

# Meeting Notes Project 2014-02 Standard Drafting Team

October 22, 2014 | 9:00 a.m. – 5:00 p.m. CT October 23, 2014 | 8:00 a.m. – 5:00 p.m. CT October 24, 2014 | 8:00 a.m. – 12:00 p.m. CT

ERCOT – Austin MET Center 7620 Metro Center Drive Austin, TX 78744 415-973-2277 Location Information

# **Meeting Objectives**

- Prepare -X Standards for Final Ballot
- Prepare draft Consideration of Comments
- Prepare documents for next steps

# Wednesday, October 22

- 1. Welcome and Introductions
- 2. Safety Information and Logistics
- 3. NERC Antitrust Guidelines and Public Meeting Notice
- 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. Eight SDT members were present in-person, so quorum was achieved.

5. Review Agenda and Meeting Objectives

The SDT reviewed the meeting objectives and the components needed for the next posting for comment and ballot or final ballot.

- 6. Overview of Additional Comment Period and Ballot Results
  - a. Ballot Results

The additional ballot concluded on October 17, 2014 and all ballots received sufficient affirmative votes to pass ballot.

b. Overview of Comments



The SDT provided an overview of comments received as a result of the additional comment period. The comments discussed are posted <a href="here">here</a>.

c. Standard Processes Manual Requirements and Next Steps

NERC staff provided an overview of next steps according to the Standard Processes Manual. The SDT had the option of either posting for final ballot or for an additional comment period and ballot if substantive changes were made to the standards. NERC staff reviewed what would be considered substantive or nonsubstantive changes according to the SPM.

# 7. Discuss Plan for Consideration of Comments

The SDT would review the comments for the –X standards to determine if it should go for final ballot. If posted for final ballot, the SDT would post the consideration of comments related to the –X standards separately from the consideration of comments related to the other standards, definitions, and implementation plan.

# 8. Develop Response to Comments for Question 6

The SDT's response to comments regarding –X are posted here.

### 9. Finalize –X Posting Package

After review of the comments, the SDT determined that the –X standards and implementation plan should be posted for final ballot. The SDT reviewed the documents listed below and approved them for posting.

- a. VRF/VSL Justification
- b. Standards
- c. Implementation Plan
- d. Consideration of Comments to Question 6

# Thursday, October 23

## 10. CIP-010-2 Consideration of Comments

a. Overview of Comment Summary for Question 3 (CIP-010-2) and Question 4 (CIP-010-2 Definitions)

The SDT reviewed the summary of comments received regarding the transient devices requirements and definitions. The SDT determined that it should make substantive revisions to the standards and definitions based on the comments received. Therefore, the SDT began preparing the documents for an additional comment period and ballot.

- b. Response to comments for Question 3, CIP-010-2
  - Develop responses and assign additional drafting for revisions

The SDT discussed the bullet on "restricted communication" as a means to meet the security objective for mitigating malicious code on Transient Cyber Assets. The SDT determined it should develop guidance on what this bullet means. The SDT also discussed the "theft recovery tools" bullet as a means to meet the security objective for mitigating the risk of unauthorized



use for Transient Cyber Assets. The SDT also discussed whether bullets were needed in the requirements in general. However, the SDT determined that although the bullets allow for "other methods" to meet the security objective, the security objective would be vague without the more clarifying bullets in the requirement. Therefore, the SDT determined to keep the bullets in the Attachment language but would further discuss refining their content.

c. Response to comments for Question 4, Transient Cyber Asset and Removable Media definitions

The SDT revised the structure of the definitions to clarify the SDT's intent. For Removable Media, the SDT changed the language to include "transferring" executable code. For Transient Cyber Assets, the SDT determined it should ensure the definition gave as much clarity as possible as to what is a Transient Cyber Asset versus a Protected Cyber Asset or BES Cyber Asset.

### 11. CIP-003-6 Consideration of Comments

a. Overview of Comment Summary for Question 1 (CIP-003-6) and Question 2 (CIP-003-6 Definitions)

The SDT reviewed the summary of comments received regarding the low impact requirements and definitions. The SDT determined that it should make substantive revisions to the standards and definitions based on the comments received. Therefore, the SDT began preparing the documents for an additional comment period and ballot.

- b. Response to comments for Question 1, CIP-003-6
  - o Develop responses and assign additional drafting for revisions

The SDT developed responses for the consideration of comments and started working on revisions to address the comments.

The SDT discussed revising the requirement regarding physical security controls. Specifically, the SDT discussed using "controls" versus "restricts" to clarify the security objective. In addition, the SDT reviewed the use of "based on need" in the requirement language. The SDT determined that it advanced the security objective of the requirement and retained the language. The SDT also determined to remove the bullets outlining methods to achieve the objective because the objective alone would be enough for the requirement language to be clear. The language included in the bullets would still be a method for meeting the requirement.

The SDT also discussed whether it was necessary to include the record retention requirements. The SDT determined that it did not need to keep the record retention language in the requirement.

The SDT determined additional guidance would be helpful and assigned members to draft language.

c. Response to comments for Question 2, Low Impact External Routable Connectivity (LERC) and Low Impact BES Cyber System Electronic Access Point (LEAP) Definitions

The SDT developed responses for the consideration of comments and started working on revisions to the definitions to address the comments.



The SDT discussed how to further clarify LERC and LEAP. The SDT noted that the intent behind LERC and LEAP was to provide some demarcation for communications in and out of the asset containing low impact BES Cyber Systems. The SDT wanted to clarify the LERC definition that LEAP is the intermediary. The SDT determined that additional reference model examples would help demonstrate the intent behind LERC and LEAP.

The SDT reviewed whether it should keep the Electronic Access Control or Monitoring System (EACMS) language in the definition of LEAP. The SDT determined that including the language in the definition did not provide clarification and removed it from the definition. The SDT decided to develop guidance on EACMS and LEAP to distinguish the two terms.

The SDT would continue discussing revisions to the lows definitions on conference calls.

# 12. Implementation Plan Consideration of Comments

a. Overview of Comment Summary for Question 5 (Implementation Plan)

The SDT reviewed the comments received for the Implementation Plan and determined it should make a substantive revision. Therefore, the Implementation Plan would be posted for an additional comment period and ballot.

b. Response to comments for Question 5

The SDT revised the implementation date for the physical security controls for lows to match that of the electronic access controls for lows for consistency.

# 13. Review of Drafting Assignments

The SDT assigned drafting revisions and response to comments to its members.

### Friday, October 24

### 14. Action Items

a. Consideration of Comments

The SDT would continue to work on the consideration of comments document.

b. Quality Review Next Steps

The SDT would ensure that the standards, definitions, and implementation plan went through quality review prior to posting for an additional comment period and ballot.

### 15. Planning for Outreach, Webinars, Full Team Calls, etc.

The SDT would hold a webinar during the additional comment period.

### 16. Future Meeting Schedules and Venues

The SDT discussed holding a face-to-face meeting in November in Dallas, TX.

# 17. Adjourn