

September 30, 2013

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, D.C. 20426

Re: *Errata to Petition of the North American Electric Reliability Corporation for Approval of Critical Infrastructure Protection Reliability Standards Version 5, Docket No. RM13-5*

Dear Secretary Bose:

The North American Electric Reliability Corporation (“NERC”) hereby submits errata to the proposed defined terms and Violation Severity Levels (“VSLs”) associated with version 5 of the Critical Infrastructure Protection Reliability Standards (“CIP Version 5”) pending before the Commission in the above-captioned docket. NERC submitted its petition for approval of proposed CIP Version 5 on January 31, 2013 (“Petition”). On April 18, 2013, the Federal Energy Regulatory Commission (“Commission”) issued a Notice of Proposed Rulemaking (“NOPR”) proposing to approve CIP Version 5 and direct that NERC develop certain modifications to those Reliability Standards.<sup>1</sup> Among other things, the Commission noted in the NOPR that:

- NERC’s proposed definitions for Electronic Access Control or Monitoring Systems (“EACMS”) and Interactive Remote Access include the undefined term “intermediate devices” rather than the defined terms “Intermediate Systems;” and
- certain Violation Severity Levels (“VSLs”) contain typographical errors.

In its comments on the NOPR submitted on June 28, 2013, NERC stated it would make the necessary errata changes to: (1) replace the term “intermediate devices” with “Intermediate Systems” in the definitions for EACMS and Interactive Remote Access; and (2) correct any typographical errors in the VSLs. Attachment 1 hereto contains clean and redline versions of Exhibit A(2) of the Petition – Associated Modifications to the Glossary of Terms used in NERC Reliability Standards – to correct the definitions of EACMS and Interactive Remote Access; Attachment 2 contains clean and redline versions of proposed CIP-002-5.1 to correct the definition of EACMS provided in the background section of the

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<sup>1</sup> *Version 5 Critical Infrastructure Protection Reliability Standards*, Notice of Proposed Rulemaking, 143 FERC ¶ 61,055 (2013).

proposed standard; and Attachment 3 contains clean and redline versions of CIP-004-5.1 to correct a typographical error in the proposed VSLs assigned to CIP-004-5, Requirement R4, part 4.2.<sup>2</sup>

Should you have any questions, do not hesitate to contact the undersigned.

Respectfully submitted,

/S. Shamai Elstein

S. Shamai Elstein

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<sup>2</sup> In the NOPR, the Commission stated that it also had concerns with certain other proposed VSL assignments but did not specify those concerns. NOPR at P 102, n. 82. As a result, NERC includes only errata it has identified through its own review.

## **ATTACHMENT 1**

## **Definitions of Terms Used in Version 5 CIP Cyber Security Standards**

*This section includes all newly defined or revised terms used in the proposed Version 5 CIP Cyber Security Standards and proposes terms for retirement. Terms already defined in the Glossary of Terms used in NERC Reliability Standards are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary. New defined terms are underscored. For existing glossary terms, new language is shown as underscored, while deleted language is shown as stricken. The list of terms proposed for retirement is at the end of the document.*

### **BES Cyber Asset**

A Cyber Asset that if rendered unavailable, degraded, or misused would, within 15 minutes of its required operation, misoperation, or non-operation, adversely impact one or more Facilities, systems, or equipment, which, if destroyed, degraded, or otherwise rendered unavailable when needed, would affect the reliable operation of the Bulk Electric System. Redundancy of affected Facilities, systems, and equipment shall not be considered when determining adverse impact. Each BES Cyber Asset is included in one or more BES Cyber Systems. (A Cyber Asset is not a BES Cyber Asset if, for 30 consecutive calendar days or less, it is directly connected to a network within an ESP, a Cyber Asset within an ESP, or to a BES Cyber Asset, and it is used for data transfer, vulnerability assessment, maintenance, or troubleshooting purposes.)

### **BES Cyber System**

One or more BES Cyber Assets logically grouped by a responsible entity to perform one or more reliability tasks for a functional entity.

### **BES Cyber System Information**

Information about the BES Cyber System that could be used to gain unauthorized access or pose a security threat to the BES Cyber System. BES Cyber System Information does not include individual pieces of information that by themselves do not pose a threat or could not be used to allow unauthorized access to BES Cyber Systems, such as, but not limited to, device names, individual IP addresses without context, ESP names, or policy statements. Examples of BES Cyber System Information may include, but are not limited to, security procedures or security information about BES Cyber Systems, Physical Access Control Systems, and Electronic Access Control or Monitoring Systems that is not publicly available and could be used to allow unauthorized access or unauthorized distribution; collections of network addresses; and network topology of the BES Cyber System.

### **CIP Exceptional Circumstance**

A situation that involves or threatens to involve one or more of the following, or similar, conditions that impact safety or BES reliability: a risk of injury or death; a natural disaster; civil unrest; an imminent or existing hardware, software, or equipment failure; a Cyber Security Incident requiring emergency assistance; a response by emergency services; the enactment of a mutual assistance agreement; or an impediment of large scale workforce availability.

### **CIP Senior Manager**

A single senior management official with overall authority and responsibility for leading and managing implementation of and continuing adherence to the requirements within the NERC CIP Standards, CIP-002 through CIP-011.

### **Control Center**

One or more facilities hosting operating personnel that monitor and control the Bulk Electric System (BES) in real-time to perform the reliability tasks, including their associated data centers, of: 1) a Reliability Coordinator, 2) a Balancing Authority, 3) a Transmission Operator for transmission Facilities at two or more locations, or 4) a Generator Operator for generation Facilities at two or more locations.

