

CAN Comment Form Compliance Application Notice – 0024

Please complete the CAN Comment Form and email it to cancomments@nerc.net.

Commenter Information

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Entity Represented: MRO NSRF represented by: Madison Gas and Electric Company, Alliant Energy, Western Area Power Administration, Great River Energy, Xcel Energy, Rochester Public Utilities, Basin Electric Power Cooperative, Lincoln Electric System, American transmission Company, Wisconsin Public Service, Omaha Public Power District, Minnkota Power Cooperative, Midwest ISO, Otter Tail Power Company, Muscatine Power and Water, Nebraska Public Power District

Region: MRO

Primary Interest Groups

Are you suggesting a change to the groups mentioned? No

If yes, explain what change and why:

Issue

Are you suggesting a change to the issue statement of the CAN? No

If yes, explain what change and why:

Background

Are you suggesting a change to the background statement of the CAN? No

If yes, explain what change and why:

Compliance Application

Are you suggesting a change to the compliance application section of the CAN? Yes

If yes, explain what change and why:

Page 2, paragraph 4 states (emphasis added):

“Since data diode devices can only transmit data in a single direction, normal flow control that is typically handled by the TCP layer in a TCP/IP network cannot be accomplished. The sending Cyber Asset cannot guarantee that the receiving Cyber Asset has received the data. *If the data is relied upon for essential functions such as control systems, this lack of communication status feedback may be unacceptable.*”

NSRF believes this is a statement of opinion and an engineering design or operational decision is best left to the entity. Similar language can be found on Page 2, paragraph 5. Again, judgment should be left to the entity based on their specific use-case.

“Similarly, most control systems require not only the transmission of data, but also the receipt of data requests and control commands. A data diode device implemented in a write-only direction as an ESP access control point will not allow data requests, control commands, communication status feedback or set points from external supervisory systems such as SCADA systems.”

Effective Period for CAN

Are you suggesting a change to the effective period of the CAN? **Yes**

If yes, explain what change and why: Obviously this is an issue for some entities – a 12 month implementation of this standard interpretation should be provided to allow affected entities sufficient time install a perimeter security device.

Evidence of Compliance

Are you suggesting a change to the evidence of compliance mentioned in the CAN? **No**

If yes, explain what change and why: