

~~Note: A valid interpretation request is one that requests additional clarity about one or more requirements in approved NERC reliability standards, but does not request approval as to how to comply with one or more requirements.~~

When completed, email this form to:
laura.hussey@nerc.net
 For questions about this form or for assistance in completing the form, call Laura Hussey at 404-446-2579.

~~Response to a Request for an Interpretation of a Reliability Standard CIP-003-3 for Consumers Energy~~

Date submitted: June 9, 2011

~~Contact information for person requesting the interpretation:~~

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Identify the standard that needs clarification:

Standard Number (include version number, e.g. PRC-001-1): CIP-003-3

Standard Title: Cyber Security – Security Management Controls

Identify specifically what requirement needs clarification:

Requirement Number and Text of Requirement: R2. Leadership — The Responsible Entity shall assign a single senior manager with overall responsibility and authority for leading and managing the entity’s implementation of, and adherence to, Standards CIP-002-3 through CIP-009-3.

Identify the nature of clarification that is requested: (Check as many as applicable)

- Clarify the required performance
- Clarify the conditions under which the performance is required
- Clarify which functional entity is responsible for performing an action in a requirement
- Clarify the reliability outcome the requirement is intended to produce

Please explain the clarification needed: Section 4.1 of CIP-003-3, “Applicability” specifies that a “Responsible Entity” shall mean...”, and lists several functions. If one substitutes any of these functions for the term “Responsible Entity”, it would appear that there could be a different Senior Manager for each function to which that entity is registered. With regard to CIP-003-3,

R2 can a Registered Entity assign different CIP Senior Managers for different applicable functions for which it is registered? (If so, a Registered Entity could have more than one CIP senior manager, but each Responsible Entity would have a single CIP senior manager.)

Identify the material impact associated with this interpretation:

Identify the material impact to your organization or others, if known, caused by the lack of clarity or an incorrect interpretation of this standard.

An incorrect interpretation of the standard may impact an organization’s CIP compliance structure.

Question

Consumers Energy Corporation seeks clarification on the meaning of CIP-003-3, Requirement R3 as it relates to designating a CIP Senior Manager.

In its response, the Interpretation Drafting Team will answer whether a Registered Entity may assign different CIP Senior Managers for different applicable functions for which it is registered.

Response

~~No, a Registered Entity cannot assign different CIP Senior Managers for different applicable functions for which it is registered.~~ A Registered Entity cannot assign different CIP Senior Managers for different applicable functions if those functions are included under one registration (NERC ID).

Organizational Registration is a process defined in the NERC Rules of Procedure undertaken by NERC and Regional Entities to identify which entities are responsible for reliability functions within the Regional Entity’s Region. Within the NERC Rules of Procedure a “Registered Entity” means an owner, operator, or user of the Bulk Power System, or the entity registered as its designee for the purpose of compliance, that is included in the NERC Compliance Registry. The Rules of Procedure further clarify that a “Responsible Entity” means an entity that is registered for a reliability function in the NERC Compliance Registry and is responsible for complying with an Applicable Requirement, as specified in the “Applicability” section of the CIP Standard.

The number of NERC CIP Senior Managers depends on how the entity registers and appears in the Compliance Registry. Each Registered Entity, even if registered as performing multiple registration functions, shall assign a single CIP Senior Manager. If a single company has multiple Registered Entities (i.e. company has registered one business segment as a GO/GOP, and another business segment registered as TO/TOP) it could assign a CIP Senior Manager to each Registered Entity, but that would not preclude the entity from assigning a single senior manager to both Registered Entities. Similarly, if the same single company has only one NERC ID, i.e. the entity is registered once for its GO/GOP and TO/TOP collectively, the entity assigns one CIP Senior Manager.

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