

DRAFT Notes

Project 2014-02 Standard Drafting Team

July 29, 2014 | 9:00 a.m.–5:00 p.m. Central

July 30, 2014 | 9:00 a.m.–5:00 p.m. Central

July 31, 2014 | 9:00 a.m.–5:00 p.m. Central

Midwest Reliability Organization (MRO)
380 St. Peter Street, Suite 800
St. Paul, MN

Meeting Objectives

- Discuss the comments from the first comment period
- Develop possible approaches in revising CIP-003-6 and CIP-010-2

Tuesday, July 29

1. **Welcome and Introductions**

Safety and other administrative items were covered by MRO staff.

Dan Skaar, President and CEO of the Midwest Reliability Organization (MRO) welcomed the Standard Drafting Team (SDT) and observers.

Steven Noess, Associate Director of Standards Development at NERC, gave an overview of the ballot results and thanked the SDT and observers for their work thus far. RSAWs, transition guidance, and other areas were provided as an overview.

2. **NERC Antitrust Guidelines and Public Meeting Notice**

The NERC Antitrust Guidelines and Public Meeting Notice were read.

3. **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. All ten SDT members were in attendance.

4. **Review Agenda and Meeting Objectives**

5. **Low Impact (CIP-003-6)**

The SDT discussed the comments surrounding CIP-003-6. To begin, the topic of placement was discussed. From the comments received, many commenters suggested to distribute the Requirement R2 requirement parts into the related medium and high impact areas (CIP-004, CIP-005, CIP-006, and CIP-008), while other commenters supported keeping the low impact requirements within CIP-003.

The focus of the placement discussion was that industry-approved CIP-003-5, Requirement R2 was at a policy level and the revisions include more technical areas.

The SDT weighed the costs and benefits of each of the following options:

- Distribute the requirements within the related medium and high impact standards.
- Keep the requirements within CIP-003-6.
- Move the requirements to a brand new CIP-012-1.
- Option to allow Registered Entities to tailor their programs.

The SDT then discussed comments to replace the phrase “containing low impact BES Cyber Systems” with a reference to CIP-002-5.1. The SDT noted that versioning within a requirement is not good practice since the standard may change and make the requirement language obsolete. For instance, the SDT made the change for the first posting to the parent requirement of CIP-003-6 Requirement R2 to clearly state what CIP-002-5.1 is without directly referencing the standard. In response to the comment, the SDT modified the parent requirement of R2 to include the reference back to CIP-002 without the version number. There was also discussion as to if “Each Responsible Entity for its assets...” should be changed to “Each Responsible Entity for the assets...” The SDT took an action item to review the language of the requirement to ensure the intent is accurate as it ties back to CIP-002.

The SDT discussed comments on the “Applicable Systems” column within the table for CIP-003-6 Requirement R2. A suggestion was made to strike or modify the column. Another suggestion was to change the header to read, “Applicable Assets Containing” or “Applicability.” The SDT reviewed several language options to make this clearer.

The SDT discussed comments suggesting that part 2.6 should be modified to change “quarterly” to “15 calendar months” and provided suggested revisions. The SDT also discussed whether to combine the security awareness with the training program in CIP-004 and to provide more detail as to who should be the focus of the awareness or training. In responding to the comments, the SDT reviewed CIP-004 in order to not confuse the security awareness program with a training program. The SDT determined to address the comments in guidance.

The SDT discussed comments on electronic access controls for low impact. The SDT considered how to clarify “external routable protocol paths” to demonstrate what external means. The SDT looked to the definitions for External Routable Connectivity and Electronic Access Point but did not want to pull in the ESP concept for lows.

Wednesday, July 30

6. Low Impact (CIP-003-6) (cont.)

The SDT reviewed a proposal for a CIP-012-1 to address the placement concerns in comments and to revise the language according to comments. The revised language focused on ensuring that the paths were focused on traffic to the systems at the assets rather than applying the controls to those assets with systems but no traffic from the systems external to the asset.

The SDT considered creating an attachment for lows instead of CIP-012-1.

7. Transient Devices (CIP-010-2)

The SDT discussed comments on transient devices language in CIP-010. Commenters asked for clarity on “acceptable use.” The SDT discussed that it could be determined by entities and was intended to encompass

some authorizations mentioned in FERC Order No. 791 for the SDT's consideration, such as software authorization. The SDT determined it should develop guidance on what constitutes acceptable use. The SDT also discussed comments on protections applied to vendor-owned devices and whether patching should be used for all Transient Cyber Assets.

The SDT developed a proposal to separate controls by entity-owned versus vendor-owned Transient Cyber Assets and by Removable Media. The proposal was placed in an attachment that had elements to be included in a plan to manage Transient Cyber Assets and Removable Media.

8. **Definitions**

The SDT reviewed comments on the definitions.

Thursday, July 31

9. **Implementation Plan**

The SDT addressed comments on the Implementation Plan. The SDT determined that a phased plan for lows requirements would be more appropriate. The compliance dates would be extended for the physical access and electronic access controls.

10. **Communication Networks**

The SDT reviewed comments on the revisions to address the communication networks directive. The SDT determined that additional guidance should be developed to address comments on third-party nonprogrammable devices.

11. **Identify, Assess, and Correct**

The SDT reviewed comments on the removal of the identify, assess, and correct language. The SDT determined that it would continue coordination with NERC compliance and enforcement staff to address Reliability Assurance Initiative concerns, and NERC should continue to conduct outreach.

12. **Review of Action Items**

The SDT reviewed action items developed during the meeting.

13. **Planning for Outreach, Webinars, Full Team Calls, etc.**

The SDT discussed options for posting a version X with only IAC removed and without the lows and transient devices language in order to meet the directive deadline for IAC and communication networks.

14. **Future Meeting Schedules and Venues**

- a. August 19-21, 2014 – Pacific Gas & Electric (PG&E) – *San Francisco, CA* ([Register](#))
- b. October 21-23, 2014 (TBD – tentative depending on posting)

15. **Adjourn**