Unofficial Comment Form

# Project 2016-02 Modifications to CIP Standards

Requirements for Transient Cyber Assets

**Do not** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments
on the **Modifications to address the Federal Energy Regulatory Commission directive regarding the mandatory protection for transient devices used at Low Impact BES Cyber Systems.** The electronic form must be submitted by **8 p.m. Eastern, Friday, November 18, 2016.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project%202016-02%20Modifications%20to%20CIP%20Standards.aspx). If you have questions, contact Senior Standards Developer, Al McMeekin at (404) 446-9675.

**Development Plan for LERC and TCA Modifications**

The CIP Modifications Standard Drafting Team is currently addressing eight issue areas within the CIP standards including two FERC directed issue areas that directly impact the requirements for low impact BES Cyber Systems -- the Low Impact External Routable Connectivity (LERC) modifications and requirements for Transient Cyber Assets (TCAs) used at assets containing low impact BES Cyber Systems. The LERC modifications have a regulatory filing deadline of March 31, 2017. Through outreach, stakeholders have expressed a preference for the SDT to consolidate, as much as possible, proposed changes to the standards that pertain to assets containing low impact BES Cyber Systems and to do so expeditiously. The consolidation would foster stability in the low impact requirements and enable efficient implementation of the requirements which is important given the volume of in-scope assets and the work currently underway for CIP-003-6. Consequently, the SDT and NERC staff are exploring opportunities to accomplish this objective.

This informal posting of the draft CIP-003 TCA requirements is the first step in reaching that goal by providing the SDT with valuable feedback from stakeholders that will permit the SDT to discuss and make recommended revisions to the draft TCA language prior to the conclusion of the second posting and ballot of the LERC modifications (ending December 5, 2016).

The SDT is posting the draft TCA requirements for informal comment during the formal posting period of the LERC modifications. (Note: the TCA proposal uses a subset of the language from the CIP-010 TCA requirements commensurate with the risk associated at low impact. The CIP-003 language is consistent with the existing language for Medium and High Impact BES Cyber Systems to enable a common understanding of the requirements particularly for those entities implementing a plan to cover high, medium and low impact). The SDT will use the stakeholder feedback from this informal posting of the TCA revisions to determine the next steps.

Receiving thoughtful and constructive feedback from stakeholders is critical to the success of this plan. Submitting comments in advance of the deadline is welcome. The SDT thanks you for your participation.

**Questions**

1. If this were a formal posting, would your entity vote to approve the TCA definition, requirement language, and implementation plan as written?

Yes:

No:

Comments:

1. Definition: The SDT revised the definition of Transient Cyber Asset (TCA) such that it is relevant to the controls required for high impact, medium impact, and low impact BES Cyber Systems. Do you agree with these changes? If not, please provide the basis for your disagreement and an alternate proposal.

Yes:

No:

Comments:

1. Requirement R2: The SDT revised CIP-003-TCA, Attachment 1, adding Section 5 Transient Cyber Assets and Removable Media Malicious Code Mitigation Plan(s) to reflect the mandatory requirement for the Responsible Entity to develop and implement security plans to provide higher assurance against the propagation of malware from transient devices. Do you agree with these revisions? If not, please provide the basis for your disagreement and an alternate proposal.

Yes:

No:

Comments:

1. Attachment 2: The SDT revised the measures language of CIP-003-TCA, Attachment 2, Section 5 to make the evidential language consistent with the requirement language. Do you agree with these revisions? If not, please provide the basis for your disagreement and an alternate proposal.

Yes:

No:

Comments:

1. Guidelines and Technical Basis: The SDT revised the Guidelines and Technical Basis (GTB) section of the standard to reflect the changes made to Requirement R2. The GTB provides support for the technical merits of the requirement and provides examples of temporarily connected devices, and strategies to consider in developing the Transient Cyber Asset and Removable Media malicious code mitigation plan(s) at a conceptual level. Do you agree with the content of the GTB? If not, please provide the basis for your disagreement and alternate or additional proposal(s) for SDT consideration.

Yes:

No:

Comments:

1. Implementation Plan: The SDT revised the Implementation Plan such that it establishes a single effective (compliance) date for the requirements in Section 5 of Attachment 1 in CIP-003-TCA, which will be the later of September 1, 2018 or the first day of the first calendar quarter that is twelve (12) calendar months after the effective date of the applicable governmental authority’s order approving the standard and NERC Glossary term, or as otherwise provided for by the applicable governmental authority. Do you agree with this proposal? If you agree with the proposed implementation time period, please note the actions you will undertake that necessitate this amount of time to complete. If you think an alternate implementation time period is needed – shorter or longer - please propose an alternate implementation plan and provide a detailed explanation of actions and time needed to meet the implementation deadline.

Yes:

No:

Comments:

1. If you have additional comments on the proposed revisions to address the FERC directive regarding TCAs for low impact BES Cyber Systems that you have **not** provided in response to the questions above, please provide them here.

Comments: