

Consideration of Comments

Project Name:	2015-INT-01 Interpretation of CIP-002-5.1 for Energy Sector Security Consortium (EnergySec)
Comment Period Start Date:	7/27/2016
Comment Period End Date:	9/12/2016
Associated Ballots:	2015-INT-01 Interpretation of CIP-002-5.1 for Energy Sector Security Consortium (EnergySec) CIP-002-5.1 IN 1 INT

There were 18 sets of responses, including comments from approximately 49 different people from approximately 42 companies representing 8 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the [project page](#).

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Director of Standards Development, [Steve Noess](#) (via email) or at (404) 446-9691.

Questions

1. Do you agree with the response to Question 1? If not, please provide the basis for your disagreement and an alternate proposal.
2. Do you agree with the response to Question 2? If not please provide the basis for your disagreement and an alternate proposal.
3. Do you agree with the response to Question 3? If not please provide the basis for your disagreement and an alternate proposal.

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Duke Energy	Colby Bellville	1,3,5,6	FRCC,RF,SERC	Duke Energy	Doug Hils	Duke Energy	1	RF
					Lee Schuster	Duke Energy	3	FRCC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,10	NPCC	RSC	Paul Malozewski	Hydro One.	1	NPCC
					Guy Zito	Northeast Power Coordinating Council	NA - Not Applicable	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Wayne Sipperly	New York Power Authority	4	NPCC
					David Ramkalawan	Ontario Power Generation	4	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC

Bruce Metruck	New York Power Authority	6	NPCC
Alan Adamson	New York State Reliability Council	7	NPCC
Edward Bedder	Orange & Rockland Utilities	1	NPCC
David Burke	UI	3	NPCC
Michele Tondalo	UI	1	NPCC
Sylvain Clermont	Hydro Quebec	1	NPCC
Si Truc Phan	Hydro Quebec	2	NPCC
Helen Lainis	IESO	2	NPCC
Laura Mcleod	NB Power	1	NPCC
Brian Shanahan	National Grid	1	NPCC
Michael Jones	National Grid	3	NPCC
Michael Forte	Con Edison	1	NPCC
Quintin Lee	Eversource Energy	1	NPCC

					Kelly Silver	Con Edison	3	NPCC
					Peter Yost	Con Edison	4	NPCC
					Brian O'Boyle	Con Edison	5	NPCC
					Greg Campoli	NY-ISO	2	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC
					Silvia Parada Mitchell	NextEra Energy, LLC	4	NPCC
					Sean Bodkin	Dominion	4	NPCC
ACES Power Marketing	Warren Cross	1,3,5,6	MRO,RF,SERC,SPP RE,Texas RE,WECC	ACES Standards Collaborators	Brazos Electric Power Cooperative, Inc.	BREC	1,5	Texas RE
					Prairie Power, Inc.	PPI	1,3	SERC
					Arizona Electric Power Cooperative, Inc.	AEPC	1	WECC
					Hoosier Energy Rural Electric Cooperative, Inc.	HE	1	RF

					East Kentucky Power Cooperative	EKPC	1,3	SERC
					Sunflower Electric Power Corporation	SEPC	1	SPP RE
					Great River Energy	GRE	1,3,5,6	MRO

1. Do you agree with the response to Question 1? If not, please provide the basis for your disagreement and an alternate proposal.

Andrew Gallo - Austin Energy - 6

Answer No

Document Name

Comment

As Austin Energy (AE) understands the question, EnergySec is asking whether the entity must determine:

1. Whether each discrete BES Cyber System “could, within 15 minutes, adversely impact the reliable operation” of generation units aggregating to ≥ 1500 MW; *or*

2. Whether, collectively, groups of BES Cyber Systems at the generation facility “could, within 15 minutes, adversely impact the reliable operation” of generation units aggregating to ≥ 1500 MW.

The proposed response merely regurgitates the contents of the Background discussion regarding an entity’s freedom to group BES Cyber Assets into BES Cyber Systems, it does not answer the question of how to determine if BES Cyber Systems are *shared*.