### **Cyber Assets**

Programmable electronic devices, ~~and communication networks~~ including the hardware, software, and data in those devices.

### **Cyber Security Incident**

~~Any~~ A malicious act or suspicious event that:

- Compromises, or was an attempt to compromise, the Electronic Security Perimeter or Physical Security Perimeter ~~of a Critical Cyber Asset~~, or;
- Disrupts, or was an attempt to disrupt, the operation of a ~~Critical Cyber Asset~~ BES Cyber System.

### **Dial-up Connectivity**

A data communication link that is established when the communication equipment dials a phone number and negotiates a connection with the equipment on the other end of the link.

### **Electronic Access Control or Monitoring Systems (“EACMS”)**

Cyber Assets that perform electronic access control or electronic access monitoring of the Electronic Security Perimeter(s) or BES Cyber Systems. This includes Intermediate Systems.

### **Electronic Access Point (“EAP”)**

A Cyber Asset interface on an Electronic Security Perimeter that allows routable communication between Cyber Assets outside an Electronic Security Perimeter and Cyber Assets inside an Electronic Security Perimeter.

### **Electronic Security Perimeter (“ESP”)**

The logical border surrounding a network to which ~~Critical Cyber Assets~~ BES Cyber Systems are connected using a routable protocol ~~and for which access is controlled.~~

### **External Routable Connectivity**

The ability to access a BES Cyber System from a Cyber Asset that is outside of its associated Electronic Security Perimeter via a bi-directional routable protocol connection.

### **Interactive Remote Access**

User-initiated access by a person employing a remote access client or other remote access technology using a routable protocol. Remote access originates from a Cyber Asset that is not an Intermediate System and not located within any of the Responsible Entity’s Electronic Security Perimeter(s) or at a defined Electronic Access Point (EAP). Remote access may be initiated from: 1) Cyber Assets used or owned by the Responsible Entity, 2) Cyber Assets used or owned by employees, and 3) Cyber Assets used or owned by vendors, contractors, or consultants. Interactive remote access does not include system-to-system process communications.

### **Intermediate System**

A Cyber Asset or collection of Cyber Assets performing access control to restrict Interactive Remote Access to only authorized users. The Intermediate System must not be located inside the Electronic Security Perimeter.

### **Physical Access Control Systems (“PACS”)**

Cyber Assets that control, alert, or log access to the Physical Security Perimeter(s), exclusive of locally mounted hardware or devices at the Physical Security Perimeter such as motion sensors, electronic lock control mechanisms, and badge readers.

### **Physical Security Perimeter (“PSP”)**

~~The physical, completely enclosed (“six wall”) border surrounding computer rooms, telecommunications rooms, operations centers, and other locations in which Critical Cyber Assets are housed and for which access is controlled.~~

The physical border surrounding locations in which BES Cyber Assets, BES Cyber Systems, or Electronic Access Control or Monitoring Systems reside, and for which access is controlled.

### **Protected Cyber Assets (“PCA”)**

One or more Cyber Assets connected using a routable protocol within or on an Electronic Security Perimeter that is not part of the highest impact BES Cyber System within the same Electronic Security Perimeter. The impact rating of Protected Cyber Assets is equal to the highest rated BES Cyber System in the same ESP. A Cyber Asset is not a Protected Cyber Asset if, for 30 consecutive calendar days or less, it is connected either to a Cyber Asset within the ESP or to the network within the ESP, and it is used for data transfer, vulnerability assessment, maintenance, or troubleshooting purposes.

### **Reportable Cyber Security Incident**

A Cyber Security Incident that has compromised or disrupted one or more reliability tasks of a functional entity.

**Terms to be retired from the *Glossary of Terms used in NERC Reliability Standards* once the standards that use those terms are replaced:**

**Critical Assets**

**Critical Cyber Assets**

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A Cyber Asset that if rendered unavailable, degraded, or misused would, within 15 minutes of its required operation, misoperation, or non-operation, adversely impact one or more Facilities, systems, or equipment, which, if destroyed, degraded, or otherwise rendered unavailable when needed, would affect the reliable operation of the Bulk Electric System. Redundancy of affected Facilities, systems, and equipment shall not be considered when determining adverse impact. Each BES Cyber Asset is included in one or more BES Cyber Systems. (A Cyber Asset is not a BES Cyber Asset if, for 30 consecutive calendar days or less, it is directly connected to a network within an ESP, a Cyber Asset within an ESP, or to a BES Cyber Asset, and it is used for data transfer, vulnerability assessment, maintenance, or troubleshooting purposes.)

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**Critical Assets**

**Critical Cyber Assets**

## **ATTACHMENT 2**

## Standard Development Timeline

*This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.*

### Development Steps Completed

1. SAR posted for comment (March 20, 2008).
2. SC authorized moving the SAR forward to standard development (July 10, 2008).
3. First posting for 60-day formal comment period and concurrent ballot (November 2011).
4. Second posting for 40-day formal comment period and concurrent ballot (April 2012).
5. Third posting for 30-day formal comment period and concurrent ballot (September 2012).

### Description of Current Draft

This is the fourth posting of Version 5 of the CIP Cyber Security Standards for a 10-day recirculation ballot. An initial concept paper, *Categorizing Cyber Systems — An Approach Based on BES Reliability Functions*, was posted for public comment in July 2009. An early draft consolidating CIP-002 – CIP-009, numbered CIP-010-1 and CIP-011-1, was posted for public informal comment in May 2010. A first posting of Version 5, which reverted to the original organization of the standards with some changes, was posted in November 2011 for a 60-day comment period and ballot. A second posting of Version 5 was posted in April 2012 for a 40-day comment period and ballot. A third posting of Version 5 was posted in September 2012 for a 30-day comment period and ballot. Version 5 addresses the balance of the FERC directives in its Order No. 706 approving Version 1 of the standards. This posting for recirculation ballot addresses the comments received from the third posting and ballot.

