

Standard Authorization Request (SAR)

Complete and submit this form, with attachment(s) to the [NERC Help Desk](#). Upon entering the Captcha, please type in your contact information, and attach the SAR to your ticket. Once submitted, you will receive a confirmation number which you can use to track your request.

The North American Electric Reliability Corporation (NERC) welcomes suggestions to improve the reliability of the bulk power system through improved Reliability Standards.

Requested information			
SAR Title:	CIP-002-5.1a Criterion 1.3 Revision		
Date Submitted:	March 20, 2023		
SAR Requester			
Name:	Mark Atkins, [member of 2021-03 CIP-002 Transmission Owner Control Center (TOCC)]		
Organization:	AESI-Inc.		
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SAR Type (Check as many as apply)			
<input type="checkbox"/>	New Standard	<input type="checkbox"/>	Imminent Action/ Confidential Issue (SPM Section 10)
<input checked="" type="checkbox"/>	Revision to Existing Standard	<input type="checkbox"/>	Variance development or revision
<input type="checkbox"/>	Add, Modify, or Retire a Glossary Term	<input type="checkbox"/>	Other (Please specify)
<input type="checkbox"/>	Withdraw/retire an Existing Standard		
Justification for this proposed standard development project (Check all that apply to help NERC prioritize development)			
<input type="checkbox"/>	Regulatory Initiation	<input type="checkbox"/>	NERC Standing Committee Identified
<input type="checkbox"/>	Emerging Risk (Reliability Issues Steering Committee) Identified	<input type="checkbox"/>	Enhanced Periodic Review Initiated
<input type="checkbox"/>	Reliability Standard Development Plan	<input checked="" type="checkbox"/>	Industry Stakeholder Identified
Industry Need (What Bulk Electric System (BES) reliability benefit does the proposed project provide?):			
<p>NERC Reliability Standard CIP-002-5.1a requires entities to identify and categorize Bulk Electric System (BES) Cyber Systems and their associated BES Cyber Assets for the application of cyber security requirements commensurate with the adverse impact that loss, compromise, or misuse of those BES Cyber Systems could have on the reliable operation of the BES. Identification and categorization of BES Cyber Systems support appropriate protection against compromises that could lead to misoperation or instability in the BES.</p> <p>Criterion 1.3 needs to have Criterion 2.6¹ reinserted into Criterion 1.3 for the Transmission Operator (TOP) to ensure proper high-impact categorization of BES Cyber System(s) related to Transmission assets that are identified as critical to the derivation of Interconnection Reliability Operating Limits</p>			

¹ Criterion 2.6 reads: "Generation at a single plant location or Transmission Facilities at a single station or substation location that are identified by its Reliability Coordinator, Planning Coordinator, or Transmission Planner as critical to the derivation of Interconnection Reliability Operating Limits (IROLs) and their associated contingencies."