AE *believes* the drafting team intended to say:

CIP-002-5.1 contains no *requirement* to *group* BES Cyber Systems. Accordingly, Responsible Entities may determine whether to consider BES Cyber Systems “shared.” Consequently, a Compliance Enforcement Authority has no basis for questioning a Responsible Entity’s conclusions regarding whether BES Cyber Systems are “shared” with respect to their ability to adversely impact the reliable operation of generation units aggregating to ≥ 1500 MW in a single Interconnection.

If AE has interpreted the proposed response correctly, the drafting team should clearly say so. If AE is not correct, the drafting team should rewrite the response to make it clearer.

Likes 0

Dislikes 0

Response: Thank you for your comments.

1. The IDT responded to the request for interpretation as submitted and reiterates that, consistent with the interpretation response to Question 2, the phrase “shared BES Cyber Systems” refers to discrete BES Cyber Systems that are shared by multiple generation units.”
2. The response to Question 2 further states quoting FAQ #49 “Shared BES Cyber Systems are those that are associated with any combination of units in a single interconnection, as referenced in CIP-002-5.1, Attachment 1, impact rating criteria 2.1 and 2.2.”
It is by analysis of the BES Cyber Systems impact, not simply entity discretion, that a determination of “shared” is reached.

Diana McMahon - Salt River Project - 1,3,5,6 - WECC

Answer	No
Document Name	
Comment	
SRP does not agree that the answer provided addresses the question. The question is not if an evaluation is to be done to determine if a BES Cyber system is shared. SRP understands the question to be asking whether the criterion should be performed on a discrete BES Cyber System shared by multiple generating units at a single plant location or on a collection of BES Cyber Systems shared by multiple generating units at a single plant location.	
Likes	0
Dislikes	0

Response: Thank you for your comment.

The IDT response clearly states that “in the standard language of CIP-002-5.1, there is no reference to or obligation to group BES Cyber Systems.”

John Hagen - Pacific Gas and Electric Company - 3

Answer	No
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Document Name	
Comment	
<p>Logical grouping of assets should be at the discretion of the entity and not a requirement</p> <p>However, this ambiguity may not be supported at audit</p>	
Likes	0
Dislikes	0
<p>Response: Thank you for your comments.</p> <p>The IDT agrees that the grouping of BES Cyber Assets is at the discretion of the Responsible Entity. This is supported by the discussion in the Background section of CIP-002-5.1 which states “it is left up to the Responsible Entity to determine the level of granularity at which to identify a BES Cyber System within the qualifications in the definition of BES Cyber System.” The discretion of grouping BES Cyber Assets into BES Cyber Systems was not questioned in the interpretation.</p>	
<p>Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb</p>	
Answer	No
Document Name	
Comment	
<p>We disagree that evaluation of each BES Cyber System needs to be performed individually for each discrete BES Cyber System. The question may be addressed by simply looking at the elements that comprise Criterion 2.1.</p> <p>The Elements of Criterion 2.1 are:</p> <p>Generation</p>	

- Commissioned generation
- A group [which we interpret as 1 or more] generating units
- The generating units are at a single plant location
- The generating units aggregate highest rated net Real Power capability of the preceding 12 calendar months equal to or exceed 1500 MW
- The 1500MW threshold is at a single Interconnection.

Relationship Between the Generation and the BES Cyber Systems

- The generating units share a BES Cyber System

The BES Cyber System

- The BES Cyber System can cause an adverse impact to the reliable operation of any combination of the generating units
- The adverse impact is within 15 minutes
- The aggregate adverse impact equals or exceeds 1500 MW
- The 1500MW adverse impact occurs at a single Interconnection.

In consideration of the criteria, if a single element is false / untrue, the BES Cyber System does not meet the threshold of a Medium Impact Risk. While we think that is straight forward, there is some nuance associated with the evaluation of a BES Cyber System, which is likely the genesis of the question.

The evaluation of a BES Cyber System.

The question asked for clarification of the term BES Cyber Systems, wanting to know if it means each individual and discrete BES Cyber System at a single plant location or collectively for groups of BES Cyber Systems.

