

Non-Endorsed Implementation Guidance - Last Updated 2/7/2022

Year	Implementation Guidance Title	Additional Information	Date Announced
2021	CIP-005-7 R3 Electronic Security Perimeters (2019-03 SDT)	The ERO Enterprise unanimously declined to endorse the proposed Implementation Guidance (IG). The proposed IG does not provide specific examples as required by the IG. In addition, the proposed IG includes a statement of position concerning Intermediate Systems usage. Lastly, the IG is a cut and paste of the CIP-005-7 Guidelines and Technical Basis, ERO Enterprise suggest that the PQO should consider including this in Technical Rationale.	1/5/2022
	CIP-010-4 R1 Configuration Change Management and Vulnerability Assessments (2019-03 SDT)	The ERO Enterprise declined to endorse the proposed Implementation Guidance (IG). The submitted guidance in general is a copy/paste from existing Guidelines and Technical Basis, ERO Enterprise suggest that the PQO should consider including this in Technical Rationale. The proposed IG could lead entities to believe there are additional compliance obligations by making a reference to the referenced NIST document. The NIST reference isn't named or introduced, nor is there a link to the document. In addition, the submitted proposed IG doesn't provide specific examples or approaches to comply with the Requirements.	1/5/2022
	CIP-013-2 Supply Chain Risk Management Plans (2019-03 SDT)	The ERO Enterprise unanimously declined to endorse the proposed Implementation Guidance (IG) based on its expansion of Requirement R2 scope by pulling contracts within the requirement. There was a significant focus on contracts throughout the document and there are other methods that may be considered. Further clarity is needed to ensure entities understand contracts are one example on how to comply with the Requirements. Additionally, there were additional aspects that hinder the IG from being endorsed, for example, 1) the proposed IG references specific vendor products and 2) it fails to address guidance on mitigating controls to reduce the risk if the vendor is unwilling to engage in the negotiation process for cyber security controls. Lastly, the proposed IG states, "Vendor's risk assessments" but the ERO Enterprise believes this should be "Responsible Entity's risk assessment of the vendor" and this should be clarified to not cause confusion for industry.	1/5/2022
	CIP-004-7 Personnel & Training (2019-02 SDT)	The ERO Enterprise unanimously declined to endorse the proposed Implementation Guidance (IG). The proposed IGs high level guidance does not include specific examples as required by Implementation Guidance. In addition, the IG is a cut and paste of the CIP-004-6 Guidelines and Technical Basis, ERO Enterprise suggest that the PQO should consider including this in Technical Rationale.	1/5/2022
	EOP-011-2 Emergency Operations and Preparedness (2019-06 SDT)	The ERO Enterprise declined to endorse this Implementation Guidance because it does not provide sepcific examples, or approaches, on how an entity could meet compliance. Additionally, the proposed IG is less stringent than the standard and thus possibly misleading, or subject to misinterpretation.	1/5/2022
	CIP-004-6 and CIP-011-2 Cloud Solutions and Encrypting BCSI (RSTC)	The ERO Enterprise declined to endorse this proposed Implementation Guidance document because it does not address many of the concerns identified in the initial IG review in 2020. Specifically the guidance should be vendor agnostic, or a disclaimer should to be included that states the elements prescribed in the guidance is relevant at the time it is written. It is understood that vendors change their practices and therefore this information in the guidance may become irrelevant later down the line. In the 'Evidence Example' the "notification for terminations" statement is problematic as it does not align with the language of the standard, which is "termination action". Under 'Terms' the "Shared Responsibility Model" needs to be struck, or further clarified, as it implies transference of compliance obligations. Some of the elements in the 'Evidence Example' would fail to demonstrate compliance over the course of time. Overall the guidance can be misleading and needs additional clarity.	8/12/2021
	CIP-007-6 R1 Software Defined Networking: Logical Network Accessible Ports (EnergySec)	The ERO Enterprise unanimously declined to endorse this proposed Implementation Guidance document because it does not provide specific approaches or examples for an entity to demonstrate compliance. Additionally, the proposed Implementation Guidance is written as a whitepaper or a position paper. The proposed document provides no specific compliance implementation guidance. The ERO Enterprise stresses the importance of the use of the Implementation Guidance Development Aid.	8/12/2021
	CIP-005-6 R2.4_R2.5 Vendor Support via Web Conferencing (NATF)	The ERO Enterprise declined to endorse this Implementation Guidance as the proposed NATF IG does not provide examples or approaches for registered entities to comply with CIP-005-6 Requirement R2. Instead, the proposed IG introduces positions and definitions (e.g. vendor remote access and control) which may be viewed as changing the meaning of the requirement or interpreting the requirement. Additionally, the proposed IG contains statements that may be viewed as limiting CMEP personnel's ability to obtain reasonable assurance of compliance. As an example, the proposed IG contains the following statement "there is no compliance evidence to retain for each such session". In summary, the proposed IG did not sufficiently address the Implementation Guidance Development and Review Aid.	4/28/2021
