

#	Organization	Commentor	Type	Page #	Line #	Section	Comment (Include rationale for comment)	Suggested change
1	Xcel Energy	Elizabeth Mairs	T	9	328	2.4	Is the 'desired Tier' for the company as a whole or each Category, Subcategory, activity? This needs to be clarified here	'determine the desired Tier for [the organization] [the category] [the activity]'
2	Xcel Energy	Elizabeth Mairs	T	11	412	3.2	Need to define scope = assets supporting critical infrastructure. Otherwise organizations may be expected to protect all assets similarly, resulting in poor allocation of resources	Edit the sentence to read: 'The organization identifies its critical infrastructure function(s), related systems and assets...'
3	Xcel Energy	Elizabeth Mairs	T	13		AM	Category description focuses on business objectives rather than on critical infrastructure	'...and facilities upon which the critical infrastructure is dependent.'
4	Xcel Energy	Elizabeth Mairs	E	14		ID.BE-1	Subcategory description has extra 'and'	'...role in the supply chain is identified...'
5	Xcel Energy	Elizabeth Mairs	T	15		RA	Needs to focus on CI not general business risks	The organization understands the cybersecurity risk to CI of organizational operations, organizational assets, and individuals.'
6	Xcel Energy	Elizabeth Mairs	T	15		ID-RA-0	[new item] assessment needs to include determination of key systems and assets supporting CI functions	The organization identifies systems and assets supporting Critical Infrastructure
7	Xcel Energy	Elizabeth Mairs	T	15		ID-RA-1	Needs to be specific to those assets potentially impacting CI functions	'Vulnerabilities to systems and assets supporting critical infrastructure are identified and documented.'
8	Xcel Energy	Elizabeth Mairs	T	16		AC	Needs to allow different controls for different risk levels associated w/different CI devices & facilities	'Access to information and facilities associated with Critical Infrastructure are limited consistent with the organization's risk strategy, to authorized users, processes or devices...'
9	Xcel Energy	Elizabeth Mairs		18		DS	Needs to focus on CI not general business risks	...managed consistent with the organization's risk strategy for CI...'
10	Xcel Energy	Elizabeth Mairs	T	19		IP	Description exceeds what is typically considered 'information protection' (which the DS section covers) and gets into SDLC and systems management	Retitle the Section 'Systems Management'
11	Xcel Energy	Elizabeth Mairs		20		IP	Category description needs to focus on CI	'...used to manage protection of information systems and assets supporting CI functions.'

12	Xcel Energy	Elizabeth Mairs	T	20		PR.IP-5	Subcategory description should not reference 'regulations' as this is not a regulatory framework	Replace with 'requirements' or 'procedures'
13	Xcel Energy	Elizabeth Mairs	T	21		MA	Category description needs to factor in different controls for different risk levels of CI assets	'...is performed consistent with the organization's risk strategy for CI.'
14	Xcel Energy	Elizabeth Mairs	T	21		PT	Category description needs to factor in different controls for different risk levels of CI assets	'...consistent with the organization's risk strategy for CI.'
15	Xcel Energy	Elizabeth Mairs	T	21		PR.PT-1	Policies are high-level statements; our organization would not create a Policy for this level of work	Replace 'policy' with 'standard or procedure'
16	Xcel Energy	Elizabeth Mairs	T	21		PR.PT-2	Policies are high-level statements; our organization would not create a Policy for this level of work	Replace 'policy' with 'standard or procedure'
17	Xcel Energy	Elizabeth Mairs	T	22		AE	Category description needs to factor in different controls for different risk levels of assets	'Anomalous activity on systems impacting Critical Infrastructure is detected...'
18	Xcel Energy	Elizabeth Mairs	T	22		CM	Category description needs to factor in different controls for different risk levels of assets	'The information system and assets controlling Critical Infrastructure are monitored...'
19	Xcel Energy	Elizabeth Mairs	T	23		DP	Category description needs to factor in different controls for different risk levels of CI assets	'...awareness of anomalous events in systems and assets supporting CI functions.'
20	Xcel Energy	Elizabeth Mairs	T	24		AN	Category description needs to factor in different controls for different risk levels of CI assets	'...recovery activities for systems and assets supporting CI functions.'
21	Xcel Energy	Elizabeth Mairs	T	25		MI	Category description needs to factor in different controls for different risk levels of assets	'...and eradicate incidents impacting systems and assets supporting CI functions.'
22	Xcel Energy	Elizabeth Mairs	T	25		RP	Category description needs to factor in different controls for different risk levels of assets	'...procedures are maintained and tested, consistent with the organization's risk strategy for CI, to ensure timely...'
23	Xcel Energy	Elizabeth Mairs	T	25		IM (within RC)	Category description needs to factor in different controls for different risk levels of assets	'...into future activities tied to systems and assets supporting CI functions.'

24	Xcel Energy	Elizabeth Mairs	G	42	App E	Definition of PII is too broad. The two 'etc's' invite confusion and differences of interpretation	Allow each organization or sector to define, based on the legal/regulatory requirements to which they are subject
----	-------------	-----------------	---	----	-------	--	---