

# **Standards Announcement**

Project 2008-06 Cyber Security Order 706 Version 5 CIP

Formal Comment Period Now Open: September 11, 2012 - October 10, 2012

## Upcoming:

Twelve Successive Ballot Windows Open for Ten Standards, Implementation Plan and Definitions: October 1, 2012 – October 10, 2012

#### **Now Available**

Ten CIP standards (CIP-002-5 through CIP-009-5, CIP-010-1, and CIP-011-1), a set of new and revised NERC Glossary definitions, and a proposed implementation plan have been posted for a formal 30-day comment period through **8 p.m. Eastern on Wednesday, October 10, 2012**.

CIP-002-5 requires the categorization of BES Cyber Systems according to bright-line criteria for the application of cyber security requirements commensurate with the adverse impact that loss, compromise, or misuse of those BES Cyber Systems could have on the reliable operation of the BES.

CIP-003-5 through CIP-009-5, CIP-010-1 and CIP-011-1 in the draft Version 5 CIP Cyber Security Standards define the cyber security requirements to be applied to the BES Cyber Systems according to the categorization performed in CIP-002-5.

CIP-003 through CIP-009 generally follows the organization of Versions 1-4 of CIP-003 through CIP-009. CIP-010-1 is a new standard that contains the Configuration Change Management and Vulnerability Assessment requirements previously defined across several CIP standards in Versions 1 through 4. CIP-011-1 is a new standard that defines Information Protection requirements previously defined across many standards in Versions 1 through 4.

In addition, the following documents have been posted to assist stakeholders in their review:

• Consideration of Comments Reports A through D – Provides a summary of the modifications made to the proposed standards based on comments submitted during a formal comment period and successive ballots that ended May 21, 2012. Please note that because of the large volume of comments received, the Standards Committee has authorized the SDT to provide detailed summary responses to each question in lieu of providing individual responses to each comment. Report A provides a response for CIP-002 and CIP-003, Report B provides a response for CIP-004 through CIP-007, Report C provides a response for CIP-008 through CIP-011, and Report D provides a response for the Definitions and Implementation Plan. The SDT believes



that the summary responses address all of the comments received, and encourages stakeholders to carefully review the summary consideration in conjunction with the posted redlines. Mapping Document - Identifies each requirement in the already-approved Version 4 CIP standards and identifies how the requirement has been treated in the Version 5 CIP standards (which include CIP-002-5 through CIP-009-5 and CIP-010-1 and CIP-011-1).

- Clean versions of the approved versions of CIP-002-4 through CIP-009-4 these are posted because the extent of the changes to each of the standards makes a redline of the posted draft standards against the approved standards impractical.
- Unofficial comment form in Word format
- Consideration of Issues and Directives The consideration of issues and directives provides the FERC issues and directives related to the CIP project and the associated consideration by the drafting team.
- VRFs and VSLs for all standards The VRFs and VSLs for all of the standards have been
  consolidated into one document. The VSLs are still under development and the drafting team
  asks voters not to make their ballot decisions for the standards on the under development VSLs.
  A non-binding poll of the VRFs and VSLs will be conducted with the recirculation ballots of these
  standards.

Additionally, CIP-006-5 was drafted in conjunction with the development of the Reliability Standard Audit Worksheet (RSAW). The parallel development of these documents provided the opportunity for the drafting team to consider the compliance implications of the language in the family of CIP standards and to offer input into the language of the RSAW. The RSAW is posted for informal comments along with the standards.

## **Instructions for Commenting**

A formal comment period is open through **8 p.m. Eastern on Wednesday, October 10, 2012**. Please use this <u>electronic form</u> to submit comments. If you experience any difficulties in using the electronic form, please contact Monica Benson at <u>monica.benson@nerc.net</u>. An off-line, unofficial copy of the comment form is posted on the <u>project page</u>.