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(IROLs) and their associated contingencies as also required of the Balancing Authority (BA) in Criterion 1.2 and the Generator Operator (GOP) in Criterion 1.4.
Purpose or Goal (How does this proposed project provide the reliability-related benefit described above?):
The proposed project will require the TOP to categorize its BES Cyber System(s) as high impact that meet Criterion 2.6 as is also required of the BA and GOP in Criterion 1.2 and 1.4, respectively. By including Criterion 2.6 in Criterion 1.3, the TOP's BES Cyber Systems(s) will be properly categorized as high impact for Transmission Facilities at a single station or substation location that is identified as critical to the derivation of Interconnection Reliability Operating Limits (IROLs) and their associated contingencies."
Project Scope (Define the parameters of the proposed project):
<ol style="list-style-type: none"> 1. Confirm consensus that Criterion 2.6 is applicable for identifying BES Cyber System(s) as a high impact in "[e]ach Control Center or backup Control Center used to perform the functional obligations of the Transmission Operator for one or more of the assets that meet Criterion 2.6. 2. In CIP-002-5.1a Attachment 1, add Criterion 2.6 to the list of Criteria in Criterion 1.3. 3. Conduct a review of NERC Reliability Standard CIP-002-5.1a and other associated NERC documents concerning Criterion 2.6 to ensure that the inclusion of Criterion 2.6 within Criterion 1.3 is in alignment with any other associated documents.
Detailed Description (Describe the proposed deliverable(s) with sufficient detail for a drafting team to execute the project. If you propose a new or substantially revised Reliability Standard or definition, provide: (1) a technical justification ² that includes a discussion of the reliability-related benefits of developing a new or revised Reliability Standard or definition, and (2) a technical foundation document (e.g., research paper) to guide the development of the Standard or definition):
<p>DELIVERABLES</p> <ol style="list-style-type: none"> 1. The addition of Criterion 2.6 in the list of criteria found in Criterion 1.3 of CIP-00-5.1a Attachment 1. 2. Initiate or complete necessary revisions to associated documents related to the inclusion of Criterion 2.6 in Criterion 1.3. <p>BACKGROUND</p> <p>CIP-002-5.1a Attachment 1, Criterion 1.2 identifies BES Cyber System(s) as a high impact in "[e]ach Control Center or backup Control Center used to perform the functional obligations of the Balancing Authority: 1) for generation equal to or greater than an aggregate of 3000 MW in a single Interconnection, or 2) for one or more of the assets that meet criterion 2.3, 2.6, or 2.9." The assets that meet each of the criterion as referenced in criterion 1.2 meet the medium impact rating level for a generation or Transmission Facility.</p>

² The NERC Rules of Procedure require a technical justification for new or substantially revised Reliability Standards. Please attach pertinent information to this form before submittal to NERC.

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CIP-002-5.1a Attachment 1, **Criterion 1.4** identifies BES Cyber System(s) as a high impact in “[e]ach Control Center or backup Control Center used to perform the functional obligations of the **Generator Operator** for one or more of the assets that meet criterion 2.1, 2.3, **2.6**, or 2.9.” The assets that meet each of the criterion as referenced in criterion 1.4 meet the medium impact rating level for a generation Facility.

CIP-002-5.1a Attachment 1, **Criterion 1.3** identifies BES Cyber System(s) as a high impact in “[e]ach Control Center or backup Control Center used to perform the functional obligations of the **Transmission Operator** for one or more of the assets that meet criterion 2.2, 2.4, 2.5, 2.7, 2.8, 2.9, or 2.10.” This is not consistent with Criterion 1.2 for the BA or Criterion 1.4 for the GOP. Criterion 2.6 is omitted from Criterion 1.3.

The issue is that Criterion 2.6 is included in Criteria 1.2 and 1.4 for the BA and GOP, respectively, but not in Criterion 1.3 for the TOP. When BA, TOP, and GOP all categorize BES Cyber System(s) as high for those assets meeting Criterion 2.6, the application of cyber security requirements is commensurate with the adverse impact that loss, compromise, or misuse of those BES Cyber Systems.

The archived Project 2008-06 Cyber Security Order 706 Version 5 CIP Standards³ is the project where CIP-002-4 was revised to version 5. Draft 1 of version 5, included Criterion 2.6 as a criterion (formerly 2.8) for categorizing BES Cyber System(s) used by the TOP concerning IROs. Through the development process, the criterion was remapped from 2.8 to 2.6 in draft 2.⁴ Also, in draft 2, the development team removed what became Criterion 2.6 concerning IROs from Criterion 1.3 that identified BES Cyber System(s) as a high impact in “[e]ach Control Center or backup Control Center used to perform the functional obligations of the Transmission Operator for one or more of the assets that meet criterion 2.2, 2.4, 2.5, 2.7, 2.8, 2.9, or 2.10.”

A technical justification is not necessary since it appears the omission of Criterion 2.6 in Criterion 1.3 was an error created during the revision of CIP-002 from version 4 to 5 when ordering the medium impact criteria.

Cost Impact Assessment, if known (Provide a paragraph describing the potential cost impacts associated with the proposed project):

The cost impact is unknown at this time. However, a question will be asked during the comment period to ensure cost aspects are considered.

