

# Standard Authorization Request (SAR)

Complete and submit this form, with attachment(s) to the [NERC Help Desk](#). Upon entering the Captcha, please type in your contact information, and attach the SAR to your ticket. Once submitted, you will receive a confirmation number which you can use to track your request.

The North American Electric Reliability Corporation (NERC) welcomes suggestions to improve the reliability of the bulk power system through improved Reliability Standards.

## Requested information

SAR Title:	Modifications to CIP-002 Identification		
Date Submitted:	04/02/2025		
SAR Requester			
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## SAR Type (Check as many as apply)

<input type="checkbox"/> New Standard	<input type="checkbox"/> Imminent Action/ Confidential Issue (SPM Section 10)
<input checked="" type="checkbox"/> Revision to Existing Standard	<input type="checkbox"/> Variance development or revision
<input type="checkbox"/> Add, Modify or Retire a Glossary Term	<input type="checkbox"/> Other (Please specify)
<input type="checkbox"/> Withdraw/retire an Existing Standard	

## Justification for this proposed standard development project (Check all that apply to help NERC prioritize development)

<input type="checkbox"/> Regulatory Initiation	<input type="checkbox"/> NERC Standing Committee Identified
<input type="checkbox"/> Emerging Risk (Reliability Issues Steering Committee) Identified	<input type="checkbox"/> Enhanced Periodic Review Initiated
<input type="checkbox"/> Reliability Standard Development Plan	<input type="checkbox"/> Industry Stakeholder Identified

## What is the risk to the Bulk Electric System (What Bulk Electric System (BES) reliability benefit does the proposed project provide?):

The purpose of this project is to centralize the identification of Protected Cyber Assets (PCA), Electronic Access Control or Monitoring Systems (EACMS), and Physical Access Control Systems (PACS) as "CIP applicable" systems in a single standard, which will bring clarity to industry and regulators alike.

This is the second time NERC is submitting a SAR related to centralizing the identification of EACMS, PACS, and PCA. The first SAR was rejected by the Standards Committee in June 2024, "On the grounds that there is insufficient stakeholder support, lack of reliability benefit, and continued revisions of the SAR would not be productive." It is unclear from the [June 2024 Standards Committee meeting minutes](#) whether the Standards Committee knew the current practice of rolling up noncompliance associated with failure to identify EACMS, PACS, and PCA into a CIP-010 R1 noncompliance is a temporary regulatory practice until

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a permanent solution occurs via modification to CIP-002. If this SAR fails, the ERO Enterprise will cease rolling up such noncompliance and treat all noncompliance associated with failure to identify EACMS, PACS, or PCA as individual noncompliance. Please note, the failure to identify a PACS, PCA, or EACMS is currently not a violation of a CIP Standard Requirement. Rather, a registered entity's failure to identify a PACS, PCA, or EACMS may result in multiple violations of the Reliability Standards. Specifically, there are 28 requirements applicable to EACMS (87 sub requirements), 22 requirements applicable to PACS (63 sub requirements), and 14 requirements applicable to PCA (49 sub requirements).

This approach will ensure that all BES Cyber Systems' associated Cyber Assets are identified for the application of cyber security requirements commensurate with the adverse impact that loss, compromise, or misuse of those Cyber Assets could have on the reliable operation of the BES. The consideration, identification, and categorization of PCA, EACMS, and PACS within CIP standards supports appropriate protection against compromises. Without an accurate identification of such associated applicable EACMS, PACS, and PCA, registered entities may fail to deploy appropriate controls to these Cyber Assets, which could allow bad actors to compromise, misuse, or disrupt BES Cyber Systems in ways that could lead to misoperation or instability in the BES.

**Purpose or Goal (What are the reliability gap(s) or risk(s) to the Bulk Electric System being addressed, and how does this proposed project provide the reliability-related benefit described above?):**

Revision of CIP-002 language to include considerations for EACMS, PACS, and PCA, if compromised, pose a threat to their associated BES Cyber System by virtue of: (a) their location within the Electronic Security Perimeter (in the case of PCA), or (b) the security control function they perform (in the case of EACMS and PACS). This project will ensure the reliable operation of the BES by requiring the identification of these Cyber Assets so that the appropriate controls can be implemented.

**Project Scope (Define the parameters of the proposed project):**

This project will revise CIP-002 to include the identification and categorization of certain Cyber Assets (specifically EACMS, PACS, and PCA) associated with high and medium impact BES Cyber Systems.

**Detailed Description (Describe the proposed deliverable(s) with sufficient detail for a drafting team to execute the project. If you propose a new or substantially revised Reliability Standard or definition, provide: (1) a technical justification<sup>1</sup> of developing a new or revised Reliability Standard or definition, which includes a discussion of the risk and impact to reliability-of the BES, and (2) a technical foundation document (e.g., research paper) to guide development of the Standard or definition):**

Revise CIP-002 to include the identification of EACMS, PACS, and PCA so that a registered entity failing to appropriately identify such devices will be found to be noncompliant with CIP-002. Such an approach aligns with the existing practice in which a failure to identify a BES Cyber System results in a noncompliance under CIP-002 R1 and requires mitigation of any other missed Standards and Requirements for the missed BES Cyber System.