	CIP-013-2 Supply Chain Risk Management Plans (2019-03 SDT)	The ERO Enterprise declined to endorse this Implementation Guidance as several revisions are necessary for clarity purposes in order to avoid entity confusion.	3/24/2021
	CIP-010-4 R1 Configuration Change Management and Vulnerability Assessments (2019-03 SDT)	The ERO Enterprise declined to endorse this Implementation Guidance as several revisions are necessary for clarity purposes in order to avoid entity confusion.	3/24/2021

	CIP-005-7 R3 Electronic Security Perimeters (2019-03 SDT):	The ERO Enterprise declined to endorse this Implementation Guidance as some of the examples provided were incomplete which could lead to entity misinterpretation of the examples. Additionally, there are several misleading statements regarding "staff augmentation". Finally, there are inconsistencies in the use of similar, but different, terminology which could lead to entity confusion.	3/24/2021
2020	PRC-019-2 Coordination of Voltage Control Systems, Protection Systems, and Equipment Capabilities (RSTC)	The ERO Enterprise unanimously declined to endorse this document for the reasons that follow. The IG conflicts with line 15 of the Implementation Guidance Development and Review Aid, which states IG shouldn't be a whitepaper or technical reference. The calculations should be more of an appendix. The example should be more what things are considered and how, calculations are not the thrust of that. Additionally, none of the examples speak to the plant control system for dispersed power producing resources. Finally, Table 3.1 mentions using the Unsaturated Transient Reactance when evaluating Loss of Field (40) settings for PRC-019-2 compliance, which is apparently an error which disagrees with the calculations in the appendix of IEEE Standard C37.102-2006, which is an Associated Document of PRC-019-2 which uses Saturated Transient Reactance.	12/8/2020
	CIP-004-6 and CIP-011-2 Cloud Solutions and Encrypting BCSI (NERC RSTC)	The ERO Enterprise declined to endorse this proposed Implementation Guidance document because several points of concern have been identified. First, the proposed guidance is too prescriptive, missing necessary elements of the requirement, and provides inaccurate statements that are contrary to the current language of the standards. This in turn could mislead an entity into a possible noncompliance (e.g. shared compliance responsibilities, initial timeframe for personnel revocations, etc.). In addition, the proposed guidance has an "Evidence Example" table in which it prescribes that all listed artifacts are necessary to demonstrate compliance. While these elements may be appropriate to demonstrate compliance, mandating all the artifacts may not be consistent with the requirements and/or entity specific facts and circumstances. Lastly, the ERO Enterprise highlighted numerous other issues which will be shared with the RSTC for them to address prior to resubmitting for future ERO Enterprise endorsement.	11/5/2020
	CIP-008-6 Incident Reporting and Response Planning (2018-02 SDT)	The ERO Enterprise declined to endorse this proposed Implementation Guidance document because there are several concerns within the document which resulted in the guide not receiving an unanimous vote to endorse. To summarize the concerns, the guide is clearer than the previous version submitted; however, some statements are not appropriate for Implementation Guidance. These statements may be viewed as an ERO Enterprise audit approach and/or directing CMEP staff decision making. In conclusion, the ERO Enterprise is not planning on endorsing the guidance; however, we will be providing detailed feedback to the drafters.	11/5/2020
	CIP-010-2 Configuration Change Management & Monitoring ((MRO CMEPAC)	The ERO Enterprise declined to endorse this proposed Implementation Guidance document because in its current state, the proposed guidance does not align with criterion outlined in the Implementation Guidance Development Aid, namely it is overly broad, large, has misleading statements that could lead an entity to a possible noncompliance, and attempts to be all encompassing. Furthermore, there are several references to obsolete technologies and tools not fully vetted by the ERO Enterprise that could potentially lead entities into operational, as well as compliance, issues. Lastly, there were numerous other issues highlighted by the ERO Enterprise. These details will be sent to the creators of the guidance document to be addressed for future consideration of ERO endorsement.	11/5/2020
	MOD-025-2 Verification and Data Reporting of Generator Real and Reactive Power Capability and Synchronous Condenser Reactive Power Capability (MRO CMEPAC)	The ERO Enterprise declined to endorse this proposed Implementation Guidance document because it does not appear to provide useable examples of compliance and repeats the Standard in order to interpret it. The given example at the back lacks detailed engineering analysis, and the mention of "use other data sources" does not explain how to conduct the Real and Reactive Power capability tests.	11/5/2020
	TPL-007-4 Transmission System Planned Performance for Geomagnetic Disturbance Events (OC)	The ERO Enterprise declined to endorse this proposed Implementation Guidance document because it does not provide specific approaches or examples for the requirements addressed.	11/5/2020