We think clarification is found in Criterion 2.1 elements. For example, if there is a group of BES Cyber Systems and evaluation of the individual components determine the Criterion 2.1 thresholds are not met. At that point, it would be easy to say they are not a Medium Impact Risk. However, Criterion 2.1 language, paraphrased, is BES Cyber Systems that *could* adversely impact reliable operation of the generation units.

We feel the “could” qualifier brings into scope the relationship between and reliance upon the individual components of the group of BES Cyber Systems.

In other words:

If there is a failure in the interaction between two of the multiple BES Cyber Systems.

AND

The failure between the BES Cyber Systems “...within 15 minutes, adversely impact the reliable operation of any combination of units that in aggregate equal or exceed 1500 MW in a single Interconnection,”

AND

All other elements of Criterion 2.1 are met.

THEN

The threshold is pierced and the Medium Impact Risk is assigned.

It is Not Necessary to Evaluate Each Individual BES Cyber System

Based on the example, it may not be necessary to evaluate each individual BES Cyber System if the Criterion 2.1 threshold is breached on the potential failure of the interaction between two BES Cyber Systems.

We recognize the Criterion is specific to BES Cyber Systems and not the interaction between systems, but the “could” qualifier brings those interactions into scope of the evaluation regardless whether the individual BES Cyber System, alone, can cause the requisite adversity to reliability.

Resolution is Found in the Standard Revision Process

We believe the path to clarifying the ambiguous and uncertain language requires revision of Criterion 2.1 and the underlying Standard. The material revisions required to resolve the issues cannot be gained through the interpretation process.

Jointly-Owned Units Not Considered in Standard

Of additional concern are scenarios of jointly owned units (JOU) with BES Cyber Systems that communicate between entities and also meet Criterion 2.1. While contracts will delineate owners' responsibilities, it is common with JOU a level of parallel systems that, individually, "could" pierce the adverse reliability threshold.

Likes	0
Dislikes	0

Response: Thank you for your comments.

The IDT agrees with the comment that a single impact analysis may apply to the categorization of multiple BES Cyber Systems. For instance, if multiple BES Cyber Systems support a generation resource which totals only 500 MW in capability, then none of those BES Cyber Systems are associated with "commissioned generation...with an aggregate highest rated net Real Power capability of the preceding 12 calendar months equal to or exceeding 1500 MW in a single Interconnection." (CIP-002-5.1 Attachment 1, Criterion 2.1) However, the IDT asserts that the categorization of those individual BES Cyber Systems is still completed discretely, despite reliance on a single analysis of the total megawatt output capability of the generation resource.

Regarding the question of the interaction between two BES Cyber Systems, the determination of impact level is dependent upon the facts and circumstances surrounding the BES Cyber System in question. These facts and circumstances must be evaluated in the assessment to determine the impact level of the BES Cyber System. It is outside the scope of an interpretation to determine or assess the facts and circumstances for a specific scenario.

Consistent with the response to the interpretation and the obligations outlined in CIP-002-5.1, a Responsible Entity must evaluate criterion 2.1 in the context of shared BES Cyber Systems. "The phrase 'shared BES Cyber Systems' refers to discrete BES Cyber Systems that are shared by multiple generation units." (EnergySec CIP-002-5.1 Interpretation Response, Question 2)

Regarding the question of jointly-owned units, that issue was not the subject of the interpretation request. A separate Request for interpretation (RFI) or Standard Authorization Revision (SAR) may be submitted to raise the questions of jointly-owned units.

Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6	
Answer	No
Document Name	
Comment	
<p>1. Initial ballot for CIP-003-7 - Cyber Security – Security Management Controls</p> <p>Vote: No</p> <p>Comments: PacifiCorp supports comments submitted by Edison Electric Institute. Also, while PacifiCorp understands the justification provided for the approach the SDT took, PacifiCorp believes that the approach adds an increased compliance burden without added benefit to the security of BES, or any assurance that entities will not be asked for a list of BES Cyber Assets at Low Impact BES Assets.</p>	
Likes	0
Dislikes	0
<p>Response: Thank you for your comments.</p> <p>The IDT noticed that these comments are the same as those submitted for Project 2016-02 LERC posting and they are responsive to that proposal. The SDT will address the concerns in response to the initial LERC posting rather than for the EnergySec Interpretation of CIP-002-5.1.</p>	
Patrick Farrell - Edison International - Southern California Edison Company - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	

SCE agrees that a BES Cyber System that is shared between multiple generators needs to be evaluated individually, as opposed to being collectively grouped. Furthermore, SCE agrees that there is no obligation to group BES Cyber Systems. Each entity is given the choice of granularity in grouping BES Cyber Assets into BES Cyber Systems, but is not required to group BES Cyber Systems.

Likes 0

Dislikes 0

Response: Thank you for your comments.

Jaclyn Massey - Entergy - Entergy Services, Inc. - 5

Answer Yes

Document Name

Comment

No additional comment

Likes 0

Dislikes 0

Response: Thank you for your comment.

Warren Cross - ACES Power Marketing - 1,3,5,6 - MRO,WECC,Texas RE,SERC,SPP RE,RF, Group Name ACES Standards Collaborators

Answer Yes

Document Name

Comment

We support the interpretation. It is our belief that NERC and the regions continue to focus on the Registered Entity’s ability to self-determine BES Cyber Systems and shared BES Cyber Systems. We support the direction to the guidance in the background section of CIP-002-5.1 that states:

“it is left up to the Responsible Entity to determine the level of granularity at which to identify a BES Cyber System within the qualifications in the definition of BES Cyber System”.

Likes 0

Dislikes 0

Response: Thank you for your comments.

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,10 - NPCC, Group Name RSC

Answer Yes

Document Name

Comment

We agree with the response to Question 1.

Likes 0

Dislikes 0

Response: Thank you for your comment.

Leonard Kula - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

Likes 0	
Dislikes 0	
Response	
Michelle Amarantos - APS - Arizona Public Service Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Joe Tarantino - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Bob Reynolds - Southwest Power Pool Regional Entity - 10

Answer Yes

Document Name

Comment

Likes 0	
Dislikes 0	
Response	
Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Wesley Maurer - Lower Colorado River Authority - 1,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Erika Doot - U.S. Bureau of Reclamation - 5	

Answer	
Document Name	
Comment	
Reclamation believes that examples would be helpful for understanding the scope of EnergySec's request and the NERC response.	
Likes 0	
Dislikes 0	
<p>Response: Thank you for your comment.</p> <p>No such examples were submitted to the IDT as part of the request for interpretation and the IDT is limited from discussing specific compliance approaches. Other venues exist to explore applicable examples such as NERC's Implementation Guidance process.</p>	

2. Do you agree with the response to Question 2? If not please provide the basis for your disagreement and an alternate proposal.

Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6

Answer No

Document Name

Comment

2. Initial ballot for CIP-003-7 Implementation Plan

Vote: No

Comments: PacifiCorp supports comments submitted by Edison Electric Institute. Also, the language in the definitions and CIP-003-7 currently out for vote is a substantial rewrite of the requirements as approved by FERC. PacifiCorp cannot afford to wait to begin implementation until a revised standard is approved by FERC, meaning that any approved version that does not allow PacifiCorp to leverage work efforts already completed in alignment with the current FERC approved standard would lead to duplicative effort and costs. Any attempt to compress the overall timeline for implementation could result in a negative impact to the reliability of the bulk electric system

Likes 0

Dislikes 0

Response: Thank you for your comments.

The IDT noticed that these comments are the same as those submitted for Project 2016-02 LERC posting and they are responsive to that proposal. The SDT will address the concerns in response to the initial LERC posting rather than for the EnergySec Interpretation of CIP-002-5.1.

Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb

Answer No

Document Name	
Comment	
<p>We incorporate our response to Question No. 1.</p> <p>The object of “those,” like at, “...are those shared...” may seem ambiguous, but the plain reading of the sentence in context illustrates “those” refers to generating units. Substituting “generating units” for “those,” the sentence reads:</p> <p>“For each group of generating units, the only BES Cyber Systems that meet this criterion are generating units shared BES Cyber Systems that could, within 15 minutes...”</p> <p>This supports the SDT’s proposed interpretation—that all the generating units share the discrete BES Cyber Systems. However, as discussed in our response to Question 1, we believe the path to clarifying the ambiguous and uncertain language requires revision of Criterion 2.1 and the underlying Standard. The material revisions required to resolve the issues cannot be gained through the interpretation process.</p>	
Likes	0
Dislikes	0
Response Thank you for your comment.	
<p>The IDT disagrees that “those” refers to generating units; and asserts that “those” refers to “shared BES Cyber Systems.” (CIP-002-5.1 Attachment 1, Criterion 2.1)</p> <p>The IDT disagrees that modification of CIP-002-5.1 Attachment 1, Criterion 2.1 is necessary.</p>	
Warren Cross - ACES Power Marketing - 1,3,5,6 - MRO,WECC,Texas RE,SERC,SPP RE,RF, Group Name ACES Standards Collaborators	
Answer	Yes
Document Name	
Comment	

No comments.

Likes 0

Dislikes 0

Response

Jaclyn Massey - Entergy - Entergy Services, Inc. - 5

Answer Yes

Document Name

Comment

No additional comment.

Likes 0

Dislikes 0

Response

John Hagen - Pacific Gas and Electric Company - 3

Answer Yes

Document Name

Comment

However, this does not resolve the question of what is "discreet"

Likes 0

Dislikes 0

Response: Thank you for your comments.

Question 2 asks “whether the phrase ‘shared BES Cyber Systems’ refers to discrete BES Cyber Systems that are shared by multiple units, or groups of BES Cyber Systems that could collectively impact multiple units.” The IDT responded that “the phrase ‘shared BES Cyber Systems’ refers to discrete BES Cyber Systems that are shared by multiple generation units.”

The definition of “discrete” was not raised in this interpretation and the IDT contends that the meaning of “discrete” is clear in this context.

Patrick Farrell - Edison International - Southern California Edison Company - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

SCE agrees that the phrase "shared BES Cyber Systems" applies to discrete BES Cyber Systems shared by multiple generators within a generation facility. SCE notes that this term was clarified in the NERC Frequently Asked Questions (FAQ) No. 49.

Likes 0

Dislikes 0

Response: Thank you for your comments.

Wesley Maurer - Lower Colorado River Authority - 1,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,10 - NPCC, Group Name RSC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Bob Reynolds - Southwest Power Pool Regional Entity - 10

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joe Tarantino - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amaranos - APS - Arizona Public Service Co. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Diana McMahon - Salt River Project - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrew Gallo - Austin Energy - 6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Erika Doot - U.S. Bureau of Reclamation - 5

Answer

Document Name

Comment

Reclamation believes that examples would be helpful for understanding the scope of EnergySec's request and the NERC response.

Likes 0

Dislikes 0

Response: Thank you for your comments.

No such examples were submitted to the IDT as part of the request for interpretation and the IDT is limited from discussing specific compliance approaches. Other venues exist to explore applicable examples such as NERC's Implementation Guidance process.

3. Do you agree with the response to Question 3? If not please provide the basis for your disagreement and an alternate proposal.

Andrew Gallo - Austin Energy - 6

Answer No

Document Name

Comment

In response to Question #2, the drafting team determined, “The phrase ‘shared BES Cyber Systems’ refers to discrete BES Cyber Systems...*shared by multiple generation units.*” (emphasis added)

Accordingly, Question #3 seeks guidance regarding how to determine if BES Cyber Systems are “shared” by generation units so as to fall into Criterion 2.1. The proposed response does not do so. Again, AE *believes* the drafting team intended to say:

CIP-002-5.1 contains no guidance regarding how to *group* BES Cyber Systems to determine their impact on generation units aggregating & 1500 MW. Accordingly, Responsible Entities have discretion regarding whether or how to “group” BES Cyber Systems. Consequently, a Compliance Enforcement Authority has no basis for questioning a Responsible Entity’s conclusions regarding whether or how to group BES Cyber Systems with respect to their ability to adversely impact the reliable operation of generation units aggregating to & 1500 MW in a single Interconnection.