Anticipated Actions	Anticipated Date
Recirculation ballot	November 2012
BOT adoption	December 2012

## Effective Dates

1. **24 Months Minimum** – CIP-002-5.1 shall become effective on the later of July 1, 2015, or the first calendar day of the ninth calendar quarter after the effective date of the order providing applicable regulatory approval.
2. In those jurisdictions where no regulatory approval is required CIP-002-5.1 shall become effective on the first day of the ninth calendar quarter following Board of Trustees' approval, or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities.

## Version History

Version	Date	Action	Change Tracking
1	1/16/06	R3.2 — Change “Control Center” to “control center.”	3/24/06
2	9/30/09	Modifications to clarify the requirements and to bring the compliance elements into conformance with the latest guidelines for developing compliance elements of standards. Removal of reasonable business judgment. Replaced the RRO with the RE as a Responsible Entity. Rewording of Effective Date. Changed compliance monitor to Compliance Enforcement Authority.	
3	12/16/09	Updated version number from -2 to -3. Approved by the NERC Board of Trustees.	Update
3	3/31/10	Approved by FERC.	
4	12/30/10	Modified to add specific criteria for Critical Asset identification.	Update
4	1/24/11	Approved by the NERC Board of Trustees.	Update
5	TBD	Modified to coordinate with other CIP standards and to revise format to use RBS Template.	
5.1	TBD	Replaced “Devices” with “Systems” in the of definition Electronic Access	Errata

		Control or Monitoring Systems in background section	
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## **Definitions of Terms Used in Standard**

*See the associated “Definitions of Terms Used in Version 5 CIP Cyber Security Standards,” which consolidates and includes all newly defined or revised terms used in the proposed Version 5 CIP Cyber Security Standards.*



*When this standard has received ballot approval, the text boxes will be moved to the “Guidelines and Technical Basis” section of the Standard.*

## A. Introduction

1. **Title:** Cyber Security — BES Cyber System Categorization
2. **Number:** CIP-002-5.1
3. **Purpose:** To identify and categorize BES Cyber Systems and their associated BES Cyber Assets 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. Identification and categorization of BES Cyber Systems support appropriate protection against compromises that could lead to misoperation or instability in the BES.
4. **Applicability:**
  - 4.1. **Functional Entities:** For the purpose of the requirements contained herein, the following list of functional entities will be collectively referred to as “Responsible Entities.” For requirements in this standard where a specific functional entity or subset of functional entities are the applicable entity or entities, the functional entity or entities are specified explicitly.
    - 4.1.1. **Balancing Authority**
    - 4.1.2. **Distribution Provider that owns** one or more of the following Facilities, systems, and equipment for the protection or restoration of the BES:
      - 4.1.2.1. Each underfrequency load shedding (UFLS) or undervoltage load shedding (UVLS) system that:
        - 4.1.2.1.1. is part of a Load shedding program that is subject to one or more requirements in a NERC or Regional Reliability Standard; and
        - 4.1.2.1.2. performs automatic Load shedding under a common control system owned by the Responsible Entity, without human operator initiation, of 300 MW or more.
      - 4.1.2.2. Each Special Protection System or Remedial Action Scheme where the Special Protection System or Remedial Action Scheme is subject to one or more requirements in a NERC or Regional Reliability Standard.
      - 4.1.2.3. Each Protection System (excluding UFLS and UVLS) that applies to Transmission where the Protection System is subject to one or more requirements in a NERC or Regional Reliability Standard.
      - 4.1.2.4. Each Cranking Path and group of Elements meeting the initial switching requirements from a Blackstart Resource up to and including the first interconnection point of the starting station service of the next generation unit(s) to be started.

- 4.1.3. Generator Operator**
- 4.1.4. Generator Owner**
- 4.1.5. Interchange Coordinator or Interchange Authority**
- 4.1.6. Reliability Coordinator**
- 4.1.7. Transmission Operator**
- 4.1.8. Transmission Owner**

**4.2. Facilities:** For the purpose of the requirements contained herein, the following Facilities, systems, and equipment owned by each Responsible Entity in 4.1 above are those to which these requirements are applicable. For requirements in this standard where a specific type of Facilities, system, or equipment or subset of Facilities, systems, and equipment are applicable, these are specified explicitly.

**4.2.1. Distribution Provider:** One or more of the following Facilities, systems and equipment owned by the Distribution Provider for the protection or restoration of the BES:

**4.2.1.1.** Each UFLS or UVLS System that:

**4.2.1.1.1.** is part of a Load shedding program that is subject to one or more requirements in a NERC or Regional Reliability Standard; and

**4.2.1.1.2.** performs automatic Load shedding under a common control system owned by the Responsible Entity, without human operator initiation, of 300 MW or more.

**4.2.1.2.** Each Special Protection System or Remedial Action Scheme where the Special Protection System or Remedial Action Scheme is subject to one or more requirements in a NERC or Regional Reliability Standard.

**4.2.1.3.** Each Protection System (excluding UFLS and UVLS) that applies to Transmission where the Protection System is subject to one or more requirements in a NERC or Regional Reliability Standard.

