

# Meeting Notes

## Project 2014-02 Standard Drafting Team

May 12, 2014 | 1:00 p.m. – 5:00 p.m. ET  
May 13, 2014 | 8:00 a.m. – 5:00 p.m. ET  
May 14, 2014 | 8:00 a.m. – 12:00 p.m. ET

American Electric Power  
1 Riverside Plaza (Lower Lobby)  
Columbus, OH

### Monday, May 12

#### 1. **Working Lunch – Presentation by Michael Deloach on RAI Pilot from AEP**

Michael Deloach presented on American Electric Power's (AEP's) involvement in one of the ERO's Reliability Assurance Initiative (RAI) pilots. Mr. Deloach took questions as to what was involved with the pilot.

#### 2. **Welcome and Introductions**

NERC Staff welcomed observers and participants to the fourth face-to-face Standard Drafting Team (SDT) meeting. Introductions were made and AEP provided a safety briefing.

#### 3. **NERC Antitrust Guidelines and Public Meeting Notice**

The NERC Antitrust Guidelines and Public Meeting Notice were read.

#### 4. **Determination of Quorum**

The rule for a NERC Standard Drafting Team (SDT) states that a quorum requires two-thirds of the voting members of the SDT. Nine SDT members were in attendance, and one SDT member was participating remotely.

#### 5. **Review Agenda and Meeting Objectives**

Phil Huff reviewed the agenda and the overall meeting objective to prepare and finalize the CIP standards for an initial 45-day comment and ballot period.

#### 6. **Reliability Standard Audit Worksheet (RSAW) Run Through**

Felek Abbas gave an update on the RSAW development of the CIP Version 5 revisions standards. The history of the RSAWs was discussed and how the internal controls were audited in the prior versions of the standards that included the "identify, assess, and correct" language. As the FERC Order No. 791 was issued in November 2013, the RSAWs were put on hold pending this SDT's drafting activity.

With the new process of the concurrent posting of RSAWs with the associated Reliability Standards, the RSAWs shall be posted within 15 days after the 45-day comment and ballot period begins. The new process also

dictates that the RSAWs be developed in an open and transparent manner. The CIP V5 revisions RSAW drafting group includes NERC, Regional Entity audit staff, and industry reviewers.

The RSAW template was reviewed to discuss the boilerplate information that is contained within the RSAW. The review included what has been incorporated within existing RSAWs and also what has been revised to enhance the document. The CIP-002-5.1 RSAW was displayed as was the CIP-007 RSAW. It was noted that the current draft of CIP-007 contains the “identify, assess, and correct” language.

A question was raised as to how the ongoing development will continue and how the other standards’ RSAWs will look like, and what the SDT can provide as feedback. As for a timeline, the RSAW drafting team is meeting weekly.

A question was asked if all of the Regions are participating to ensure consistency. There is a document created jointly with NERC and the Regions that is the backbone of the audit practices. Outreach is crucial, too.

A question was raised about including CANs within RSAWs. The CIP V5 RSAW development group is being very careful to avoid including CANs (Compliance Application Notices) in the RSAWs.

#### **7. Quality Review Overview – Benchmarks for Reliability Standards**

A presentation was discussed surrounding the concepts of quality. Quality Review is a part of the fabric of standards development activities, from project inception to completion. The emphasis of the presentation was that quality review is an aspect that is continually ongoing.

#### **8. Implementation Plan Overview and Approach**

The SDT reviewed the latest draft of the Implementation Plan. NERC staff provided an overview of the structure of the plan and how the SDT should focus on compliance lead times for the modified requirements, and then the SDT can work around the April 1, 2016 date for showing the effective date of the revised standards.

#### **9. Identify, Assess, and Correct**

The SDT modified the Violation Severity Levels (VSLs) for those requirements previously containing Identify, Assess, and Correct (IAC) in Version 5.

### **Tuesday, May 13**

#### **10. Low Impact Assets Protections**

The action items were reviewed and modified for the areas left to address after the April SDT meeting. The SDT reviewed the requirement language to come to consensus on the approach for posting. While the parent Requirement R2 of CIP-003-6 contains slightly different language than the parent requirements of other requirements with tables, the SDT notes that the implementation of one or more documented processes are found in the actual requirement parts and that language is not needed in the parent requirement. Furthermore, Requirement R2, Part 2.1 calls for a review and approval of the cyber security policies in parts 2.2 through 2.5 and having the implementation language in the parent requirement would not work with the language in 2.1. As a result, the SDT determined that the parent requirement should not include implementation language.