	CIP-005-6, R2.4 and R2.5, Vendor Remote Access (NATF)	The ERO Enterprise declined to endorse this proposed Implementation Guidance document because there are created definitions that could mislead entities into possible non-compliance. The IG includes an incorrect statement that the method does not need to be able to distinguish between vendor remote access sessions and non-vendor remote access sessions, which directly conflicts with the Reliability Standard.	3/10/2020
	CIP-010-2, R4, Transient Cyber Assets (NATF)	The ERO Enterprise declined to endorse this proposed Implementation Guidance document because some issues remain from the 2017 non-endorsement. Some of the examples or approaches to compliance need to be further refined. Models should be referenced as examples rather than definitions to avoid entity confusion. IG could mislead an entity to not consider all 3 sub-parts of Attachment 1, Section 1.2 as part of a solution.	3/10/2020
2019	TOP-001-4 and IRO-002-5 - Data Exchange Infrastructure and Testing Requirements (NERC OC)	The ERO Enterprise declined to endorse this proposed Implementation Guidance document because it conflicts with the Reliability Standard and related FERC order 817.	3/10/2020
	CIP-008-6 Incident Reporting and Response Planning (2018-02 SDT)	The ERO Enterprise declined to endorse this proposed Implementation Guidance document because it includes statements or terminology that do not align with the language of the Reliability Standard or the NERC Glossary of Terms definitions. These statements and terminology may cause entity confusion and could lead to possible non-compliance.	3/10/2020
	CIP-012-1, R1 – Communications Between Control Centers (2016-02 SDT)	The ERO Enterprise declined to endorse this proposed Implementation Guidance document because it does not provide sufficient detail regarding device configurations, availability, reporting, and encryption monitoring. The IG could result in entity confusion and lead to possible non-compliance.	3/10/2020

2017	CIP-004-6, R4, R5, BCSI Repositories Managed by Service Providers (EnergySec)	The ERO Enterprise declined to endorse this proposed Implementation Guidance document because it includes several statements that do not align with the language of the Reliability Standard, and does not offer specific examples entities could use to meet compliance. These statements may cause entity confusion and could lead to possible non-compliance.	6/24/2019
	MOD-025-2 Verification and Data Reporting of Generator Real and Reactive Power Capability and Synchronous Condenser Reactive Power Capability (MRO SC)	The ERO Enterprise declined to endorse this proposed Implementation Guidance document because it includes several statements that do not align with the language of the Reliability Standard and the previous Request for Information (RFI). These statements may cause entity confusion and could lead to possible non-compliance.	6/24/2019
2018	CIP-010-2 R1 R2 Configuration Change Management and Vulnerability Assessment (MROSC)	The ERO Enterprise declined to endorse this document. Due to the volume and complexity of the document, there are clarification or enhancements needed to allow for a clear and comprehensible approach to meeting compliance with the Standard without the document becoming unnecessarily large or attempting to be all-encompassing. Without such clarifications or enhancements, it may cause entity confusion and could lead to possible non-compliance.	6/24/2019
	CIP-013-1 Implementation Guidance (NATF)	The ERO Enterprise declined to endorse this document as it only partially addresses R1.2, which may lead to entity confusion.	12/21/2018
	CIP-002-5.1a, R1, Voice Communications in a CIP Environment (CIPC)	The ERO Enterprise declined to endorse this document because it conflicts with the CIP-002 Requirements. Additionally, the document does not provide clear guidance on how voice communications are evaluated as BES Cyber Assets (BCA). As written, this document suggests that voice technology would never be considered a BCA or part of a BES Cyber System.	5/21/2018
2017	CIP-010-2, R4, Implementation and Use of Transient Cyber Assets (TCA)	The ERO Enterprise declined to endorse this document because the examples provided may not provide enough guidance to demonstrate compliance. Additionally, this document contains misleading statements that compliance documentation required to demonstrate compliance may not need to be generated. Finally, this document discusses the "on-demand model" and includes statements that this model requires extensive additional compliance documentation, but it would not be explored in this document.	2/7/2018
	CIP-005-6, R2.4 and R2.5, Vendor Remote Access	The ERO Enterprise declined to endorse this document because the guidance deepens confusion on how to comply with the Standard as it does not cover all connection scenarios. Also, the Standard is not approved yet and it appears to focus on future connections and not "active" connections, as called out in the Standard. Additionally, there is confusion regarding what the reference model is trying to state as it does not provide direction. Finally, this document lacks process-based recommendations and appears to include high-level policy interpretations.	2/7/2018