Currently, the ERO Enterprise addresses an entity that fails to appropriately identify EACMS, PACS, or PCA by finding the registered entity noncompliant solely with CIP-010 R1 and requiring the registered entity

<sup>1</sup> The NERC Rules of Procedure require a technical justification for new or substantially revised Reliability Standards. Please attach pertinent information to this form before submittal to NERC.

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to mitigate all other missed Standards and Requirements, despite there being no requirement to identify such devices under CIP-010 R1. This is a temporary regulatory practice until a permanent solution occurs via modification to CIP-002. If this SAR fails, the ERO Enterprise will address failures to identify these devices by finding the registered entity noncompliant and will address all relevant CIP standards applicable to EACMS, PACS, and PCA (i.e., CIP-004, CIP-005, CIP-006, CIP-007, CIP-008, CIP-009, CIP-010, CIP-011, and CIP-013). Such an approach could potentially result in multiple violations to address each EACMS, PACS, or PCA not identified by the registered entity. There are 28 requirements applicable to EACMS (87 sub requirements), 22 requirements applicable to PACS (63 sub requirements), and 14 requirements applicable to PCA (49 sub requirements).

Writing up separate noncompliance for all missed Standards and Requirements resulting from a failure to identify EACMS, PACS, or PCA would be an administrative burden on the industry and the ERO Enterprise. Addressing such situations through a single CIP-002 requirement will allow for a more efficient allocation of scarce resources.

Cost Impact Assessment, if known (Provide a paragraph describing the potential cost impacts associated with the proposed project):

Cost impact is unknown at this time. However, a question will be asked during the comment period to ensure cost aspects are considered.

Please describe any unique characteristics of the BES facilities that may be impacted by this proposed standard development project (e.g., Dispersed Generation Resources):

None.

To assist the NERC Standards Committee in appointing a drafting team with the appropriate members, please indicate to which Functional Entities the proposed standard(s) should apply (e.g., Transmission Operator, Reliability Coordinator, etc. See the NERC Rules of Procedure Appendix 5A:

Balancing Authority, Distribution Provider, Generator Operator, Generator Owner, Reliability Coordinator, Transmission Operator, Transmission Owner

Do you know of any consensus building activities<sup>2</sup> in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.

None.

Are there any related standards or SARs that should be assessed for impact as a result of this proposed project? If so, which standard(s) or project number(s)?

Project 2016-02 (virtualization – CIP-002-7 filed with FERC on 7/10/24), Project 2021-03 (CIP-002-8 filed with FERC on 12/20/24 and Phase 2 of Project 2021-03)

Are there alternatives (e.g., guidelines, white paper, alerts, etc.) that have been considered or could meet the objectives? If so, please list the alternatives with the benefits of using them.

None.

<sup>2</sup> Consensus building activities are occasionally conducted by NERC and/or project review teams. They typically are conducted to obtain industry inputs prior to proposing any standard development project to revise, or develop a standard or definition.

### Reliability Principles

Does this proposed standard development project support at least one of the following Reliability Principles ([Reliability Principles](#))? Please check all those that apply.

<input type="checkbox"/>	1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
<input type="checkbox"/>	2. The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.
<input type="checkbox"/>	3. Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.
<input type="checkbox"/>	4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained and implemented.
<input checked="" type="checkbox"/>	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems.
<input type="checkbox"/>	6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.
<input type="checkbox"/>	7. The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis.
<input checked="" type="checkbox"/>	8. Bulk power systems shall be protected from malicious physical or cyber attacks.

### Market Interface Principles

Does the proposed standard development project comply with all of the following [Market Interface Principles](#)?

	Enter (yes/no)
1. A reliability standard shall not give any market participant an unfair competitive advantage.	Yes
2. A reliability standard shall neither mandate nor prohibit any specific market structure.	Yes
3. A reliability standard shall not preclude market solutions to achieving compliance with that standard.	Yes
4. A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards.	Yes

### Identified Existing or Potential Regional or Interconnection Variances

Region(s)/ Interconnection	Explanation
e.g., NPCC	None.

## For Use by NERC Only

SAR Status Tracking (Check off as appropriate).	
<input type="checkbox"/> Draft SAR reviewed by NERC Staff <input type="checkbox"/> Draft SAR presented to SC for acceptance <input type="checkbox"/> DRAFT SAR approved for posting by the SC	<input type="checkbox"/> Final SAR endorsed by the SC <input type="checkbox"/> SAR assigned a Standards Project by NERC <input type="checkbox"/> SAR denied or proposed as Guidance document
Risk Tracking.	
<input type="checkbox"/> Grid Transformation <input type="checkbox"/> Resilience/Extreme Events <input type="checkbox"/> Security Risks	<input type="checkbox"/> Energy Policy <input type="checkbox"/> Critical Infrastructure Interdependencies

### Version History

Version	Date	Owner	Change Tracking
1	June 3, 2013		Revised
1	August 29, 2014	Standards Information Staff	Updated template
2	January 18, 2017	Standards Information Staff	Revised
2	June 28, 2017	Standards Information Staff	Updated template
3	February 22, 2019	Standards Information Staff	Added instructions to submit via Help Desk
4	February 25, 2020	Standards Information Staff	Updated template footer
5	August 14, 2023	Standards Development Staff	Updated template as part of Standards Process Stakeholder Engagement Group
6	June 4, 2023	Standards Information Staff	Updated link to the NERC Reliability Principles