**4.2.1.4.** Each Cranking Path and group of Elements meeting the initial switching requirements from a Blackstart Resource up to and including the first interconnection point of the starting station service of the next generation unit(s) to be started.

**4.2.2. Responsible Entities listed in 4.1 other than Distribution Providers:**

All BES Facilities.

**4.2.3. Exemptions:** The following are exempt from Standard CIP-002-5.1:

**4.2.3.1.** Cyber Assets at Facilities regulated by the Canadian Nuclear Safety Commission.

**4.2.3.2.** Cyber Assets associated with communication networks and data communication links between discrete Electronic Security Perimeters.

**4.2.3.3.** The systems, structures, and components that are regulated by the Nuclear Regulatory Commission under a cyber security plan pursuant to 10 C.F.R. Section 73.54.

**4.2.3.4.** For Distribution Providers, the systems and equipment that are not included in section 4.2.1 above.

**5. Background:**

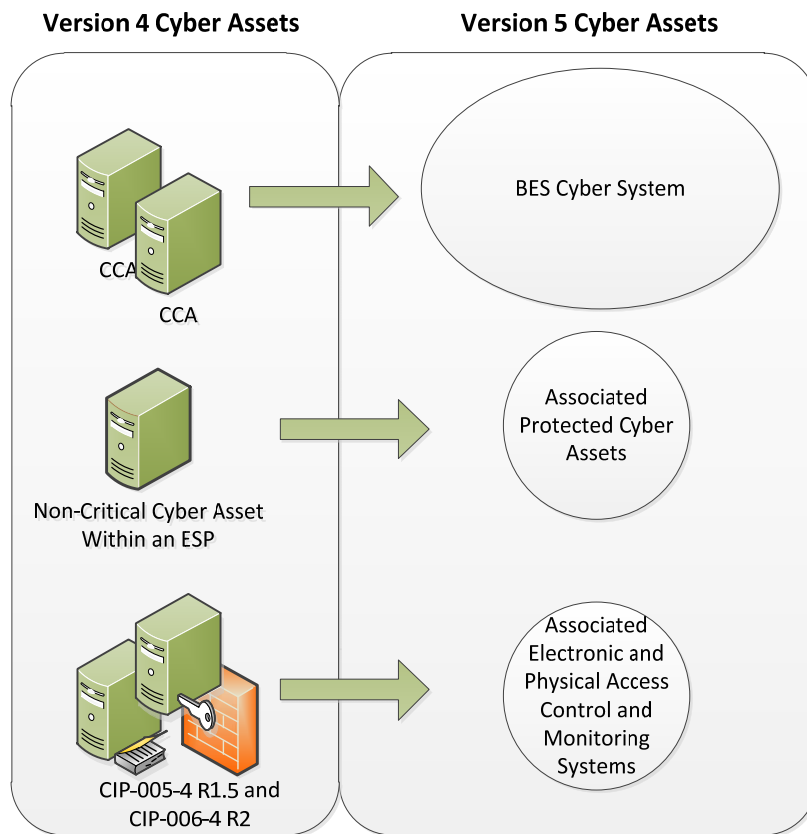
This standard provides “bright-line” criteria for applicable Responsible Entities to categorize their BES Cyber Systems based on the impact of their associated Facilities, systems, and equipment, which, if destroyed, degraded, misused, or otherwise rendered unavailable, would affect the reliable operation of the Bulk Electric System. Several concepts provide the basis for the approach to the standard.

Throughout the standards, unless otherwise stated, bulleted items in the requirements are items that are linked with an “or,” and numbered items are items that are linked with an “and.”

Many references in the Applicability section and the criteria in Attachment 1 of CIP-002 use a threshold of 300 MW for UFLS and UVLS. This particular threshold of 300 MW for UVLS and UFLS was provided in Version 1 of the CIP Cyber Security Standards. The threshold remains at 300 MW since it is specifically addressing UVLS and UFLS, which are last ditch efforts to save the Bulk Electric System. A review of UFLS tolerances defined within regional reliability standards for UFLS program requirements to date indicates that the historical value of 300 MW represents an adequate and reasonable threshold value for allowable UFLS operational tolerances.

**BES Cyber Systems**

One of the fundamental differences between Versions 4 and 5 of the CIP Cyber Security Standards is the shift from identifying Critical Cyber Assets to identifying BES Cyber Systems. This change results from the drafting team’s review of the NIST Risk Management Framework and the use of an analogous term “information system” as the target for categorizing and applying security controls.



In transitioning from Version 4 to Version 5, a BES Cyber System can be viewed simply as a grouping of Critical Cyber Assets (as that term is used in Version 4). The CIP Cyber Security Standards use the “BES Cyber System” term primarily to provide a higher level for referencing the object of a requirement. For example, it becomes possible to apply requirements dealing with recovery and malware protection to a grouping rather than individual Cyber Assets, and it becomes clearer in the requirement that malware protection applies to the system as a whole and may not be necessary for every individual device to comply.

Another reason for using the term “BES Cyber System” is to provide a convenient level at which a Responsible Entity can organize their documented implementation of the requirements and compliance evidence. Responsible Entities can use the well-developed concept of a *security plan* for each BES Cyber System to document the programs, processes, and plans in place to comply with security requirements.

It 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. For example, the Responsible Entity might choose to view an entire plant control system as a single BES Cyber System, or it might choose to view certain components of the plant control system as distinct BES Cyber Systems. 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.