A question was raised about Requirement R2, Part 2.4.3, for the Electricity Sector Information Sharing and Analysis Center (ES-ISAC) thresholds and why that was added. The SDT could not come to consensus and agreed to table the discussion for a conference call the following week.

The SDT reviewed the requirement parts and synchronized them with the appropriate requirement parts from other standards for Medium and High Impact BES Cyber Systems for the specific technical areas within Requirement R2. The Measures were appropriately revised after the requirement language was discussed.

For VSLs, the SDT needs to ensure those requirement parts that have multiple layers for the language of “but failed to...” Those VSLs will be modified offline and sent to the SDT for its review and comment.

#### 11. **Transient Devices**

A question was asked about why CIP-010 was used for transient devices. All requirements related to Transient Cyber Assets and Removable Media are included within a single standard, CIP-010. Due to the new requirement and definitions, the SDT determined that placing the requirements in a single standard would ensure that entities were able to quickly identify the requirements for these asset types. While the requirements are similar, they are not to the same rigor of those found in CIP-007-5 protecting the permanent assets identified by an entity. A separate standard was considered for these requirements. However, the SDT determined that these types of assets would be used in relation to change management and vulnerability assessment processes and should, therefore, be placed in the same standard as those processes.

A question was posed regarding transient devices and CIP-004, and whether there should be a specific line item for training in CIP-004 Requirement R2, Part 2.1. The SDT discussed this and decided to add to Requirement R2, Part 2.1.9 to include training content on cyber security risks associated with a BES Cyber System’s electronic interconnectivity and interoperability with other Cyber Assets, including Transient Cyber Assets, and with Removable Media.

#### 12. **Communication Networks**

It was agreed that this would be tabled for the Implementation Plan discussion on Wednesday.

#### **Wednesday, May 14**

An update was provided on the guidance documents that will be posted for industry comment. These documents will likely be posted for 15-day industry comment prior to the Standards Committee approval of the documents. NERC provided an update as for the Frequently Asked Questions document which will be posted as a supplemental document to the posting. After discussion, NERC took the comments from the SDT and provided a revision for posting.

#### 13. **Finalize Implementation Plan**

The SDT finalized the compliance lead time for those requirement parts being modified. For low impact asset protections in CIP-003-6, Requirement R2, nine months was decided as adequate. For communication networks in CIP-006-6, Requirement R1, Part 1.10, nine months was decided as adequate. For the applicability modifications in CIP-007-6, Requirement R1, six months was decided as adequate. For the transient devices in CIP-010-2, Requirement R4, nine months was decided as adequate. The comment form includes a question on the implementation plan and the compliance lead times. The SDT will review those comments to see if the proposed compliance lead times are sufficient and justified.

The SDT also added language from the CIP V5 implementation plan for the 1) initial performance of certain periodic requirements; 2) previous identity verification; and 3) planned or unplanned changes resulting in a higher categorization.

#### **14. Finalize Mapping Document**

It was decided that this document would be sent around for the SDT and observers to review. This document will be finalized offline.

#### **15. Finalize Consideration of Directives**

It was decided that this document would be sent around for the SDT and observers to review. This document will be finalized offline.

#### **16. Finalize Comment Form**

The SDT discussed the comment form at length. NERC staff provided key points to how the comment questions need to be clear and allow the SDT to take responses to the comments in an organized way to consider them properly. The comment form would be reviewed again after the QR.

#### **17. Discuss and Prepare Project Plan for the NERC Standards Committee**

The project plan calls for a projected posting of the Reliability Standards, Implementation Plan, VRFs, and VSLs on June 2, 2014. NERC staff gave an update about when documents are due, and when a formal QR would take place. The NERC Standards Committee (SC) process states that all the documents must be submitted at least five calendar days prior to the date of the meeting or call authorizing initial posting. NERC staff is working with the SC leadership on ensuring a conference call can take place to authorize the posting of the documents. Therefore, the SDT was made aware that documents would be likely due to the SC on May 23, 2014.

#### **18. Action Items and Next Steps**

Action items were captured for each of the remaining areas to be finalized.

#### **19. Planning for Webinars, Full Team Calls, etc.**

Full team calls will be scheduled to finalize the documents and review the comments from the QR. No webinars have been scheduled, but after the posting, there will be an industry webinar conducted by the SDT to provide key information on the revisions.

#### **20. Future Meeting Schedules and Venues**

- a. July 29-31, 2014 - TBD
- b. August 19-21, 2014 - TBD

#### **21. Adjourn**