Implementation Plan
Project 2016-02 Modifications to CIP Standards
Reliability Standard CIP-003-TCA Security Management Controls
(Transient Cyber Assets used at low impact BES Cyber Systems)

Requested Approvals
- Reliability Standard CIP-003-TCA – Cyber Security – Security Management Controls
- Definition of Transient Cyber Asset (TCA)

Requested Retirements
- Reliability Standard CIP-003-6 – Cyber Security – Security Management Controls
- Definition of Transient Cyber Asset (TCA)

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 “…develop modifications to the CIP Reliability Standards to provide mandatory protection for transient devices used at Low Impact BES Cyber Systems...”. The Commission stated:

32. After consideration of the comments received on this issue, we conclude that the adoption of controls for transient devices used at Low Impact BES Cyber Systems, including Low Impact Control Centers, will provide an important enhancement to the security posture of the bulk electric system by reinforcing the defense-in-depth nature of the CIP Reliability Standards at all impact levels. Accordingly, we direct that NERC, pursuant to section 215(d)(5) of the FPA, develop modifications to the CIP Reliability Standards to provide mandatory protection for transient devices used at Low Impact BES Cyber Systems based on the risk posed to bulk electric system reliability. While NERC has flexibility in the manner in which it addresses the Commission’s concerns,
the proposed modifications should be designed to effectively address the risks posed by transient devices to Low Impact BES Cyber Systems in a manner that is consistent with the risk-based approach reflected in the CIP version 5 Standards.

**General Considerations**
This Implementation Plan does not modify the effective date for CIP-003-6 in the Implementation Plan associated with CIP-003-6 nor any of the phased-in compliance dates included therein.

**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-TCA shall become effective on 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.

Where approval by an applicable governmental authority is not required, Reliability Standard CIP-003-TCA shall become effective on the first day of the first calendar quarter that is twelve (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.¹

**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.

¹ Due to the length of that section, it is not reproduced herein.
**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-TCA in the particular jurisdiction in which the revised standard is becoming effective.

**Current NERC Glossary of Terms Definition of TCA**

The current definition of TCA shall be retired from the NERC Glossary of Terms immediately prior to the effective date of Reliability Standard CIP-003-TCA in the particular jurisdiction in which the revised standard is becoming effective.