### **Reliable Operation of the BES**

The scope of the CIP Cyber Security Standards is restricted to BES Cyber Systems that would impact the reliable operation of the BES. In order to identify BES Cyber Systems, Responsible Entities determine whether the BES Cyber Systems perform or support any BES reliability function according to those reliability tasks identified for their reliability function and the corresponding functional entity's responsibilities as defined in its relationships with other functional entities in the NERC Functional Model. This ensures that the *initial* scope for consideration includes only those BES Cyber Systems and their associated BES Cyber Assets that perform or support the reliable operation of the BES. The definition of BES Cyber Asset provides the basis for this scoping.

### **Real-time Operations**

One characteristic of the BES Cyber Asset is a real-time scoping characteristic. The time horizon that is significant for BES Cyber Systems and BES Cyber Assets subject to the application of these Version 5 CIP Cyber Security Standards is defined as that which is material to real-time operations for the reliable operation of the BES. To provide a better defined time horizon than "Real-time," BES Cyber Assets are those Cyber Assets that, if rendered unavailable, degraded, or misused, would adversely impact the reliable operation of the BES within 15 minutes of the activation or exercise of the compromise. This time window must not include in its consideration the activation of redundant BES Cyber Assets or BES Cyber Systems: from the cyber security standpoint, redundancy does not mitigate cyber security vulnerabilities.

### **Categorization Criteria**

The criteria defined in Attachment 1 are used to categorize BES Cyber Systems into impact categories. Requirement 1 only requires the discrete identification of BES Cyber Systems for those in the high impact and medium impact categories. All BES Cyber Systems for Facilities not included in Attachment 1 – Impact Rating Criteria, Criteria 1.1 to 1.4 and Criteria 2.1 to 2.11 default to be low impact.

This general process of categorization of BES Cyber Systems based on impact on the reliable operation of the BES is consistent with risk management approaches for the purpose of application of cyber security requirements in the remainder of the Version 5 CIP Cyber Security Standards.

### **Electronic Access Control or Monitoring Systems, Physical Access Control Systems, and Protected Cyber Assets that are associated with BES Cyber Systems**

BES Cyber Systems have associated Cyber Assets, which, if compromised, pose a threat to the BES Cyber System by virtue of: (a) their location within the Electronic Security Perimeter (Protected Cyber Assets), or (b) the security control function they perform (Electronic Access Control or Monitoring Systems and Physical Access Control Systems). These Cyber Assets include:

**Electronic Access Control or Monitoring Systems (“EACMS”)** – Examples include: Electronic Access Points, Intermediate Systems, authentication servers (e.g., RADIUS servers, Active Directory servers, Certificate Authorities), security event monitoring systems, and intrusion detection systems.

**Physical Access Control Systems (“PACS”)**– Examples include: authentication servers, card systems, and badge control systems.

**Protected Cyber Assets (“PCA”)** – Examples may include, to the extent they are within the ESP: file servers, ftp servers, time servers, LAN switches, networked printers, digital fault recorders, and emission monitoring systems.

## B. Requirements and Measures

### **Rationale – R1:**

BES Cyber Systems at each site location have varying impact on the reliable operation of the Bulk Electric System. Attachment 1 provides a set of “bright-line” criteria that the Responsible Entity must use to identify these BES Cyber Systems in accordance with the impact on the BES. BES Cyber Systems must be identified and categorized according to their impact so that the appropriate measures can be applied, commensurate with their impact. These impact categories will be the basis for the application of appropriate requirements in CIP-003-CIP-011.

- R1.** Each Responsible Entity shall implement a process that considers each of the following assets for purposes of parts 1.1 through 1.3: [*Violation Risk Factor: High*][*Time Horizon: Operations Planning*]
- 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).
- M1.** Acceptable evidence includes, but is not limited to, dated electronic or physical lists required by Requirement R1, and Parts 1.1 and 1.2.

### **Rationale – R2**

The lists required by Requirement R1 are reviewed on a periodic basis to ensure that all BES Cyber Systems required to be categorized have been properly identified and categorized. The miscategorization or non-categorization of a BES Cyber System can lead to the application of inadequate or non-existent cyber security controls that can lead to compromise or misuse that can affect the real-time operation of the BES. The CIP Senior Manager's approval ensures proper oversight of the process by the appropriate Responsible Entity personnel.

- R2.** The Responsible Entity shall: [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning*]
- 2.1** Review the identifications in Requirement R1 and its parts (and update them if there are changes identified) at least once every 15 calendar months, even if it has no identified items in Requirement R1, and
  - 2.2** Have its CIP Senior Manager or delegate approve the identifications required by Requirement R1 at least once every 15 calendar months, even if it has no identified items in Requirement R1.
- M2.** Acceptable evidence includes, but is not limited to, electronic or physical dated records to demonstrate that the Responsible Entity has reviewed and updated, where necessary, the identifications required in Requirement R1 and its parts, and has had its CIP Senior Manager or delegate approve the identifications required in Requirement R1 and its parts at least once every 15 calendar months, even if it has none identified in Requirement R1 and its parts, as required by Requirement R2.



## C. Compliance

### 1. Compliance Monitoring Process:

#### 1.1. Compliance Enforcement Authority:

The Regional Entity shall serve as the Compliance Enforcement Authority (“CEA”) unless the applicable entity is owned, operated, or controlled by the Regional Entity. In such cases the ERO or a Regional Entity approved by FERC or other applicable governmental authority shall serve as the CEA.

#### 1.2. Evidence Retention:

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the CEA may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Responsible Entity shall keep data or evidence to show compliance as identified below unless directed by its CEA to retain specific evidence for a longer period of time as part of an investigation:

- Each Responsible Entity shall retain evidence of each requirement in this standard for three calendar years.
- If a Responsible Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time specified above, whichever is longer.
- The CEA shall keep the last audit records and all requested and submitted subsequent audit records.