The SDT believes that the industry has made a significant investment in improving the CIP Version 5 standards, and the drafting team has done its best to be responsive to all inputs, recognizing that it is not possible to adopt every suggestion and also recognizing the considerable diversity of entities and assets to which the standards will apply. Therefore, please refrain from providing duplicates of detailed comments that have already been provided in response to draft 1 and draft 2 (instead, you may simply say "See comments on draft 2"). After reviewing the revised standards and other posted documents, please limit your comments in response to this posting to those topics or issues for which you believe a change is essential and without which you would not be willing to support the standards.



**Please read carefully:** All stakeholders with comments (both members of the ballot pool as well as other stakeholders, including groups such as trade associations and committees) must submit comments through the <u>electronic comment form</u>. During the ballot window, balloters who wish to submit comments with their ballot *may no longer enter comments on the balloting screen*, but may still enter the comments through the electronic comment form. Balloters who wish to express support for comments submitted by another entity or group will have an opportunity to enter that information and are not required to answer any other questions.

## **Next Steps**

Twelve successive ballots (one for each of the ten standards, one for the definitions, and one for the implementation plan associated with these standards) will be conducted beginning on Monday, October 1, 2012 through 8 p.m. Eastern on Wednesday, October 10, 2012.

#### **Background**

In 2008, FERC Order No. 706 directed the ERO to develop modifications to Version 1 of the NERC CIP Cyber Security Standards to address a range of concerns in various areas of the Version 1 standards.

A Standard Drafting Team (SDT) was appointed by the NERC Standards Committee on August 7, 2008 to develop these modifications as part of Project 2008-06 – Cyber Security Order 706. The SDT has been charged to review each of the CIP reliability standards and address the modifications identified in the <u>FERC Order No. 706</u>. The SDT began meeting in October 2008.

Prior to this posting, the SDT developed CIP-002-2 through CIP-009-2 to comply with the near-term specific directives of FERC Order No. 706. This version of the Standards was approved by FERC in September of 2009 with additional directives to be addressed within 90-days of the order. In response, the SDT developed CIP-003-3 through CIP-009-3, which FERC approved in March 2010.

Throughout this period, the SDT has continued efforts to develop an approach to address the remaining FERC Order No. 706 directives. An original draft version of CIP-010 and CIP-011, which included the categorization of cyber systems in CIP-010 and associated cyber security requirements consolidated into a single CIP-011, were posted for informal comment in May of 2010. After reviewing and analyzing responses from the industry, the SDT determined it was infeasible to address all of the concerns and achieve industry consensus on CIP-010 and CIP-011 by the planned target date of December 2010. Consequently, the SDT developed a limited scope of requirements in Version 4 of the CIP Cyber Security Standards (CIP-002-4 through CIP-009-4) as an interim step to address the more immediate concerns raised in FERC Order No. 706, paragraph 236, especially those associated with CIP-002's identification of Critical Assets and the risk-based methodology used for the identification. CIP-002-4, which included a bright-line based approach for criteria used to identify Critical Assets in lieu of an entity defined risk-based methodology, and the conforming changes to CIP-003 through CIP-009, was approved by the Board of Trustees in January of 2011. On September 15, 2011, FERC issued a



Notice of Proposed Rulemaking (RM11-11) to approve Version 4 of the Cyber Security Standards with a 60 day comment period.

This draft Version 5 of the NERC CIP Cyber Security Standards is intended to address the remaining standards related issues of FERC Order No. 706.

One of the ERO's priorities is to develop a robust set of critical infrastructure reliability standards that enable the industry to adapt to continuously changing threats and vulnerabilities by emphasizing security risk management. NERC staff and industry are working together to accomplish this goal in 2012.

The SDT believes the NERC Version 5 CIP Cyber Security Standards provide a cyber security framework for the categorization and protection of BES Cyber Systems to support the reliable operation of the Bulk Electric System. These standards recognize the differing roles of each entity in the operation of the Bulk Electric System, the criticality and vulnerability of the cyber systems needed to support Bulk Electric System reliability, and the risks to which they are exposed.

#### **Standards Development Process**

The <u>Standard Processes Manual</u> contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

For more information or assistance, please contact Monica Benson, Standards Process Administrator, at monica.benson@nerc.net or at 404-446-2560.

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