

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

Critical Infrastructure Protection	)	Docket No. RM24-7
Reliability Standard CIP-015-1 – Cyber	)	
Security – Internal Network Security	)	
Monitoring	)	

COMMENTS OF THE ISO/RTO COUNCIL

Pursuant to the Federal Energy Regulatory Commission’s (“FERC” or the “Commission”) September 19, 2024 Notice of Proposed Rulemaking, the ISO/RTO Council (“IRC”)¹ hereby submits these comments in the above-captioned proceeding.² In its Notice of Proposed Rulemaking, the Commission proposes to approve proposed Reliability Standard CIP-015-1 (Cyber Security – Internal Network Security Monitoring).³ As described by the Commission, the proposed Reliability Standard requires responsible entities to implement Internal Network Security Monitoring within the electronic security perimeter for all high impact Bulk Electric System Cyber Systems with and without external routable connectivity and medium impact Bulk Electric System Cyber Systems with external routable connectivity.

¹ The IRC comprises the following independent system operators (“ISOs”) and regional transmission organization (“RTOs”): Alberta Electric System Operator (“AESO”); California Independent System Operator Corporation (“CAISO”); Electric Reliability Council of Texas, Inc. (“ERCOT”); the Independent Electricity System Operator (“IESO”) of Ontario; ISO New England Inc. (“ISO-NE”); Midcontinent Independent System Operator, Inc. (“MISO”); New York Independent System Operator, Inc. (“NYISO”); PJM Interconnection, L.L.C. (“PJM”); and Southwest Power Pool, Inc. (“SPP”). AESO does not join these comments.

² 18 C.F.R. §§ 385.212, 385.213.

³ *Petition of North American Electric Reliability Corporation (NERC) for Approval of Proposed Reliability Standard CIP-015-1 (Cyber Security - Internal Network Security Monitoring)*, Docket No. RM24-7-000 (June 24, 2024).

The Notice of Proposed Rulemaking determines that NERC's proposed application of the term "CIP-networked environment" as limited to assets and systems within the electronic security perimeter is overly narrow. As such, the Commission proposes to direct NERC to develop modifications to proposed Reliability Standard CIP-015-1 that extend Internal Network Security Monitoring to a responsible entity's Electronic Access Control or Monitoring System and Physical Access Control System outside of a responsible entity's Electronic Security Perimeter.

Throughout the Notice of Proposed Rulemaking, the Commission refers to the concept of a "CIP-networked environment." To avoid any ambiguity, the IRC recommends that the Commission clarify this concept in any final rule by specifying the networks located outside of a responsible entity's Electronic Security Perimeter that would be covered by the requirements of a revised CIP-015 Reliability Standard. In this respect, the Commission should replace its proposed directive to NERC in the Notice of Proposed Rulemaking with a directive to develop modifications to proposed Reliability Standard CIP-015-1 that extend Internal Network Security Monitoring **to networks on which** Electronic Access Control or Monitoring Systems and Physical Access Control Systems reside outside of a responsible entity's Electronic Security Perimeter. The Commission should also clarify that any such directive requires no changes to the CIP-015-1 approach of directing responsible entities to use a risk-based rationale to implement network activity monitoring inside or outside an Electronic Security Perimeter.

The IRC respectfully requests that the Commission consider these comments in contemplating the adoption of any final rule in this proceeding.

Respectfully submitted,

/s/ Margo Caley

Maria Gulluni
Vice President & General Counsel
Margo Caley
Chief Regulatory Compliance Counsel
ISO New England Inc.
One Sullivan Road
Holyoke, Massachusetts 01040
mcaley@iso-ne.com

/s/ Andrew Ulmer

Roger E. Collanton
General Counsel
Andrew Ulmer
Assistant General Counsel
California Independent System Operator Corporation
250 Outcropping Way
Folsom, California 95630
aulmer@caiso.com

/s/ Michael Kessler

Michael Kessler
Managing Assistant General Counsel
Midcontinent Independent System Operator, Inc.
720 City Center Drive
Carmel, Indiana 46032
Telephone: (317) 249-5400
Fax: (317) 249-5912
mkessler@misoenergy.org

/s/ Craig Glazer

Craig Glazer
Vice President-Federal Government Policy
Thomas DeVita
Associate General Counsel
PJM Interconnection, L.L.C.
2750 Monroe Blvd.
Audubon, PA 19403
Ph: (610) 666-8248
Fax: (610) 666-8211
craig.glazer@pjm.com
thomas.devita@pjm.com

/s/ Raymond Stalter

Robert E. Fernandez
Executive Vice President and General Counsel
Raymond Stalter
Director of Regulatory Affairs
New York Independent System Operator, Inc.
10 Krey Boulevard
Rensselaer, NY 12144
rstalter@nyiso.com

/s/ Paul Suskie

Paul Suskie
Executive Vice President & General Counsel
Southwest Power Pool, Inc.
201 Worthen Drive
Little Rock, Arkansas 72223-4936
psuskie@spp.org

/s/ Chad V. Seely

Chad V. Seely

Senior Vice President & General Counsel

Nathan Bigbee

Deputy General Counsel

Kennedy R. Meier

Regulatory Counsel

Electric Reliability Council of Texas, Inc.

8000 Metropolis Drive, Bldg. E, Suite 100

Austin, Texas 78744

chad.seely@ercot.com

/s/ Carrie Aloussis

Carrie Aloussis

Senior Manager, Regulatory Affairs

Independent Electricity System Operator

1600-120 Adelaide Street West

Toronto, Ontario M5H 1T1

carrie.aloussis@ieso.ca

[Carrie Aloussis@ieso.ca](mailto:Carrie.Aloussis@ieso.ca)

November 26, 2024

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the above-referenced proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California, this 26th day of November 2024.

/s/ Ariana Rebancos

Ariana Rebancos