South Carolina Electric & Gas Request for Interpretation August 9, 2007

We would like to request a formal interpretation of CIP-006-1.

CIP-006-1, R1.1. says a physical security plan should address "Processes to ensure and document that all Cyber Assets within an Electronic Security Perimeter also reside within an identified Physical Security Perimeter. Where a completely enclosed ("sixwall") border cannot be established, the Responsible Entity shall deploy and document alternative measures to control physical access to the Critical Cyber Assets."

Also in CIP-006-1, under Additional Compliance Information, 1.4.4 states "For dial-up accessible Critical Cyber Assets that use non-routable protocols, the Responsible Entity shall not be required to comply with Standard CIP-006 for that single access point at the dial-up device."

The Additional Compliance Information seems to provide an exception to the requirement.

Are dial-up RTUs that use non-routable protocols and have dial-up access required to have a six-wall perimeters or are they exempted from CIP-006-1 and required to have only electronic security perimeters? This has a direct impact on how any identified RTUs will be physically secured.

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