

Official Comment Form for Project 2008-14 — Cyber Security Violation Severity Levels (CIP Version 1 VSLs and SAR revision) and Project 2008-06 — Cyber Security Order 706 (CIP Version 2 VSLs and VRFs)

Please use this form to submit comments on the proposed Violation Severity Levels (VSLs) for Versions 1 and 2 of the CIP-002 through CIP-009 standards, proposed Violation Risk Factors (VRFs) for Version 2 of CIP-003 and CIP-006, and a proposed change to the SAR for Project 2008-14.

Comments must be submitted by April 20, 2009. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "Cyber Security VRF and VSL Comment Form" in the subject line. If you have any questions on the subject information please contact Al Calafiore at Al.Calafiore@nerc.net or David Taylor at David.Taylor@nerc.net.

Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 – RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 – Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 – Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 – Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 – Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 – Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 – Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 – Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 – Regional Reliability Organizations and Regional Entities

Comment Form for Project 2008-14 — Cyber Security Violation Severity Levels (CIP Version 1 VSLs) and Project 2008-06 — Cyber Security Order 706 (CIP Version 2 VRFs and VSLs)

Group Comments (Complete this page if comments are from a group.)

Group Name: MRO NERC Standards Review Subcommittee

Lead Contact: Michael Brytowski

Contact Organization: MRO

Contact Segment: 10

Contact Telephone: 651-855-1728

Contact E-mail: mj.brytowski@midwestreliability.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Carol Gerou	MP	MRO	1,3,5,6
Neal Balu	WPS	MRO	3,4,5,6
Terry Bilke	MISO	MRO	2
Joe DePoorter	MGE	MRO	3,4,5,6
Ken Goldsmith	ALTW	MRO	4
Jim Haigh	WAPA	MRO	1,6
Terry Harbour	MEC	MRO	1,3,5,6
Joseph Knight	GRE	MRO	1,3,5,6
Scott Nickels	RPU	MRO	3,4,5,6
Dave Rudolph	BEPC	MRO	1,3,5,6
Eric Ruskamp	LES	MRO	1,3,5,6
Pam Sordet	XCEL	MRO	1,3,5,6

Comment Form for Project 2008-14 — Cyber Security Violation Severity Levels (CIP Version 1 VSLs) and Project 2008-06 — Cyber Security Order 706 (CIP Version 2 VRFs and VSLs)

***If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.**

Project 2008-06 Project Web site:

http://www.nerc.com/filez/standards/Project_2008-06_Cyber_Security.html

Project 2008-14 Project Web site:

http://www.nerc.com/filez/standards/Project2008-14_Cyber_Security_VSLDT.html

Background Information:

The Federal Energy Regulatory Commission (FERC) in Order 706 (Mandatory Reliability Standards for Critical Infrastructure Protection — Issued January 18, 2008) approved eight version 1 Critical Infrastructure Protection (CIP) reliability standards and directed NERC to develop modifications to the CIP Reliability Standards CIP-002 thru CIP-009 to address specific concerns. Included in the directives of Order 706 was a directive for NERC to file Violation Severity Levels for reliability standards CIP-002 thru CIP-009 before compliance audits begin on July 1, 2009.

The standards CIP-002 thru CIP-009 were originally filed with "Levels of Non-Compliance" instead of "Violation Severity Levels." This is consistent with the Order on Compliance Filing dated June 7, 2007 (Docket #RR06-1-007), which directed NERC to replace the 'Levels of Non-compliance' in the 83 regulatory-approved standards with 'Violation Severity Levels' which also required development of Violation Severity Levels for any new or revised standards.

The drafting team for Project 2008-14 Cyber Security Violation Severity Levels was tasked with drafting proposed VSLs to comply the FERC directives regarding the development of Violation Severity Levels for the version 1 cyber group of standards:

- CIP-002-1 — Cyber Security — Critical Cyber Asset Identification
- CIP-003-1 — Cyber Security — Security Management Controls
- CIP-004-1 — Cyber Security — Personnel and Training
- CIP-005-1 — Cyber Security — Electronic Security Perimeter(s)
- CIP-006-1 — Cyber Security — Physical Security
- CIP-007-1 — Cyber Security — Systems Security Management
- CIP-008-1 — Cyber Security — Incident Reporting and Response Planning
- CIP-009-1 — Cyber Security — Recovery Plans for Critical Cyber Assets

The drafting team for Project 2008-14 is proposing a change to the scope of its SAR to include responsibility for developing the VSLs for Project 2008-06 and is seeking feedback on this proposal.

Comment Form for Project 2008-14 — Cyber Security Violation Severity Levels (CIP Version 1 VSLs) and Project 2008-06 — Cyber Security Order 706 (CIP Version 2 VRFs and VSLs)

In a separate action, the standard drafting team (SDT) for Project 2008-06 Cyber Security Order 706 was tasked with revising each of the version 1 cyber security standards to ensure that they conform to the latest version of the ERO Rules of Procedure, and to address the directives identified in FERC Order 706 and the issues identified by industry stakeholders. The SDT for Project 2008-06 Cyber Security Order 706 agreed that due to the extensive scope and varying complexity of the issues and the work involved in making these revisions to the cyber security standards, a multiphase approach for revising this set of standards was needed and was therefore adopted.

