



NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Revised Implementation Plan for Version 3 of Cyber Security Standards CIP-002-3 through CIP-009-3 January 20, 2010

Prerequisite Approvals

There are no other reliability standards or Standard Authorization Requests (SARs), in progress or approved, that must be implemented before this standard can be implemented.

Applicable Standards

The following standards are covered by this Implementation Plan:

- CIP-002-3 — Cyber Security — Critical Cyber Asset Identification
- CIP-003-3 — Cyber Security — Security Management Controls
- CIP-004-3 — Cyber Security — Personnel and Training
- CIP-005-3 — Cyber Security — Electronic Security Perimeter(s)
- CIP-006-3 — Cyber Security — Physical Security
- CIP-007-3 — Cyber Security — Systems Security Management
- CIP-008-3 — Cyber Security — Incident Reporting and Response Planning
- CIP-009-3 — Cyber Security — Recovery Plans for Critical Cyber Assets

These standards are posted for ballot by NERC together with this Implementation Plan. When these standards become effective, all prior versions of these standards are retired.

Compliance with Standards

Once these standards become effective, the Responsible Entities identified in the Applicability section of the standard must comply with the requirements. These Responsible Entities include:

- Reliability Coordinator
- Balancing Authority
- Interchange Authority
- Transmission Service Provider
- Transmission Owner
- Transmission Operator
- Generator Owner
- Generator Operator
- Load Serving Entity
- NERC
- Regional Entity

Proposed Effective Date

The Responsible Entities shall be compliant with all requirements on the Effective Date specified in each standard.

Implementation Plan for Newly Identified Critical Cyber Assets and Newly Registered Entities

Concurrently submitted with Version 3 of Cyber Security Standards CIP-002-3 through CIP-009-3 is a separate Implementation Plan document that would be used by the Responsible Entities to bring any newly identified Critical Cyber Assets into compliance with the Cyber Security Standards, as those assets are identified. This Implementation plan closes the compliance gap created in the Version 1 Implementation Plan whereby Responsible Entities were required to annually determine their list of Critical Cyber Assets, yet the implication from the Version 1 Implementation Plan was that any newly identified Critical Cyber Assets were to be immediately 'Auditably Compliant', thereby not allowing Responsible Entities the necessary time to achieve the Auditably Compliant state.

The Implementation Plan for newly identified Critical Cyber Assets provides a reasonable schedule for the Responsible Entity to achieve the 'Compliant' state for those newly identified Critical Cyber Assets.

The Implementation Plan for newly identified Critical Cyber Assets also addresses how to achieve the 'Compliant' state for: 1) Responsible Entities that merge with or are acquired by other Responsible Entities; and 2) Responsible Entities that register in the NERC Compliance Registry during or following the completion of the Implementation Plan for Version 3 of the NERC Cyber Security Standards CIP-002-3 to CIP-009-3.

Prior Version Implementation Plan Retirement

By December 31, 2009, CIP Version 1's Table 1, 2, and 3 Registered Entities that registered prior to December 31, 2007 will have reached the "Compliant" milestone for all CIP Version 1 Requirements. Timetables for reaching the "Auditably Compliant" milestone will still be in effect for these Entities going forward until said timetables expire. As such, when Table 3 Registered Entities reach the Auditably Compliant milestone on December 31, 2010, the Version 1 Implementation Plan is in practice retired. Table 4 of the CIP Version 1 Implementation Plan is applicable only for newly Registered Entities, and compliance milestones for newly Registered Entities is included in CIP Version 2's Implementation Plan for Newly Identified Critical Cyber Assets and Newly Registered Entities effective on April 1, 2010. CIP Version 3 milestones, are effective after FERC approval.

Implementation of CIP Version 2 and 3 Standards for U.S Nuclear Power Plant Owners and Operators

On September 15, 2009, NERC filed for FERC approval an implementation plan for the CIP Version 1 standards (CIP-002-1 through CIP-009-1) for owners and operators of US nuclear power plants in compliance with Order 706-B. In the plan, compliance with the Version 1 standards is predicated upon the latter of the effective date of the order approving the implementation plan plus

eighteen months; the determination of the scope of systems, structures, and components within the NERC and NRC jurisdictions plus ten months; or within six months following the completion of the first refueling outage beyond eighteen months from FERC approval of the implementation plan for those requirements requiring a refueling outage. Since that September 15, 2009 filing of the Version 1 implementation plan, FERC approved Version 2 of the NERC CIP standards on September 30, 2009 and NERC filed for FERC approval Version 3 CIP standards on December 29, 2009.

In its December 17, 2009 order on NERC's September 15, 2009 Version 1 implementation plan filing, FERC noted that the implementation timeline for the Version 2 CIP standards should be the same as the Implementation Plan for the Version 1 CIP standards. Consistent with this order and considering that only incremental modifications were made to Version 2 and Version 3 of the CIP standards relative to Version 1, compliance to Version 2 or Version 3 CIP-002 through CIP-009 standards (whichever is in effect at that time) for owners and operators of U.S. nuclear power plants will occur on the same schedule as the Version 1 CIP standards.

For example, if FERC approves the Version 1 implementation plan effective on May 1, 2010¹ and using the operative date for compliance to Version 1 standards as the FERC effective date of the order plus eighteen months, then compliance to the Version 1 standards would be required on November 1, 2011. However, since Version 1 will have been replaced by Version 2 and perhaps Version 3 by November, 2011, compliance to the Version 2 or Version 3 standards (whichever the current version is effective at that time) would therefore be required on November 1, 2011.

Using the hypothetical May 1, 2010 FERC effective date applied to a requirement linked to a refueling outage, compliance to the requirement would be required six months following the end of the first refueling outage that is beyond eighteen months from FERC approval of the implementation plan. In this case, the completion of the first refueling outage of the unit beyond November 1, 2011 would initiate the six month period. For purposes of this example, if the unit refueling outage occurred in the Spring, 2012 and ended on April 12, 2012, compliance with the requirement linked that outage would be required on October 12, 2012.

¹ These dates are provided as examples only and the FERC order effective date and compliance dates are hypothetical. Actual dates will be established based on FERC approval of the NERC Version 1 implementation schedule.