#### 1.3. Compliance Monitoring and Assessment Processes:

- Compliance Audit
- Self-Certification
- Spot Checking
- Compliance Investigation
- Self-Reporting
- Complaint

#### 1.4. Additional Compliance Information

- None

**D. Regional Variances**

None.

**E. Interpretations**

None.

**F. Associated Documents**

None.

## **CIP-002-5.1 - Attachment 1**

### **Impact Rating Criteria**

*The criteria defined in Attachment 1 do not constitute stand-alone compliance requirements, but are criteria characterizing the level of impact and are referenced by requirements.*

#### **1. High Impact Rating (H)**

Each BES Cyber System used by and located at any of the following:

- 1.1.** Each Control Center or backup Control Center used to perform the functional obligations of the Reliability Coordinator.
- 1.2.** Each Control Center or backup Control Center used to perform the functional obligations of the Balancing Authority: 1) for generation equal to or greater than an aggregate of 3000 MW in a single Interconnection, or 2) for one or more of the assets that meet criterion 2.3, 2.6, or 2.9.
- 1.3.** Each Control Center or backup Control Center used to perform the functional obligations of the Transmission Operator for one or more of the assets that meet criterion 2.2, 2.4, 2.5, 2.7, 2.8, 2.9, or 2.10.
- 1.4.** Each Control Center or backup Control Center used to perform the functional obligations of the Generator Operator for one or more of the assets that meet criterion 2.1, 2.3, 2.6, or 2.9.

#### **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.
- 2.2.** Each BES reactive resource or group of resources at a single location (excluding generation Facilities) with an aggregate maximum Reactive Power nameplate rating of 1000 MVAR or greater (excluding those at generation Facilities). 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 resources that in aggregate equal or exceed 1000 MVAR.

- 2.3. Each generation Facility that its Planning Coordinator or Transmission Planner designates, and informs the Generator Owner or Generator Operator, as necessary to avoid an Adverse Reliability Impact in the planning horizon of more than one year.
- 2.4. Transmission Facilities operated at 500 kV or higher. For the purpose of this criterion, the collector bus for a generation plant is not considered a Transmission Facility, but is part of the generation interconnection Facility.
- 2.5. Transmission Facilities that are operating between 200 kV and 499 kV at a single station or substation, where the station or substation is connected at 200 kV or higher voltages to three or more other Transmission stations or substations and has an "aggregate weighted value" exceeding 3000 according to the table below. The "aggregate weighted value" for a single station or substation is determined by summing the "weight value per line" shown in the table below for each incoming and each outgoing BES Transmission Line that is connected to another Transmission station or substation. For the purpose of this criterion, the collector bus for a generation plant is not considered a Transmission Facility, but is part of the generation interconnection Facility.

Voltage Value of a Line	Weight Value per Line
less than 200 kV (not applicable)	(not applicable)
200 kV to 299 kV	700
300 kV to 499 kV	1300
500 kV and above	0

- 2.6. Generation at a single plant location or Transmission Facilities at a single station or substation location that are identified by its Reliability Coordinator, Planning Coordinator, or Transmission Planner as critical to the derivation of Interconnection Reliability Operating Limits (IROLs) and their associated contingencies.
- 2.7. Transmission Facilities identified as essential to meeting Nuclear Plant Interface Requirements.
- 2.8. Transmission Facilities, including generation interconnection Facilities, providing the generation interconnection required to connect generator output to the Transmission Systems that, if destroyed, degraded, misused, or otherwise rendered unavailable, would result in the loss of the generation Facilities identified by any Generator Owner as a result of its application of Attachment 1, criterion 2.1 or 2.3.
- 2.9. Each Special Protection System (SPS), Remedial Action Scheme (RAS), or automated switching System that operates BES Elements, that, if destroyed, degraded, misused or otherwise rendered unavailable, would cause one or more Interconnection Reliability Operating Limits (IROLs) violations for failure to operate as designed or cause a reduction in one or more IROLs if destroyed, degraded, misused, or otherwise rendered unavailable.

- 2.10.** Each system or group of Elements that performs automatic Load shedding under a common control system, without human operator initiation, of 300 MW or more implementing undervoltage load shedding (UVLS) or underfrequency load shedding (UFLS) under a load shedding program that is subject to one or more requirements in a NERC or regional reliability standard.
- 2.11.** Each Control Center or backup Control Center, not already included in High Impact Rating (H) above, used to perform the functional obligations of the Generator Operator for an aggregate highest rated net Real Power capability of the preceding 12 calendar months equal to or exceeding 1500 MW in a single Interconnection.
- 2.12.** Each Control Center or backup Control Center used to perform the functional obligations of the Transmission Operator not included in High Impact Rating (H), above.
- 2.13.** Each Control Center or backup Control Center, not already included in High Impact Rating (H) above, used to perform the functional obligations of the Balancing Authority for generation equal to or greater than an aggregate of 1500 MW in a single Interconnection.

### **3. Low Impact Rating (L)**

BES Cyber Systems not included in Sections 1 or 2 above that are associated with any of the following assets and that meet the applicability qualifications in Section 4 - Applicability, part 4.2 – Facilities, of this standard:

- 3.1.** Control Centers and backup Control Centers.
- 3.2.** Transmission stations and substations.
- 3.3.** Generation resources.
- 3.4.** Systems and facilities critical to system restoration, including Blackstart Resources and Cranking Paths and initial switching requirements.
- 3.5.** Special Protection Systems that support the reliable operation of the Bulk Electric System.
- 3.6.** For Distribution Providers, Protection Systems specified in Applicability section 4.2.1 above.

