



NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Compliance Application Notice — 0005

Compliance Application: CIP-002-3 R3

Posted June 22, 2010

Effective October 1, 2010 | *Effective until retired or until a subsequent version of this standard is FERC-approved and enforceable.*

Primary Interest Groups

Balancing Authorities	Load Serving Entities	Transmission Service Providers
Generator Operators	NERC	Transmission Operators
Generator Owners	Regional Entities	Transmission Owners
Interchange Authorities	Reliability Coordinators	

Issue: Compliance Clarity

Registered entities and Regional Entities requested clarity regarding whether system operator laptops¹ with the capability and purpose of controlling Bulk Electric System assets remotely (whether in normal operations or in emergencies) should be designated as Critical Cyber Assets (CCAs).

Compliance Application

System operator laptops with the capability and purpose of controlling Bulk Electric System assets remotely (whether in normal operations or in emergencies) should be designated as CCAs under [CIP-002-2 Requirement R3](#). Registered entities should consider this guidance when developing and using its risk-based assessment methodology to designate Critical Assets and associated CCAs. These laptops provide essential functionality for operation of Critical Assets similar to back-up control centers. While these laptops, as described above, significantly enhance electric system reliability by providing redundant and diverse capability and communications paths, their use can impact the reliable operation of a Critical Asset that is essential to reliable operations.

Background

The practice of when to designate a laptop as a CCA has differed among registered entities and Regional Entities. Some entities have designated laptops as CCAs if the laptop can remotely access CCAs and non-CCAs that reside in an Electronic Security Perimeter (ESP), while others have not. NERC recognizes the need for flexibility in allowing remote access to ensure electric system reliability, as well as the requisite obligation to designate the laptops as described above as CCAs to ensure electric system reliability. As of ninety days after the posting date of this Compliance Application Notice, October 1, 2010, NERC compliance monitoring and enforcement activities will treat system operator laptops with the capability and purpose of controlling

¹ System operator laptops include, but are not limited to, any portable device used by a system operator, including notebooks, netbooks, tablets, or PDA devices, whether wired or wireless, with the capability and purpose of controlling Bulk Electric System assets remotely, as described above.

Bulk Electric System assets remotely (whether in normal operations or in emergencies) as CCAs, and as such, all Critical Infrastructure Protection Standards must be adhered to for these devices. This places an appropriate focus on cyber security in accordance with the suite of Critical Infrastructure Protection standards. Future efforts are underway to refine NERC Reliability Standards for remote access, including the Reliability Standards Project 2008-06 Cyber Security 706 and an Urgent Action Standard Authorization Request that is under development. This CAN does not address compliance or noncompliance issues with respect to other systems, configurations or devices and they may similarly be subject to enforcement action in accordance with the Critical Infrastructure Protection Standards.

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This document is designed to convey compliance guidance from NERC's various activities. It is not intended to establish new requirements under NERC's Reliability Standards or to modify the requirements in any existing NERC Reliability Standard. Compliance will continue to be assessed based on language in the NERC Reliability Standards as they may be amended from time to time. Implementation of this compliance application notice is not a substitute for compliance with requirements in NERC's Reliability Standards. Compliance Application Notices are effective 90 days after their issuance. Compliance Application Notices will be reviewed annually and will be modified or retired when the associated NERC Reliability Standard is approved by FERC or other applicable regulatory authorities, revised, or retired, as applicable.