

Meeting Notes Project 2009-26 Interpretation of CIP-004-1 for WECC

October 14, 2011 | 2:00–4:00 p.m. ET
Teleconference and Webinar

Administrative

1. **Participants were read the NERC Compliance Guidelines; there were no questions**
2. **Attendance and quorum**
 - a. Members: Tim Conway, NIPSCO; Marc Child, Great River Energy; Matthew Davis, SERC; David Dunn, Ontario IESO; Amanda Mullenix, Duke Energy; Clayton Stooshnoff, FortisBC; Steven Noess, NERC Staff
 - b. Observers: David Dockery, AECl; Jeffrey Fuller, DPL/Dayton Power and Light; Trevor MacCrae, Southern Company Transmission; Michael Mertz, PNM Resources

Summary

1. **Issues and Discussion**
 - a. To frame the discussion for analyzing the request for interpretation (RFI) from WECC, the team focused on what “clarification is needed” from the RFI within the context of types of authorizations under the requirement language in CIP-004. Specifically, the types of authorizations referenced are for either “cyber” or “unescorted physical” access. The team agreed that it seems clear that there is a means and a basis in the standard language for escorted physical access, but there is no guidance within the 4 corners of the standard with regard to a “cyber escort,” either in a directive, in FERC Order No. 706, or from any other NERC documentation.
 - b. Upon focusing attention to the cyber access components of the standard, the team discussed whether the standard provides for “escorted” cyber access equivalent to physical access and determined that there is no basis for such a conclusion in the standard. Compared to “physical access,” the concept or any words relating to “escorting” in the standard is conspicuously absent relative to cyber access. The team noted that the FAQ referenced in the RFI is not a reliability standard and is not mandatory and enforceable, nor is it developed through the standards development process. Additionally, the concept of unsupervised trusted access discussed in the FAQ only applies for implementation of Version 1, not subsequent versions.
 - c. The RFI also requested clarification on the concept of “supervised” vendors, and whether “escorted physical access” is acceptable. To the extent a vendor is escorted to physically access

a Critical Cyber Asset for purposes other than direct cyber access (e.g., replacing parts on the Critical Cyber Asset), supervision is acceptable (within the context of escorted physical access). If the escorted physical access includes bringing a vendor or other individual to the Critical Cyber Asset to direct someone with authorized access in performing cyber access, such supervision is also acceptable within the language of the requirement, since the vendor or other individual is merely present while an authorized individual conducts the actual cyber access. However, the requirement language does not support the notion of physically escorting a vendor or other individual to a Critical Cyber Asset for the vendor or other individual to perform cyber access, even if supervised.

- d. The members prepared the interpretation and plan to turn toward addressing comments and preparing the comment form for the next posted comment period.
- e. The drafting team also discussed that it is limited in its response to a request for interpretation to the clarification of meaning. The team must consider the request for interpretation within the confines of the NERC “Guidelines for Interpretation Drafting Teams,” and it realizes that in some cases, some entities may not desire the outcome of this interpretation. However, it is not the role of an interpretation drafting team to address a perceived reliability gap (the team does not suggest that there is or is not a reliability gap), through an interpretation. The team understands that some may disagree with the outcome of this interpretation, and it notes that the greater standards development process is better equipped to address those concerns, if any (and the team noted the continuing work underway by the CSO706 Standards Drafting Team in preparing Version 5 of the CIP standards). Revising a standard is outside the scope of the “Guidelines for Interpretation Drafting Teams” that “[a]n interpretation may only clarify or interpret the requirements of an approved Reliability Standard, . . .” Furthermore, an interpretation is limited and may not “address a gap or perceived weakness in the approved Reliability Standard[.]” As such, and pursuant to the “Guidelines for Interpretation Drafting Teams,” the drafting team is discussing whether to notify the NERC Standards Process Manager—without opinion on whether there is a gap or weakness—that there may be parties that believe a reliability gap or weakness remains in the approved Reliability Standard.

2. Action Items

- a. Review revision concepts and proposals and send via email comments, redline suggestions, and discussion ideas.
- b. Tim Conway, David Dunn, and Michael Mertz to work on developing strawman responses to comments in advance of the December 12, 2011 meeting.

3. Future Meetings

A meeting is scheduled for 1:00-3:00 p.m. ET, Monday, December 12, 2011.