Phase 1 of Project 2008-06 Cyber Security Order 706 includes the necessary modifications to the version 1 cyber security standards (CIP-002-1 through CIP-009-1) to comply with the near term specific directives included in FERC Order 706 and 706A. As part of the initial phase of this project, the SDT has posted the version 2 CIP-002-2 through CIP-009-2 standards for industry comment and pre-ballot review absent the version 2 VRFs and VSLs.

The drafting teams for both Project 2008-06 Cyber Security Order 706 and Project 2008-14 Cyber Security Violation Severity Levels are now posting proposed VSLs for industry comment and the team working on the version 2 standards is also posting proposed VRFs.

- The drafting team for Project 2008-14 Cyber Security Violation Severity Levels is posting proposed VSLs for the version 1 CIP-002-1 thru CIP-009-1 standards, and a proposed revision to its SAR.
- The standard drafting team for Project 2008-06 Cyber Security Order 706 is posting **both** proposed VRFs and proposed VSLs for the version 2 CIP-002-2 thru CIP-009-2 standards.

The version 1 VSLs are a comprehensive set of VSLs for every requirement of the version 1 CIP-002-1 thru CIP-009-1 standards as directed in FERC Order 706. However, the version 2 VSLs only include proposed modifications to the version 1 VSLs to be consistent with the changes proposed in the version 2 CIP-002-2 thru CIP-009-2 standards as posted for industry pre-ballot review commencing March 3, 2009. The team is only posting version 2 VRFs for the two standards (CIP-003-2 and CIP-006-2) where the team added new VRFs, and for these two standards, the team is only seeking comment on the 15 version 2 VRFs that are "new". These "new" VRFs are clearly identified in the posted document.

With this comment form, stakeholders are being asked to comment on four separate items:

- (1) the complete set of version 1 VSLs
- (2) the incremental changes to the version 1 VSLs proposed to create the version 2 VSLs
 - All comments submitted on the version 1 VSLs will automatically apply to the version 2 VSLs and therefore need not be repeated relative to the version 2 VSLs. Any changes made to the version 1 VSLs as a result of comments received from industry will automatically be applied to the version 2 VSLs.
- (3) the 15 "new" version 2 VRFs proposed for CIP-003-2 and CIP-006-2
- (4) the acceptability of the proposal to have one drafting team develop all the VSLs for both the version 1 and later versions of the CIP standards

The version 2 VRFs, and version 1 and version 2 VSLs in the accompanying documents are organized numerically by standard and requirement number.

Comment Form for Project 2008-14 — Cyber Security Violation Severity Levels (CIP Version 1 VSLs) and Project 2008-06 — Cyber Security Order 706 (CIP Version 2 VRFs and VSLs)

The drafting teams for both Project 2008-06 Cyber Security Order 706 and Project 2008-14 Cyber Security Violation Severity Levels are requesting industry comments on the proposed VRFs and VSLs. Accordingly, we request that you complete and submit this form to Lauren Koller by **April 20, 2009**.

***Note:**

If you need to add a row to the table below please select Table from the above toolbar than Insert "Row Above" or "Row Below"

Comment Form for Project 2008-14 — Cyber Security Violation Severity Levels (CIP Version 1 VSLs) and Project 2008-06 — Cyber Security Order 706 (CIP Version 2 VRFs and VSLs)

Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language

Comment Form for Project 2008-14 — Cyber Security Violation Severity Levels (CIP Version 1 VSLs) and Project 2008-06 — Cyber Security Order 706 (CIP Version 2 VRFs and VSLs)

Standard Number	Requirement Number	Alternate Incremental Lower VSL Language	Alternate Incremental Moderate VSL Language	Alternate Incremental High VSL Language	Alternate Incremental Severe VSL Language

Comment Form for Project 2008-14 — Cyber Security Violation Severity Levels (CIP Version 1 VSLs) and Project 2008-06 — Cyber Security Order 706 (CIP Version 2 VRFs and VSLs)

- 3. Do you agree with the VRFs proposed for the version 2 CIP standards? If not, please identify which VRFs you disagree with and identify why.**

Agree

Disagree

Comments:

- 4. If there any other comments you wish to provide (relative to the VSLs for CIP-002-1 through CIP-009-1) to the drafting team for Project 2008-14 Cyber Security Violation Severity Levels (version 1 VSLs) that you have not already provided in responses to the questions above, please provide them here.**

Comments:

- 5. The drafting team assigned to develop the V1 VSLs has proposed expanding the scope of its SAR to also include development of VSLs for the Cyber 706 SDT. Do you agree with the proposed expansion in the scope of the SAR for V1 Cyber Security VSLs?**

Agree

Disagree

Comments:

- 6. If there any other comments you wish to provide (relative to the VSLs for CIP-002-2 through CIP-009-2) to the standard drafting team for Project 2008-06 Cyber Security Order 706 (version 2 VSLs) that you have not already provided in responses to the questions above, please provide them here.**

Comments: