

## 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:		Revisions to CIP <u>Reliability</u> sStandards to address Cyber Security <u>of</u> Communications between Control Centers	
Date Submitted:		March 4, 2020	
SAR Requester			
Name:		Soo Jin Kim, Manager of Standards Development	
Organization:		NERC	
Telephone:		404.831.4765	Email: Soo.jin.kim@nerc.net
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 checked="" 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
Industry Need (What Bulk Electric System (BES) reliability benefit does the proposed project provide?):			
<p><del>The project will address a directive issued by</del> <u>On January 23, 2020</u>, the Federal Energy Regulatory Commission (FERC) <del>in issued</del> <u>approved</u> Order No. 866 <u>approving CIP-012 and directing NERC</u> to develop modifications to <del>the CIP Reliability Standards</del> <u>CIP-012</u> to require protections regarding the availability of communications links and data communicated between the <del>b</del><u>B</u>ulk <del>e</del><u>E</u>lectric <del>s</del><u>S</u>ystem (<u>BES</u>) Control Centers.</p>			
Purpose or Goal (How does this proposed project provide the reliability-related benefit described above?):			
<p><del>This project will address the concerns of FERC outlined in Order No. 866.</del></p> <p><u>The purpose of this project is to address the Commission directive in Order No. 866 to develop modifications to the CIP Reliability Standards to require protections regarding the availability of communication links and data communicated between BES Control Centers. These revisions will</u></p>			

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<u>improve the security posture of responsible entities by clarifying expectations regarding communication between Control Centers, thereby ensuring the exchange of operational data and addressing the potential risk of loss of data.</u>
Project Scope (Define the parameters of the proposed project):
<u>This project will address the directive in Order No. 866. The proposed project will address the Commission directive regarding the availability of communication links and data communicated between BES Control Centers via development of modifications to CIP-012-1 as outlined in Order No. 866. The work will include development of Violation Risk Factors, Violation Severity Levels and an Implementation Plan for the modified Standard.</u>
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> which includes a discussion of the reliability-related benefits of developing a new or revised Reliability Standard or definition, and (2) a technical foundation document (e.g., research paper) to guide development of the Standard or definition):
<u>The SDT shall address the Order No. 866 directive by developing modifications to Reliability Standard CIP-012-1. The Commission directed the following:</u>
<u>Per paragraph 3, “[T]he Commission directs NERC to develop modifications to the CIP Reliability Standards to require protections regarding the <i>availability of communication links and data communicated between bulk electric system Control Centers.</i>”</u>
In Order No. 866, FERC stated that “maintaining the availability of communication networks and data should include provisions for incident recovery and continuity of operations in a responsible entity’s compliance plan.” FERC recognized that the redundancy of communication links cannot always be guaranteed, and acknowledged there should be plans for both recovery of compromised communication links and use of backup communication capability. See Order No. 866 at PP 35-36.
Cost Impact Assessment, if known (Provide a paragraph describing the potential cost impacts associated with the proposed project):
<u>Cost impact is unknown at this time.</u> <u>No additional project costs outside of the time and resources required to serve on the Standard Drafting Team are expected. Cost impact of implementation of the proposed Standard is dependent upon the method(s) by which a Responsible Entity chooses to meet any additional Requirements. However, a question will be asked during the comment period to ensure cost aspects are considered.</u>
Please describe any unique characteristics of the BES facilities that may be impacted by this proposed standard development project (e.g., Dispersed Generation Resources):
Submitter asserts there are no unique characteristics associated with BES facilities that will be impacted by this proposed standard development project.

<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.

Requested information	
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 most recent version of the NERC Functional Model for definitions):	
Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, <del>Distribution Provider</del> , Generator Owner, Generator Operator	
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.	
<del>None.</del>	
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 Modifications to CIP <del>Standards</del> , <u>and Project Standards, Project 2019-02 BES Cyber Systems Information Access Management, and 2020-03 Supply Chain Low Impact Revisions</u> are both active CIP projects.	
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.	
None at this time.	

Reliability Principles	
Does this proposed standard development project support at least one of the following Reliability Principles ( <a href="#">Reliability Interface Principles</a> )? 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 checked="" 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 checked="" 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.

<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.

<b>Market Interface Principles</b>	
Does the proposed standard development project comply with all of the following <a href="#">Market Interface Principles</a> ?	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

<b>Identified Existing or Potential Regional or Interconnection Variances</b>	
Region(s)/ Interconnection	Explanation
	None identified

### 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

#### 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

