Project 2014-02 Standard Drafting Team Conference Calls Notes

Full Standard Drafting Team Call – May 1, 2014

The Standard Drafting Team (SDT) discussed low impact assets language in CIP-003, Requirement R2. The SDT determined that the processes within the four technical areas in Part 2.2 needed more detail to meet FERC's directive. For the physical access controls processes, the SDT included a requirement for all entities with low impact assets to implement a process that covered operational and procedural controls to restrict physical access. In addition, the SDT added a requirement for escorted visitor access at low impact control centers and added a requirement to monitor physical access points for low impact control centers with external routable protocol connection paths. The SDT determined that these additional requirement subparts for control centers address the concern that some low impact assets may need more protection. For electronic access controls, the SDT determined that these requirements apply to those low impact BES Cyber Systems with external routable connectivity. By including these protections, the SDT addressed the concern that assets with external routable connectivity would need additional protections. Finally, the SDT determined that putting the requirement parts and subparts into a table format would improve the comprehensibility of the requirement while allowing all the parts applicable to low impact assets to remain in one requirement.

The SDT also discussed revisions to Requirement R4 of CIP-010-1 to address protections from risks from transient devices. The SDT removed Removable Media from the authorization of users requirement in Part 4.1. The SDT clarified the requirement in Part 4.5 to delete the language requiring a process because the parent Requirement R4 already requires implementation of a process. The SDT determined this would reduce redundant language. The SDT also simplified language in Part 4.6 to require entities to evaluate a Transient Cyber Asset prior to use rather than also requiring every 15 calendar months. The SDT discussed action items to develop guidance and revise measures for the most recent revisions.

Full Standard Drafting Team Call – May 5, 2014

The SDT discussed measures and guidance in CIP-003, Requirement R2. While reviewing the measures and guidance, the SDT determined that "external routable connections" should be clarified to be "external routable protocol paths." The SDT decided that this distinguishes the term from the glossary term of External Routable Connectivity as used in other CIP standards that apply to Medium and High Impact BES Cyber Systems and relate to Electronic Security Perimeters, which low impact BES Cyber Systems are not required to implement. The SDT will revise the requirement parts and relevant language in the guidance and measures in CIP-003, Requirement R2 to state "external routable protocol paths."

Full Standard Drafting Team Call – May 6, 2014

The SDT reviewed the implementation plan and associated chart which summarizes the key compliance dates within the implementation plan. The SDT did not finalize the implementation plan on this call and still had areas to address. A question was asked regarding whether the proposed CIP-003-6 Requirement R2 requirement parts could have different compliance dates associated with them and it was discussed that the Implementation Plan can be written to allow for this flexibility, as shown in the CIP Version 5 Implementation Plan. The new or modified glossary terms' effective dates were modified to mirror the compliance dates of CIP-010-2 (the definitions reside within CIP-010-2). As follow up work, the newly added language was to be tightened up as necessary and the following areas addressed (see the CIP Version 5 Implementation Plan as an example):

- o Reason and rationale for selecting the effective date and implementation period for each standard, requirement, or requirement part
- o Planned or unplanned changes resulting in a higher categorization
- o Initial performance of certain periodic requirements

Full Standard Drafting Team Call – May 8, 2014

The SDT reviewed guidance language for the transient devices revisions. The SDT discussed other supplemental documents that would be finalized at the face-to-face meeting in Columbus, OH.

Full Standard Drafting Team Call – May 21, 2014

The SDT reviewed the draft standards to finalize for submittal to the Standards Committee (SC) at least 5 business days prior to the SC's May 30th call to authorize the standards' posting for an initial 45-day stakeholder comment period. When reviewing CIP-003-6, Requirement R2, the SDT determined that the requirement Part 2.2 on physical access controls for low impact assets should be split into two requirement parts. The SDT reasoned that some of the requirement parts applied to low impact BES Cyber Systems at Control Centers and that the language should be in the applicability column of the chart rather than in the requirement part language. Therefore, the SDT split Part 2.2 into Part 2.2, which would be applicable to Low Impact BES Cyber Systems in the applicability column, and into Part 2.3, which would be applicable to Low Impact BES Cyber Systems at Control Centers in the applicability column. The SDT determined that the standards were ready to be submitted to the SC.