIP-007-6, Requirement R1, Part 1.2; and CIP-010-2, Requirement R4. Are the timeframes reasonable and appropriate? If not, please explain.

Yes:

No:

Comments:

1. Are there any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standards? If yes, please identify the jurisdiction and specific regulatory requirements.

Yes:

No:

Comments:

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

Yes:

No:

Comments: