

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Planned and Unplanned Changes Language Webinar

Modifications to the CIP Standards

Project 2016-02 CIP SDT
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RELIABILITY | ACCOUNTABILITY



It is NERC's policy and practice to obey the antitrust laws and to avoid all conduct that unreasonably restrains competition. This policy requires the avoidance of any conduct that violates, or that might appear to violate, the antitrust laws. Among other things, the antitrust laws forbid any agreement between or among competitors regarding prices, availability of service, product design, terms of sale, division of markets, allocation of customers, or any other activity that unreasonably restrains competition.

- Background
- Planned and Unplanned Change Language
 - CIP-002
 - CIP-012

- The Planned and Unplanned Change language is being moved from the implementation plan to the standard.
- Importance of the Planned and Unplanned Change language

- Do you agree with the Planned and Unplanned Change Language being moved from the Implementation Plan to the standard?
 - Yes
 - No

- Planned Changes refer to changes to the Bulk Electric System or Cyber Asset(s) that were planned and implemented by the Responsible Entity or with the Responsible Entity's awareness. Planned Changes typically involve a change to a Bulk Electric System asset (e.g., substation, generating resource, Control Center) or a change to a Cyber Asset that was foreseen by the Responsible Entity. Examples of Planned Changes include: (1) placing a new transmission substation into service or adding a new line to an existing substation; (2) placing a new BES generation resource into service or adding a generation resource to an existing plant; (3) placing a new primary or backup Control Center or associated data center into service or implementing a new supervisory control and data acquisition (SCADA) system or energy management system (EMS) or an upgrade to an existing SCADA system or EMS; (4) implementing a project for substation automation where Cyber Assets are installed, upgraded, or replaced such as electromechanical relays being replaced with digital relays; or (5) implementing a control system upgrade at a generating resource.

- Unplanned Changes refer to (i) any changes to the Bulk Electric System or a Cyber Asset that occur without the entity's awareness or (ii) changes to the categorization of a Cyber Asset caused by a notification from another entity or the output of a planning study. Examples of Unplanned Changes include: (1) when a Responsible Entity is notified (internally or externally) that a generation Facility has been designated as necessary to avoid an Adverse Reliability Impact in the planning horizon of more than one year (CIP-002, Attachment 1, Criterion 2.3); (2) when a Responsible Entity is notified (internally or externally) that a generation or Transmission Facility has been identified as critical to the derivation of an IROL and their associated contingencies (CIP-002, Attachment 1, Criterion 2.6); (3) when a generating resource that is connected at less than 100kV is designated as a new Blackstart Resource along with its Cranking Path (CIP-002, Attachment 1, Criterion 3.4); or (4) when a system study that shows changes in customer load have resulted in crossing the 300 MW threshold of a load shedding system as described in Criterion 2.10 of CIP-002, Attachment 1.

- **Planned and Unplanned Changes:** If a Responsible Entity has a Planned Change or Unplanned Change, the Responsible Entity shall comply with the requirements in this Reliability Standard in accordance with the following:
- For Planned Changes resulting in a new BES Cyber System or a change in categorization for an existing BES Cyber System, the Responsible Entity shall comply with all newly applicable requirements in this Reliability Standard upon the in-service date of the Planned Change. For this provision, the in-service date is the date a new or modified Bulk Electric System asset or Cyber Asset is placed in service or is capable of operating the BES. For requirements that contain periodic obligations, initial performance of those obligations following a Planned Change shall occur within the first period following the in-service date of the Planned Change.

- For Unplanned Changes, the Responsible Entity shall comply with all newly applicable requirements in this Reliability Standard according to the timelines in the table below. As used in the table, the phrase “BES asset type” refers to the following BES asset types listed in Requirement R1 of CIP-002: (i) Control Centers or backup Control Centers; (ii) Transmission stations or substations; (iii) generation resources; (iv) systems and facilities critical to system restoration including Blackstart Resources and Cranking Paths and initial switching requirements; (v) Special Protection Systems that support the reliable operation of the Bulk Electric System; and (vi) the Distribution Provider Protection Systems specified in Applicability section 4.2.1.

Scenario of Unplanned Change	Implementation Period
New high impact BES Cyber System associated with a BES asset type where the Responsible Entity has previously identified a medium or high impact BES Cyber System associated with that same BES asset type	12 calendar months from the date of notification or detection of the Unplanned Change.
New high impact BES Cyber System associated with a BES asset type where the Responsible Entity has not previously identified a medium or high impact BES Cyber System associated with that same BES asset type	24 calendar months from the date of notification or detection of the Unplanned Change.
New medium impact BES Cyber System associated with a BES asset type where the Responsible Entity has previously identified a medium or high impact BES Cyber System associated with that same BES asset type	12 calendar months from the date of notification or detection of the Unplanned Change.
New medium impact BES Cyber System associated with a BES asset type where the Responsible Entity has not previously identified a medium or high impact BES Cyber System associated with that same BES asset type	24 calendar months from the date of notification or detection of the Unplanned Change.
New low impact BES Cyber System associated with a BES asset type where the Responsible Entity has previously identified a low, medium, or high impact BES Cyber Systems associated with that same BES asset type	12 calendar months from the date of notification or detection of the Unplanned Change.
New low impact BES Cyber System associated with a BES asset type where the Responsible Entity has not previously identified a low, medium, or high impact BES Cyber systems associated with that same BES asset type	24 calendar months from the date of notification or detection of the Unplanned Change.

- For requirements that contain periodic obligations, initial performance of those obligations following an Unplanned Change shall occur within the first period following the date that the Implementation Period ends, as defined in the table above, except that the Responsible Entity shall initially perform Requirement R1 Part 2.2 of Requirement R2 by the date the Implementation Period ends where the Unplanned Change results in a high or medium impact BES Cyber System and the Responsible Entity previously had neither a high nor a medium impact BES Cyber System.

For Unplanned Changes resulting in a higher categorization for an existing BES Cyber System, the Responsible Entity shall continue to comply with the applicable requirements of the prior categorization during the Implementation Period defined above.

- Do you agree with the Planned and Unplanned Change Language in CIP-002? If no, please provide a comment in the chat box as to why this language is needed.
 - Yes
 - No

- The SDT decided not to go with adding Planned and Unplanned Change Language to CIP-012.

- Do you agree with not having Planned and Unplanned Change Language added to CIP-012? If no, please provide a comment in the chat box as to why this language is needed.
 - Yes
 - No



Questions and Answers