	MOD-027-1 Compliance Guidance	The ERO Enterprise declined to endorse this document because it conflicts with the language of the Reliability Standard, and more specifically the clarifying parenthetical note included in the Verification Condition criteria of Attachment 1, Row 7. This document would allow a unit that responds to frequency in only one direction to apply the Row 7 Verification Condition contrary to the parenthetical note in Row 7. The note clearly states that Row 7 applies only to units that do not respond to frequency excursions because either a) the unit does not operate in a frequency control mode, or b) the unit does not have an installed frequency control system, or it has been disabled.	1/18/2018
	CIP-003-6 R2 Standard Application Guide	The ERO Enterprise declined to endorse this document because there are numerous examples provided with subjective opinions regarding what is "good vs poor" in terms of control effectiveness as well as multiple references to cost. Compliance Guidance should provide an approach to meeting compliance rather than a broad, subjective evaluation of options that may or may not be relevant for a particular registered entity based on its particular circumstances. Additionally, the guidance document attempts to address numerous different issues which may lead to entity confusion.	1/18/2018
2017	PRC-004-5(i) Protection System Misoperation Identification and Correction	The ERO Enterprise declined to endorse this document as it could cause an entity to be in non-compliance because it is not clear that an entity which does not elect to include similar Protection System components, or locations, within its CAP shall have documentation of the evaluation and the timeline to make necessary corrections.	9/7/2017
	Transient Voltage Criteria Reference Document	The ERO Enterprise declined to endorse this document as it is more of a reference\whitepaper document that does not provide examples or methods to comply with the standard.	5/4/2017
	TPL 001-4 Modeling Reference Document	The ERO Enterprise declined to endorse this document mainly because the "Modeling of Known Outages": Sections states "Transmission Planners need to explain their outage planning process for R1.1.2." However, R1.1.2 does not require an outage coordination process, or an explanation of an outage coordinating process. There are also a number of issues that the ERO Enterprise believes can cause confusion and/or lead to incorrect application of the guidance such as incorrect footnote references and the references to "appendices" rather than "attachments", as they are called in the standard.	5/4/2017
	Determination and Application of Practical Relaying Loadability Ratings, Version 1.0, June 2008 for PRC-023	The ERO Enterprise declined to endorse this document because of the content changes between version 1 and the current version 3 of the Standard. In addition the guidance does not acknowledge or include the second bullet point for both criteria 10 and criteria 11 of R1 (which have been unchanged in all versions of PRC-023). Therefore, the ERO Enterprise determined that endorsing the version 1 guidance could cause confusion for industry in trying to determine what portions of the version 1 guidance are still relevant under the current version 3 Standard.	10/31/2016

2016	PER-005-1 Standard Application Guide	The ERO Enterprise declined to endorse this document because the content is largely different than that of the current standard version, PER-005-2. The ERO Enterprise noted that there were many changes in each requirement going from version 1 to version 2. Moreover, the addition of “support personnel” was another significant change in PER-005-2. Therefore, the ERO Enterprise determined that endorsing the version 1 guidance could cause confusion for industry in trying to determine what portions of the version 1 guidance are still relevant under version 2. Below is a list of changes that impacted this determination: <ul style="list-style-type: none"> - Addition of “Real-time” modifier to task list in R1.1 - Addition of a documented methodology for developing task list in R1.1 - Removal of requirement to develop learning objectives in R1.2 - Changed “annual” language to calendar year in R1.4 - Removal of 32 hours of emergency training - Addition of RC, BA, TOP support personnel - Addition of TO and GOP personnel 	10/31/2016
	PER-005-1 System Personnel Training Reference Document	The ERO Enterprise declined to endorse this item as this document provides mostly reference material supporting the Standard rather than examples of possible ways of complying with a particular requirement. Also, this information is already available publicly.	10/31/2016
	Compliance Operations Draft Reliability Standard Compliance Guidance for PER-005-2 October 1, 2013	The ERO Enterprise declined to endorse this item as Implementation Guidance because this is a document written by NERC Compliance Operations (predecessor to Compliance Assurance). The document was written to “assist the SDT in further refining the Standard and to serve as a resource in the development of training for auditors.” This document is written in a FAQ style and focuses on guidance for monitoring compliance, not implementation guidance for industry. While we recognize there is some overlap in that guidance, we do not believe it is appropriate for Implementation Guidance to be directed at the auditors.	10/31/2016
	TPL-007-1 Screening Criterion for Transformer Thermal Impact Assessment	The ERO Enterprise declined to endorse this item as Implementation Guidance because it is a whitepaper that provides background and explanation for the 75A per phase GIC threshold utilized in Standard TPL-007-1. The document is helpful background information for why the Standard Drafting Team chose the particular threshold, but it does not provide an approach towards compliance.	10/31/2016