## Guidelines and Technical Basis

### Section 4 – Scope of Applicability of the CIP Cyber Security Standards

Section “4. Applicability” of the standards provides important information for Responsible Entities to determine the scope of the applicability of the CIP Cyber Security Requirements.

Section “4.1. Functional Entities” is a list of NERC functional entities to which the standard applies. If the entity is registered as one or more of the functional entities listed in section 4.1, then the NERC CIP Cyber Security Standards apply. Note that there is a qualification in section 4.1 that restricts the applicability in the case of Distribution Providers to only those that own certain types of systems and equipment listed in 4.2.

Section “4.2. Facilities” defines the scope of the Facilities, systems, and equipment owned by the Responsible Entity, as qualified in section 4.1, that is subject to the requirements of the standard. In addition to the set of BES Facilities, Control Centers, and other systems and equipment, the list includes the qualified set of systems and equipment owned by Distribution Providers. While the NERC Glossary term “Facilities” already includes the BES characteristic, the additional use of the term BES here is meant to reinforce the scope of applicability of these Facilities where it is used, especially in this applicability scoping section. This in effect sets the scope of Facilities, systems, and equipment that is subject to the standards. This section is especially significant in CIP-002-5.1 and represents the total scope of Facilities, systems, and equipment to which the criteria in Attachment 1 apply. This is important because it determines the balance of these Facilities, systems, and equipment that are Low Impact once those that qualify under the High and Medium Impact categories are filtered out.

For the purpose of identifying groups of Facilities, systems, and equipment, whether by location or otherwise, the Responsible Entity identifies assets as described in Requirement R1 of CIP-002-5.1. This is a process familiar to Responsible Entities that have to comply with versions 1, 2, 3, and 4 of the CIP standards for Critical Assets. As in versions 1, 2, 3, and 4, Responsible Entities may use substations, generation plants, and Control Centers at single site locations as identifiers of these groups of Facilities, systems, and equipment.

#### **CIP-002-5.1**

CIP-002-5.1 requires that applicable Responsible Entities categorize their BES Cyber Systems and associated BES Cyber Assets according to the criteria in Attachment 1. A BES Cyber Asset includes in its definition, “...that if rendered unavailable, degraded, or misused would, within 15 minutes adversely impact the reliable operation of the BES.”

The following provides guidance that a Responsible Entity may use to identify the BES Cyber Systems that would be in scope. The concept of BES reliability operating service is useful in providing Responsible Entities with the option of a defined process for scoping those BES Cyber

Systems that would be subject to CIP-002-5.1. The concept includes a number of named BES reliability operating services. These named services include:

- Dynamic Response to BES conditions
- Balancing Load and Generation
- Controlling Frequency (Real Power)
- Controlling Voltage (Reactive Power)
- Managing Constraints
- Monitoring & Control
- Restoration of BES
- Situational Awareness
- Inter-Entity Real-Time Coordination and Communication

Responsibility for the reliable operation of the BES is spread across all Entity Registrations. Each entity registration has its own special contribution to reliable operations and the following discussion helps identify which entity registration, in the context of those functional entities to which these CIP standards apply, performs which reliability operating service, as a process to identify BES Cyber Systems that would be in scope. The following provides guidance for Responsible Entities to determine applicable reliability operations services according to their Function Registration type.

Entity Registration	RC	BA	TOP	TO	DP	GOP	GO
Dynamic Response		X	X	X	X	X	X
Balancing Load & Generation	X	X	X	X	X	X	X
Controlling Frequency		X				X	X
Controlling Voltage			X	X	X		X
Managing Constraints	X		X			X	
Monitoring and Control			X			X	
Restoration			X			X	
Situation Awareness	X	X	X			X	
Inter-Entity coordination	X	X	X	X		X	X

**Dynamic Response**

The Dynamic Response Operating Service includes those actions performed by BES Elements or subsystems which are automatically triggered to initiate a response to a BES condition. These actions are triggered by a single element or control device or a combination of these elements or devices in concert to perform an action or cause a condition in reaction to the triggering action or condition. The types of dynamic responses that may be considered as potentially having an impact on the BES are:

- Spinning reserves (contingency reserves)
  - Providing actual reserve generation when called upon (GO,GOP)
  - Monitoring that reserves are sufficient (BA)
- Governor Response
  - Control system used to actuate governor response (GO)
- Protection Systems (transmission & generation)
  - Lines, buses, transformers, generators (DP, TO, TOP, GO, GOP)
  - Zone protection for breaker failure (DP, TO, TOP)
  - Breaker protection (DP, TO, TOP)
  - Current, frequency, speed, phase (TO, TOP, GO, GOP)
- Special Protection Systems or Remedial Action Schemes
  - Sensors, relays, and breakers, possibly software (DP, TO, TOP)
- Under and Over Frequency relay protection (includes automatic load shedding)
  - Sensors, relays & breakers (DP)
- Under and Over Voltage relay protection (includes automatic load shedding)
  - Sensors, relays & breakers (DP)
- Power System Stabilizers (GO)

### **Balancing Load and Generation**

The Balancing Load and Generation Operations Service includes activities, actions and conditions necessary for monitoring and controlling generation and load in the operations planning horizon and in real-time. Aspects of the Balancing Load and Generation function include, but are not limited to:

