

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**Revised Critical Infrastructure Protection Reliability Standards** )  
 ) **Docket No. RM15-14-000**

**COMMENTS IN SUPPORT OF THE TRADE ASSOCIATIONS MOTION FOR AN  
EXTENSION OF TIME AND IN RESPONSE TO COMMENTS OF THE NORTH  
AMERICAN ELECTRIC RELIABILITY CORPORATION**

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The California Independent System Operator Corporation (CAISO), Electric Reliability Council of Texas, Inc. (ERCOT), Midcontinent Independent System Operator, Inc. (MISO), PJM Interconnection, L.L.C. (PJM), and Southwest Power Pool, Inc. (SPP) (collectively referred to as the Joint Commenters) provide these comments for two purposes:

- To support the Trade Associations<sup>1</sup> motion for an extension, submitted on February 4, 2016; and
- To respond to comments submitted by the North American Electric Reliability Corporation (“NERC”) on February 8, 2016.

Specifically, the Joint Commenters support the Trade Associations’ motion for an extension of time to defer implementation of Critical Infrastructure Protection (“CIP”) Version 5 Reliability Standards from April 1, 2016, to July 1, 2016. While the Joint Commenters are very appreciative of NERC’s recommendations regarding deference on enforcement of certain language, the Joint Commenters respectfully suggest that the requested extension provides the most clarity and direction for the affected parties. Therefore, the Joint Commenters respectfully request that the Federal Energy Regulatory Commission (“FERC” or “Commission”) grant the extension.

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<sup>1</sup> The Trade Associations consist of the Edison Electric Institute, the American Public Power Association, Electricity Consumers Resource Council, Electric Power Supply Association, Large Public Power Council, National Rural Electric Cooperative Association, and Transmission Access Policy Study Group.

In their February 4, 2016, Motion for Extension, the Trade Associations request that the Commission grant an extension of time to defer implementation of CIP Version 5 Reliability Standards from April 1, 2016, to July 1, 2016, to align with the effective date for seven CIP Version 6 Reliability Standards. The Trade Associations note that the Responsible Entities responsible for implementation of CIP Reliability Standards will need to maintain two sets of processes and procedures to ensure compliance, resulting in an “increase in administrative burdens with no tangible benefits to security or bulk power system reliability.”<sup>2</sup> While not all parties may be subject to the same constraint, the Joint Commenters agree with the Trade Associations and the Commission should not impose such costs on those parties that do face these constraints unnecessarily.

Therefore, the Joint Commenters respectfully request that the Commission defers implementation of CIP Version 5 Reliability Standards from April 1, 2016 to July 1, 2016 to align with the effective date for the CIP Order No. 822 Reliability Standards, and respectfully requests that the Commission grants the extension as soon as possible to assist with transition efforts for the Joint Commenters and their respective members. Approving this small extension will alleviate administrative burdens for many Responsible Entities.

Respectfully submitted,

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/s/ Chad V. Seely

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<sup>2</sup> *Motion for an Extension of Time and Request for Shortened Comment Period and Expedited Action of the Edison Electric Institute, the American Public Power Association, Electricity Consumers Resource Council, Electric Power Supply Association, Large Public Power Council, National Rural Electric Cooperative Association, and Transmission Access Policy Study Group*, Docket No. RM15-14-000 (Feb. 4, 2016).

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*\*Designated to receive service*

Dated: February 12, 2016

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding. Dated at Carmel, Indiana, this 12th day of February, 2016.

/s/ Julie Bunn

Julie Bunn

Midcontinent Independent System Operator, Inc.

Document Content(s)

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