

February 17, 2021

VIA ELECTRONIC FILING

Mr. Neil Cunningham
Director of Climate Change and Energy Branch
Department of Sustainable Development
1200-155 Carlton Street
Winnipeg MB R3C 3H8

RE: *North American Electric Reliability Corporation*

Dear Mr. Cunningham:

The North American Electric Reliability Corporation (“NERC”) hereby submits Notice of Withdrawal of the North American Electric Reliability Corporation for Proposed Reliability Standard CIP-002-6. NERC requests, to the extent necessary, a waiver of any applicable filing requirements with respect to this filing.

NERC understands that the Province of Manitoba enacted on April 1, 2012, the Reliability Standards Regulation, which was implemented through an Order of Council. It is NERC’s understanding that the Reliability Standards Regulation makes compliance with the NERC reliability standards a legal requirement in Manitoba and adopted the NERC Reliability Standards listed in Schedule 1 of the Regulation for implementation in Manitoba. The Regulation further provides that a reliability standard made by NERC that is listed in Schedule 1 is adopted as a reliability standard for Manitoba.

NERC requests that Manitoba take all necessary action to withdraw Proposed Reliability Standard CIP-002-6.

Please contact the undersigned if you have any questions concerning this filing.

Sincerely,

/s/ Lauren Perotti

Lauren Perotti
*Senior Counsel for the North American Electric
Reliability Corporation*

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**BEFORE THE
PROVINCE OF MANITOBA**

**NORTH AMERICAN ELECTRIC)
RELIABILITY CORPORATION)**

**NOTICE OF WITHDRAWAL OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
FOR PROPOSED RELIABILITY STANDARD CIP-002-6**

The North American Electric Reliability Corporation (“NERC”) hereby submits this notice of withdrawal for proposed Reliability Standard CIP-002-6.

I. Background

On June 22, 2020, NERC submitted a Notice of Filing of proposed Reliability Standard CIP-002-6.¹ In the filing, NERC also sought the retirement of currently effective Reliability Standard CIP-002-5.1a.

II. Support for Withdrawal

At its February 4, 2021 meeting, the NERC Board of Trustees approved a resolution to withdraw proposed Reliability Standard CIP-002-6.² NERC therefore provides notice of withdrawal of NERC’s June 22, 2020 Notice of Filing of proposed Reliability Standard CIP-002-6 and the retirement of currently effective Reliability Standard CIP-002-5.1a. In light of recent cybersecurity events and the evolving threat landscape, NERC asserts that additional caution is warranted regarding any criteria that may permit more entities to categorize Bulk Electric System (“BES”) Cyber Systems as low impact, such as the revisions proposed in CIP-002-6, and

¹ *Notice of Filing of Proposed Reliability Standard CIP-002-6* (June 22, 2020).

² *See* NERC Board of Trustees February 4, 2021 Agenda Package Item 7.b, available at https://www.nerc.com/gov/bot/Agenda%20highlights%20and%20Mintues%202013/Board_Open_Meeting_Agenda-Feb-4-2021_PUBLIC_ONLY.pdf.

recommends further study. As a result, NERC withdraws proposed Reliability Standard CIP-002-6 until NERC has had the opportunity to reevaluate the criterion based on additional data and studies.

Respectfully submitted,

/s/ Marisa Hecht

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