

**Individual or group. (15 Responses)**

**Name (10 Responses)**

**Organization (10 Responses)**

**Group Name (5 Responses)**

**Lead Contact (5 Responses)**

**IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (2 Responses)**

**Comments (15 Responses)**

**Question 1 (12 Responses)**

**Question 1 Comments (13 Responses)**

**Question 2 (0 Responses)**

**Question 2 Comments (13 Responses)**

Individual
John Falsey
Invenergy LLC
Agree
Group
Northeast Power Coordinating Council
Guy Zito
Yes
Individual
Shannon Fair
Colorado Springs Utilities
Yes
Colorado Springs Utilities agrees with the interpretations of the single CIP Manager per Registered Entity ID.
Group
MISO
Dave Francis
Agree
MISO, PJM, SPP, IESO

Group
Southern Company: Southern Company Services, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing
Pamela R. Hunter
Yes
Individual
Nazra Gladu
Manitoba Hydro
No comment.
No comment.
Individual
Michael Falvo
Independent Electricity System Operator
Yes
Individual
Wryan J. Feil
Northeast Utilities
Yes
Individual
RoLynda Shumpert
South Carolina Electric and Gas
Yes
Individual

Brian S. Millard
Tennessee Valley Authority
Yes
Individual
Warren Cross
ACES
Yes
ACES supports the interpretation that a Registered Entity cannot assign different CIP Senior Managers for different applicable functions if those functions are included under one registration (NERC ID). It would be better if the standard said, "per registered entity ID".
NA
Individual
Thad Ness
American Electric Power
No
AEP strongly opposes the interpretation of the IDT. The standard provides various entities which could serve as a "Responsible Entity", a majority of which are functions such as Generator Owner, Generator Operator, etc. By allowing such functions to serve as Responsible Entities, the Standard effectively allows them to designate CIP Senior Managers as necessary. Nowhere does the Standard support the IDT's interpretation that the Registered Entity must designate a sole CIP Senior Manager. In addition, and though it may be beyond the scope of the IDT, usage of the term "Responsible Entity" needs further review. The fact that it is capitalized infers that it is included in the NERC Glossary, though it is not. As a result, the standard attempts to prescribe examples for the phrase, which has led to confusion for some and has prompted this interpretation request. The Responsible Entity Senior CIP Manager designation, as the interpretation views it, reduces flexibility and alignment within an organization's corporate or operating structure. While the drafting team did provide some potential solutions as outlined in the unofficial comment form, changing registration to fit into the box created by this interpretation, has widespread implication outside of the CIP standards. In addition, we are concerned by the amount of supporting information included in the comment form. Though obviously well-intentioned, the information provided is, by the IDTs own admission "for discussion and demonstration purposes". Such guidance cannot be relied upon by an entity during an audit, and because of this, any information deemed worthy to support in the interpretation should be included within the official interpretation itself.

Group
Bonneville Power Administration
Jamison Dye
Yes
Group
Dominion NERC Compliance Policy
Randi Heise
Yes
Individual
Cheryl Moseley
Electric Reliability Council of Texas, Inc.
No
<p>The interpretation is inconsistent with the plain language of the standard. There is nothing ambiguous or unclear about the plain language of the standard. Accordingly, the IDT's reliance on and interpretation of other documents (e.g. Rules of Procedure) to support the interpretation is misplaced, inappropriate and inconsistent with the plain language and scope of the standard. 1. The applicability section defines Responsible Entity in terms of specific functions, not the Registration ID of an entity. According to the Standards Process Manual, "Generally, each Requirement of a Reliability Standard shall identify, "What functional entity shall do what under what conditions to achieve what reliability objective." This is addressed to the functional entity, not a Registration ID. 2. There are inconsistencies in the registration processes. Some entities are assigned one Registration ID while others are assigned multiple Registration IDs. A review of the NERC Compliance Registry Matrix shows the discrepancies in how Registration IDs are assigned. 3. The standards are developed to identify "what" a Responsible Entity is to do, not "how" the entity manages their organization. R2 then states the "Responsible Entity" shall assign a single manager for the CIP implementation. Accordingly, a registered entity responsible for multiple functions can have a single manager for the CIP implementation related to each of its functions. That is a right under the standard, and the interpretation impermissibly compromises that right. 4. The interpretation compromises the effectiveness of the CIP implementation. If an entity believes that the CIP implementation is best supported by the assignment of different senior managers for each function that it performs, then it should be allowed to implement that structure. This provides the construct to allow true experts to be responsible for the CIP implementation related to</p>

the structure best suited for their particular circumstances and business needs. The position noted herein, is supported by FERC's discussion of this requirement in Order 706: The Commission adopts its CIP NOPR interpretation that Requirement R2 of CIP-003-1 requires the designation of a single manager who has direct and comprehensive responsibility and accountability for implementation and ongoing compliance with the CIP Reliability Standards. The Commission's intent is to ensure that there is a clear line of authority and that cyber security functions are given the prominence they deserve. The Commission agrees with commenters that the senior manager, by virtue of his or her position, is not a user, owner or operator of the Bulk-Power System that is personally subject to civil penalties pursuant to section 215 of FPA.