

August 20, 2012

VIA ELECTRONIC FILING

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

Re: Petition of the North American Electric Reliability Corporation for Approval of an Interpretation to Reliability Standard CIP-002-4 – Critical Cyber Asset Identification, North American Electric Reliability Corporation, FERC Docket No. RD12-5-000

Dear Ms. Bose:

On August 1, 2012, NERC filed a Petition for Approval of an Interpretation to Reliability Standard CIP-002-4 – Critical Cyber Asset Identification.

NERC's petition states that the proposed interpretation applies to all versions of the CIP-002 standard, and makes reference to the phrase "Examples at control centers and backup control centers include systems and facilities at master and remote sites that provide monitoring and control, automatic generation control, real-time power system modeling, and real-time inter-utility data exchange," which is included in Requirement R3 of CIP-002-1, CIP-002-2, and CIP-002-3. However, this phrase was modified in CIP-002-4, and the requirement no longer includes examples. Therefore, with respect to the above phrase, the interpretation of CIP-002 should only apply to CIP-002-1, CIP-002-2, and CIP-002-3, and does not apply to CIP-002-4. NERC submits this filing to correct the record.

In addition, due to the renumbering of requirements in CIP-002-4, the word "essential" referenced in the proposed interpretation now appears in Requirement R2 of CIP-002-4. However, in CIP-002-1, CIP-002-2, and CIP-002-3, the word "essential" is found in Requirement R3. This is unclear in NERC's petition, and NERC submits this filing to correct the record.

Accordingly, NERC respectfully requests that the Commission take note of this errata filing, and issue an order consistent with NERC's filings submitted in this proceeding.

Respectfully submitted,

/s/ Willie L. Phillips
Willie L. Phillips
Attorney for NERC

cc: Official service lists in Docket No. RD12-5-000

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