Unofficial Comment Form

Project 2014-04 Physical Security

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=e524d13e839149d8b354c5a19a80064f) to submit comments on the draft CIP-014-1 Reliability Standard. The electronic comment form must be completed by 8:00 p.m. Eastern on **Thursday, April 24, 2014.**

If you have questions please contact Stephen Crutchfield via email or by telephone at or (609) 651-9455.

The project page may be accessed by clicking [here](http://www.nerc.com/pa/Stand/Pages/Project-2014-04-Physical-Security.aspx).

## Background Information

On March 7, 2014, the Federal Energy Regulatory Commission (FERC) issued an order directing NERC to submit for approval, within 90 days of the order, one or more Reliability Standards to address physical security risks and vulnerabilities of critical facilities on the Bulk Power System (BPS).[[1]](#footnote-1)

In the order, FERC stated that the proposed Reliability Standard(s) should require entities to take a least the following three steps:

* Perform a risk assessment to identify facilities that, if rendered inoperable or damaged, could result in instability, uncontrolled separation, or cascading failures on the BPS.
* Evaluate the potential threats and vulnerabilities to those identified facilities.
* Develop and implement a security plan designed to protect against physical attacks to those identified facilities based on the assessment of the potential threats and vulnerabilities to their physical security.

Additionally, FERC directed that the proposed Standard(s) should also: (1) include a procedure that will ensure confidential treatment of sensitive or confidential information; (2) include a procedure for a third party to verify the list of identified facilities and allow the verifying entity, as well as FERC, to add or remove facilities from the list of critical facilities; (3) include a procedure for a third party to review the evaluation of threats and vulnerabilities and the security plan; and (4) require that the identification of the facilities, the assessment of the potential risks and vulnerabilities, and the security plans be periodically reevaluated and revised to ensure their continued effectiveness. The proposed Physical Security Reliability Standard(s) must be filed with FERC by June 5, 2014.

In response to the order, NERC staff and the Standards Committee (SC) worked together in order to develop an action plan for meeting the June 5, 2014 filing deadline. The SC approved several waivers to facilitate meeting the required timelines and seated the Standard Drafting Team (SDT) on March 21, 2014.

This posting solicits comment on proposed Reliability Standard CIP-014-1 Physical Security. The proposed standard responds to the directives from the FERC order, and a summary of those directives with explanation of how the approach addresses them is available in the “Consideration of Issues and Directives” document on the project page.

You do not have to answer all questions below. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained. Due to the expected volume of comments, the SDT asks that commenters consider consolidating responses and endorsing comments provided by another.

**Questions**

1. **Applicability**: The applicability of proposed CIP-014-1 starts with those Transmission Owners that own Transmission facilities that meet the bright line criteria in Reliability Standard CIP-002-5.1 for a “medium impact” rating. The drafting team did not modify these criteria in their use under CIP-014-1, as they have been previously approved by stakeholders, NERC, and FERC. The SDT sought to ensure that entities could apply the same set of criteria to assist with identification of facilities under CIP Version 5 and proposed CIP-014-1. The team determined that slightly modified criteria could possibly result in confusion in application. The drafting team considered several other alternatives to refine the scoping in the applicability section, such as a particular kV threshold in addition to the other criteria; however, after significant discussion, the team found no technical or reliability basis for providing such limitiation. Importantly, by virtue of application of Requirement R1, the scope of the standard only applies to Transmission Owners that have Transmission stations and Transmission substations that meet the “medium impact” criteria from CIP-002-5.1, and their associated primary control centers. Furthermore, the standard drafting team expects many who are “applicable” to the standard will not identify facilities through their Requirement R1 risk assessment and Requirement R2 verification that if rendered inoperable or damaged could result in widespread instability, uncontrolled separation, or Cascading within an Interconnection. In those cases, the entity only performs Requirements R1 through R2. When that results in a null set, Requirement R1 additionally provides that subsequent risk assessments may occur less frequently. Similarly, while Transmission Operators are also listed in the applicability section, by virtue of application of the requirements, only certain Transmission Operators that are notified under the standard’s Requirement R3 have obligations under the standard. Do you agree with the applicability section? If not, please provide specific recommendations, ensuring to articulate how your suggested approach would not limit the applicability in such a manner as to inadvertently miss a facility that should be covered under the standard as specified in the FERC order on physical security.

[ ]  Yes

[ ]  No

Comments:

2. **Requirements R1 through R3**: The first three requirements of CIP-014-1 require Transmission Owners to: (1) perform risk assessments to identify through transmission planning analysis those Transmission stations and Transmission substations that meet the “medium impact” criteria from CIP-002-5.1, and their associated primary control centers, that if rendered inoperable or damaged could result in widespread instability, uncontrolled separation, or Cascading within an Interconnection; (2) arrange for a third party verification (as directed in the order) of the identifications; and (3) notify certain Transmission Operators of identified primary control centers that operationally control the identified and verified Transmission stations and Transmission substations. The requirements provide the periodicity for satisfying these obligations. Only an entity that owns or operates one or more of the identified facilities has further obligations in Requirements R4 through R6. If an entity identifies a null set after applying Requirements R1 through R2, the rest of the standard does not apply. Do you agree with this approach? If not, please articulate how an alternative approach addresses the directives specified in the order on physical security.

[ ]  Yes

[ ]  No

Comments:

3. **Requirements R4 through R6**: The final three requirements of CIP-014-1 require (1) the evaluation of potential threats and vulnerabilities of a physical attack to the facilities identified and verified according to the earlier requirements, (2) the development and implementation of a security plan(s) designed in response to the evaluation, and (3) a third party review of the evaluation and security plan(s) (as directed in the order). Do you agree with this approach? If not, please articulate how an alternative approach addresses the directives specified in the order on physical security.

[ ]  Yes

[ ]  No

Comments:

4. Do you have input on other areas of the standard or implementation plan not discussed in the questions above? If so, please provide them here, recognizing that you do not have to provide a response to all questions. Please limit your response to 300 words or less.

[ ]  Yes

[ ]  No

Comments:

1. *Reliability Standards for Physical Security Measures*, 146 FERC ¶ 61,166 (2014). [↑](#footnote-ref-1)