Please describe any unique characteristics of the BES facilities that may be impacted by this proposed standard development project (e.g., Dispersed Generation Resources):

³ https://www.nerc.com/pa/Stand/Pages/Project_2008-06_Cyber_Security_Version_5_CIP_Standards.aspx

⁴ In transition from the version 5 revision work between drafts 1 and 2, the Transmission Owner (TO) was removed from Criterion 2.8 (draft1) and the criterion became Criterion 2.6 (draft 2) through to the final version 5 of the standard.

Requested information
To assist the NERC Standards Committee in appointing a drafting team with the appropriate members, please indicate to which Functional Entities the proposed standard(s) should apply (<i>e.g.</i> , Transmission Operator, Reliability Coordinator, etc. See the most recent version of the NERC Functional Model for definitions):
Balancing Authority, Distribution Provider, Generator Operator, Generator Owner, Interchange Coordinator or Interchange Authority, Reliability Coordinator, Transmission Operator, Transmission Owner
Do you know of any consensus building activities ⁵ in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.
Are there any related standards or SARs that should be assessed for impact as a result of this proposed project? If so, which standard(s) or project number(s)?
2021-03 CIP-002 Transmission Owner Control Center (TOCC) The 2021-03 CIP-002 Transmission Owner Control Center (TOCC) is currently reviewing and developing revised language for criterion 2.12. In those discussions, the question regarding criterion 2.6 and criterion 1.3 has been raised, but the justification for criteria 2.6 being omitted from criterion 1.3 is unknown.
Are there alternatives (<i>e.g.</i> , guidelines, white paper, alerts, etc.) that have been considered or could meet the objectives? If so, please list the alternatives.

Reliability Principles	
Does this proposed standard development project support at least one of the following Reliability Principles (Reliability Interface Principles)? Please check all those that apply.	
<input type="checkbox"/>	1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
<input type="checkbox"/>	2. The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.
<input type="checkbox"/>	3. Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.
<input type="checkbox"/>	4. Plans for an emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained, and implemented.
<input checked="" type="checkbox"/>	5. Facilities for communication, monitoring, and control shall be provided, used, and maintained for the reliability of interconnected bulk power systems.
<input type="checkbox"/>	6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, and qualified, and have the responsibility and authority to implement actions.
<input type="checkbox"/>	7. The security of the interconnected bulk power systems shall be assessed, monitored, and maintained on a wide area basis.

⁵ Consensus building activities are occasionally conducted by NERC and/or project review teams. They typically are conducted to obtain industry inputs prior to proposing any standard development project to revise, or develop a standard or definition.

Reliability Principles

8. Bulk power systems shall be protected from malicious physical or cyber attacks.

Market Interface Principles

Does the proposed standard development project comply with all of the following Market Interface Principles ?	Enter (yes/no)
1. A reliability standard shall not give any market participant an unfair competitive advantage.	YES
2. A reliability standard shall neither mandate nor prohibit any specific market structure.	YES
3. A reliability standard shall not preclude market solutions from achieving compliance with that standard.	YES
4. A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards.	YES

Identified Existing or Potential Regional or Interconnection Variances

Region(s)/ Interconnection	Explanation
<i>e.g.</i> , NPCC	

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SAR Status Tracking (Check off as appropriate).	
<input type="checkbox"/> Draft SAR reviewed by NERC Staff	<input type="checkbox"/> Final SAR endorsed by the SC
<input type="checkbox"/> Draft SAR presented to SC for acceptance	<input type="checkbox"/> SAR assigned a Standards Project by NERC
<input type="checkbox"/> DRAFT SAR approved for posting by the SC	<input type="checkbox"/> SAR denied or proposed as a Guidance document

Version History

Version	Date	Owner	Change Tracking
1	June 3, 2013		Revised
1	August 29, 2014	Standards Information Staff	Updated template
2	January 18, 2017	Standards Information Staff	Revised
2	June 28, 2017	Standards Information Staff	Updated template

3	February 22, 2019	Standards Information Staff	Added instructions to submit via Help Desk
4	February 25, 2020	Standards Information Staff	Updated template footer