If AE has interpreted the proposed response correctly, the drafting team should clearly make that statement. If AE is not correct, the drafting team should rewrite the response to make it clearer.

Likes 0

Dislikes 0

Response: Thank you for your comments.

As written, Question 3 asks specifically about the grouping of shared BES Cyber Systems. The IDT responded that “the phrase [shared BES Cyber Systems] applies to each discrete BES Cyber System.”

Additionally, please see the IDT response to Austin Energy’s comments in Question 1.

John Hagen - Pacific Gas and Electric Company - 3	
Answer	No
Document Name	
Comment	
What is the definition of "discreet"? What attributes make a system discreet?	
Likes 0	
Dislikes 0	
Response: Thank you for your comment. The definition of "discrete" was not raised in this interpretation.	
Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb	
Answer	No
Document Name	
Comment	
We incorporate our response to Question No. 1 and its proposed path forward.	
Likes 0	
Dislikes 0	
Response: Thank you for your comment.	

Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6	
Answer	No
Document Name	
Comment	
<p>3. Initial ballot for the new term - Low Impact External Routable Communication (LERC) and its definition</p> <p>Vote: No</p> <p>Comments: PacifiCorp supports comments submitted by Edison Electric Institute. Also, while PacifiCorp understands the justification provided for the approach the SDT took, PacifiCorp believes that the approach adds an increased compliance burden without added benefit to the security of BES, or any assurance that entities will not be asked for a list of BES Cyber Assets at Low Impact BES Assets</p>	
Likes	0
Dislikes	0
<p>Response: Thank you for your comment.</p> <p>The IDT noticed that these comments are the same as those submitted for Project 2016-02 LERC posting and they are responsive to that proposal. The SDT will address the concerns in response to the initial LERC posting rather than for the EnergySec Interpretation of CIP-002-5.1.</p>	
Patrick Farrell - Edison International - Southern California Edison Company - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
<p>SCE agrees that the phrase applies to each discrete BES Cyber System, rather than collectively to groups of BES Cyber Systems.</p>	

Likes	0
Dislikes	0
Response: Thank you for your comment.	
Jaclyn Massey - Entergy - Entergy Services, Inc. - 5	
Answer	Yes
Document Name	
Comment	
No additional comment.	
Likes	0
Dislikes	0
Response	
Warren Cross - ACES Power Marketing - 1,3,5,6 - MRO,WECC,Texas RE,SERC,SPP RE,RF, Group Name ACES Standards Collaborators	
Answer	Yes
Document Name	
Comment	
<p>ACES supports that the phrase applies to each discrete BES Cyber Systems.</p> <p>While we understand the RFI was limited to "shared," we would like the interpretation team to consider issuing guidance on jointly-owned BES Cyber Systems regarding where and how responsibility, compliance and auditability applies to each owner.</p>	

Likes	0
Dislikes	0
Response: Thank you for your comment. Regarding the question of jointly-owned units, that issue was not the subject of the interpretation request. A separate Request for interpretation (RFI) or Standard Authorization Revision (SAR) may be submitted to raise the questions of jointly-owned units.	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Diana McMahon - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Michelle Amarantos - APS - Arizona Public Service Co. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes	0
Dislikes	0
Response	
Joe Tarantino - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Bob Reynolds - Southwest Power Pool Regional Entity - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,10 - NPCC, Group Name RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Wesley Maurer - Lower Colorado River Authority - 1,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Erika Doot - U.S. Bureau of Reclamation - 5

Answer

Document Name

Comment

Reclamation believes that examples would be helpful for understanding the scope of EnergySec's request and the NERC response.

Likes 0

Dislikes 0

Response: Thank you for your comments.

No such examples were submitted to the IDT as part of the request for interpretation and the IDT is limited from discussing specific compliance approaches. Other venues exist to explore applicable examples such as NERC's Implementation Guidance process.