

# Implementation Plan

## Project 2016-02 Modifications to CIP Standards Reliability Standard CIP-003-7 Security Management Controls and Low Impact External Routable Communication (LERC)

### Requested Approvals

- Reliability Standard CIP-003-7 - Cyber Security – Security Management Controls
- ~~Definition of Low Impact External Routable Communication (LERC)~~

### Requested Retirements

- Reliability Standard CIP-003-6 - Cyber Security – Security Management Controls
- Definition Low Impact BES Cyber System Electronic Access Point (LEAP)
- Definition of Low Impact External Routable Connectivity (LERC)

### Applicable Entities

- Balancing Authority
- Distribution Provider
- Generator Operator
- Generator Owner
- Interchange Coordinator or Interchange Authority
- Reliability Coordinator
- Transmission Operator
- Transmission Owner

### Background

On January 21, 2016, the Federal Energy Regulatory Commission (Commission) issued [Order No. 822](#), *Revised Critical Infrastructure Protection Reliability Standards*, approving seven Critical Infrastructure Protection (CIP) Reliability Standards and new or modified definitions. In addition to approving the seven CIP Reliability Standards, the Commission, among other things, directed NERC to modify the definition of LERC. The Commission stated:

73. Based on the comments received in response to the NOPR, the Commission concludes that a modification to the Low Impact External Routable Connectivity definition to reflect the commentary in the Guidelines and Technical Basis section of CIP-003-6 is necessary to provide needed clarity to the definition and eliminate ambiguity surrounding the term “direct” as it is used in the proposed definition. Therefore, pursuant to section 215(d)(5) of the FPA, we direct NERC to develop a modification to provide the needed clarity, within one year of the effective date of this Final Rule. We agree with NERC and other commenters that a suitable means to address our concern is to modify the Low Impact External Routable Connectivity

definition consistent with the commentary in the Guidelines and Technical Basis section of CIP-003-6.

~~In addition~~As an alternative to modifying the definition consistent with the Commission's directive, the standard drafting team ~~revised the term "LERC" by replacing the word "connectivity" with the word "communication" such that the proposed term for inclusion in the Glossary of Terms used in NERC Reliability Standards (NERC Glossary) is "Low Impact External Routable Communication."~~retired the term "LERC" and incorporated the LERC concepts within the requirement language.

Given the ~~modified-proposed retirement of the LERC~~ definition ~~of LERC~~ and the proposed modifications in Reliability Standard CIP-003-7, there is no longer a need for the NERC Glossary term Low Impact BES Cyber System Electronic Access Point (LEAP). Consequently, NERC is proposing to retire the term LEAP.

## General Considerations

~~This Implementation Plan does not modify the~~The effective date for dates or phased-in compliance dates within the CIP-003-6 ~~in the Implementation Plan associated with CIP-003-6 nor any of,~~remain in effect except that the ~~phased-in~~ compliance dates for CIP-003-6, Requirement R2, Attachment 1, Sections 2 and 3 shall be replaced with the effective date of CIP-003-7.

The Responsible Entity shall not be required to include in its cyber security plan(s) elements related to Sections 2 and 3 of Attachment 1 until the effective date of CIP-003-7. Upon the effective date of CIP-003-7, the Responsible Entity's cyber security plan(s) must include the elements required by Sections 2 and 3 of Attachment 1 and the Responsible Entity must implement the controls included therein in its plan to meet the objectives of Sections 2 and 3.

## Effective Date

The effective date for the proposed Reliability Standard ~~and NERC Glossary term~~ is provided below:

Where approval by an applicable governmental authority is required, Reliability Standard CIP-003-7 ~~and the NERC Glossary term Low Impact External Routable Communication (LERC)~~ shall become effective on the later of September 1, 2018 or the first day of the first calendar quarter that is ~~nine~~ nine (12) calendar months after the effective date of the applicable governmental authority's order approving the standard, or as otherwise provided for by the applicable governmental authority.

Where approval by an applicable governmental authority is not required, Reliability Standard CIP-003-7 ~~and the NERC Glossary term Low Impact External Routable Communication (LERC)~~ shall become effective on the first day of the first calendar quarter that is ~~nine~~ nine (12) calendar months after the date the standard is adopted by the NERC Board of Trustees, or as otherwise provided for in that jurisdiction.

## Planned or Unplanned Changes

**Planned or Unplanned Changes Resulting in a Higher Categorization** – This implementation Plan incorporates by reference the section in the [Implementation Plan](#) associated with CIP-003-5 titled Planned or Unplanned Changes Resulting in a Higher Categorization.<sup>1</sup>

**Unplanned Changes Resulting in Low Impact Categorization** – This implementation Plan incorporates by reference the section in the [Implementation Plan](#) associated with CIP-003-6 titled Unplanned Changes Resulting in Low Impact Categorization. That section provides:

For unplanned changes resulting in a low impact categorization where previously the asset containing BES Cyber Systems had no categorization, the Responsible Entity shall comply with all Requirements applicable to low impact BES Cyber Systems within 12 calendar months following the identification and categorization of the affected BES Cyber System.

## Retirement Date

### Reliability Standard CIP-003-6

Reliability Standard CIP-003-6 shall be retired immediately prior to the effective date of Reliability Standard CIP-003-7 in the particular jurisdiction in which the revised standard is becoming effective.

### Current NERC Glossary of Terms of LERC and LEAP

The current definition of LERC and the term LEAP shall be retired from the NERC Glossary of Terms immediately prior to the effective date of ~~the revised LERC term~~ [CIP-003-7](#) in the particular jurisdiction in which the definition is becoming effective.

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<sup>1</sup> Due to the length of that section, it is not reproduced herein.