

## Appendix 1

### Interpretation of CIP-002-5.1, Requirement R1, Attachment 1, Criterion 2.1

#### Requirement Number and Text of Requirement

##### CIP-002-5.1, Requirement R1

R1. Each Responsible Entity shall implement a process that considers each of the following assets for purposes of parts 1.1 through 1.3:

- i. Control Centers and backup Control Centers;
- ii. Transmission stations and 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. For Distribution Providers, Protection Systems specified in Applicability section 4.2.1 above.

- 1.1. Identify each of the high impact BES Cyber Systems according to Attachment 1, Section 1, if any, at each asset;
- 1.2. Identify each of the medium impact BES Cyber Systems according to Attachment 1, Section 2, if any, at each asset; and
- 1.3. Identify each asset that contains a low impact BES Cyber System according to Attachment 1, Section 3, if any (a discrete list of low impact BES Cyber Systems is not required).

##### Attachment 1, Criterion 2.1

#### 2. Medium Impact Rating (M)

Each BES Cyber System, not included in Section 1 above, associated with any of the following:

- 2.1. Commissioned generation, by each group of generating units at a single plant location, with an aggregate highest rated net Real Power capability of the preceding 12 calendar months equal to or exceeding 1500 MW in a single Interconnection. For each group of generating units, the only BES Cyber Systems that meet this criterion are those shared BES Cyber Systems that could, within 15 minutes, adversely impact the reliable operation of any combination of units that in aggregate equal or exceed 1500 MW in a single Interconnection.

## Questions

Energy Sector Security Consortium, Inc. (EnergySec) submitted a Request for Interpretation (RFI) seeking clarification of Criterion 2.1 of Attachment 1 in Reliability Standard CIP-002-5.1 regarding the use of the phrase “shared BES Cyber Systems.”

The Interpretation Drafting Team identified the following questions in the RFI:

1. Whether the phrase “shared BES Cyber Systems” means that the evaluation for Criterion 2.1 shall be performed individually for each discrete BES Cyber System at a single plant location, or collectively for groups of BES Cyber Systems?
2. Whether the phrase “shared BES Cyber Systems” refers to discrete BES Cyber Systems that are shared by multiple units, or groups of BES Cyber Systems that could collectively impact multiple units?
3. If the phrase applies collectively to groups of BES Cyber Systems, what criteria should be used to determine which BES Cyber Systems should be grouped for collective evaluation?

## Responses

### **Question 1: Whether the phrase “shared BES Cyber Systems,” means that the evaluation for Criterion 2.1 shall be performed individually for each discrete BES Cyber System at a single plant location, or collectively for groups of BES Cyber Systems?**

The evaluation as to whether a BES Cyber System is shared should be performed individually for each discrete BES Cyber System. In the standard language of CIP-002-5.1, there is no reference to or obligation to group BES Cyber Systems. Requirement R1, part 1.2 states “Identify *each* of the medium impact BES Cyber Systems according to Attachment 1, Section 2...” Further, the preamble of Section 2 of CIP-002-5.1 Attachment 1 states “*Each BES Cyber System...associated with any of the following [criteria].*” (emphasis added)

Additionally, the Background section of CIP-002-5.1 states that “[i]t is left up to the Responsible Entity to determine the level of granularity at which to identify a BES Cyber System within the qualifications in the definition of BES Cyber System.” The Background section also provides:

The Responsible Entity should take into consideration the operational environment and scope of management when defining the BES Cyber System boundary in order to maximize efficiency in secure operations. Defining the boundary too tightly may result in redundant paperwork and authorizations, while defining the boundary too broadly could make the secure operation of the BES Cyber System difficult to monitor and assess.

**Question 2: Whether the phrase “shared BES Cyber Systems” refers to discrete BES Cyber Systems that are shared by multiple units, or groups of BES Cyber Systems that could collectively impact multiple units?**

The phrase “shared BES Cyber Systems” refers to discrete BES Cyber Systems that are shared by multiple generation units.

The use of the term “shared” is also clarified in the NERC Frequently Asked Questions (FAQ) document issued by NERC Compliance to support implementation of the CIP Reliability Standards. FAQ #49 provides:

Shared BES Cyber Systems are those that are associated with any combination of units in a single Interconnection, as referenced in CIP-002-5.1, Attachment 1, impact rating criteria 2.1 and 2.2. For criterion 2.1 “BES Cyber Systems that could, within 15 minutes, adversely impact the reliable operation of any combination of units that in aggregate equal or exceed 1500 MW in a single Interconnection.” For criterion 2.2: “BES Cyber Systems that could, within 15 minutes, adversely impact the reliable operation of any combination of resources that in aggregate equal or exceed 1000 MVAR. Also refer to the Lesson Learned for CIP-002-5.1 Requirement R1: **Impact Rating of Generation Resource Shared BES Cyber Systems** for further information and examples.

**Question 3: If the phrase applies collectively to groups of BES Cyber Systems, what criteria should be used to determine which BES Cyber Systems should be grouped for collective evaluation?**

The phrase applies to each discrete BES Cyber System.