- Calculation of Area Control Error (ACE)
  - Field data sources (real time tie flows, frequency sources, time error, etc) (TO, TOP)
  - Software used to perform calculation (BA)
- Demand Response
  - Ability to identify load change need (BA)
  - Ability to implement load changes (TOP, DP)
- Manually Initiated Load shedding
  - Ability to identify load change need (BA)
  - Ability to implement load changes (TOP, DP)



- Non-spinning reserve (contingency reserve)
  - Know generation status, capability, ramp rate, start time (GO, BA)
  - Start units and provide energy (GOP)

### **Controlling Frequency (Real Power)**

The Controlling Frequency Operations Service includes activities, actions and conditions which ensure, in real time, that frequency remains within bounds acceptable for the reliability or operability of the BES. Aspects of the Controlling Frequency function include, but are limited to:

- Generation Control (such as AGC)
  - ACE, current generator output, ramp rate, unit characteristics (BA, GOP, GO)
  - Software to calculate unit adjustments (BA)
  - Transmit adjustments to individual units (GOP)
  - Unit controls implementing adjustments (GOP)
- Regulation (regulating reserves)
  - Frequency source, schedule (BA)
  - Governor control system (GO)

### **Controlling Voltage (Reactive Power)**

The Controlling Voltage Operations Service includes activities, actions and conditions which ensure, in real time, that voltage remains within bounds acceptable for the reliability or operability of the BES. Aspects of the Controlling Voltage function include, but are not limited to:

- Automatic Voltage Regulation (AVR)
  - Sensors, stator control system, feedback (GO)
- Capacitive resources
  - Status, control (manual or auto), feedback (TOP, TO,DP)
- Inductive resources (transformer tap changer, or inductors)
  - Status, control (manual or auto), feedback (TOP,TO,DP)
- Static VAR Compensators (SVC)
  - Status, computations, control (manual or auto), feedback (TOP, TO,DP)

### **Managing Constraints**

Managing Constraints includes activities, actions and conditions that are necessary to ensure that elements of the BES operate within design limits and constraints established for the reliability and operability of the BES. Aspects of the Managing Constraints include, but are not limited to:

- Available Transfer Capability (ATC) (TOP)
- Interchange schedules (TOP, RC)
- Generation re-dispatch and unit commit (GOP)
- Identify and monitor SOL's & IROL's (TOP, RC)
- Identify and monitor Flow gates (TOP, RC)

### **Monitoring and Control**

Monitoring and Control includes those activities, actions and conditions that provide monitoring and control of BES Elements. An example aspect of the Control and Operation function is:

- All methods of operating breakers and switches
  - SCADA (TOP, GOP)
  - Substation automation (TOP)

### **Restoration of BES**

The Restoration of BES Operations Service includes activities, actions and conditions necessary to go from a shutdown condition to an operating condition delivering electric power without external assistance. Aspects of the Restoration of BES function include, but are not limited to:

- Restoration including planned cranking path
  - Through black start units (TOP, GOP)
  - Through tie lines (TOP, GOP)
- Off-site power for nuclear facilities. (TOP, TO, BA, RC, DP, GO, GOP)
- Coordination (TOP, TO, BA, RC, DP, GO, GOP)

### **Situational Awareness**

The Situational Awareness function includes activities, actions and conditions established by policy, directive or standard operating procedure necessary to assess the current condition of the BES and anticipate effects of planned and unplanned changes to conditions. Aspects of the Situation Awareness function include:

- Monitoring and alerting (such as EMS alarms) (TOP, GOP, RC,BA)
- Change management (TOP,GOP,RC,BA)
- Current Day and Next Day planning (TOP)
- Contingency Analysis (RC)
- Frequency monitoring (BA, RC)

### **Inter-Entity Coordination**

The Inter-Entity coordination and communication function includes activities, actions, and conditions established by policy, directive, or standard operating procedure necessary for the coordination and communication between Responsible Entities to ensure the reliability and operability of the BES. Aspects of the Inter-Entity Coordination and Communication function include:

- Scheduled interchange (BA,TOP,GOP,RC)
- Facility operational data and status (TO, TOP, GO, GOP, RC, BA)
- Operational directives (TOP, RC, BA)

### **Applicability to Distribution Providers**

It is expected that only Distribution Providers that own or operate facilities that qualify in the Applicability section will be subject to these Version 5 Cyber Security Standards. Distribution Providers that do not own or operate any facility that qualifies are not subject to these standards. The qualifications are based on the requirements for registration as a Distribution Provider and on the requirements applicable to Distribution Providers in NERC Standard EOP-005.

### **Requirement R1:**

Requirement R1 implements the methodology for the categorization of BES Cyber Systems according to their impact on the BES. Using the traditional risk assessment equation, it reduces the measure of the risk to an impact (consequence) assessment, assuming the vulnerability index of 1 (the Systems are assumed to be vulnerable) and a probability of threat of 1 (100 percent). The criteria in Attachment 1 provide a measure of the impact of the BES assets supported by these BES Cyber Systems.

Responsible Entities are required to identify and categorize those BES Cyber Systems that have high and medium impact. BES Cyber Systems for BES assets not specified in Attachment 1, Criteria 1.1 – 1.4 and Criteria 2.1 – 2.11 default to low impact.

## **Attachment 1**

### **Overall Application**

In the application of the criteria in Attachment 1, Responsible Entities should note that the approach used is based on the impact of the BES Cyber System as measured by the bright-line criteria defined in Attachment 1.

- When the drafting team uses the term “Facilities”, there is some latitude to Responsible Entities to determine included Facilities. The term Facility is defined in the NERC Glossary of Terms as “A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.).” In most cases, the criteria refer to a group of Facilities in a given location that supports the reliable operation of the BES. For example, for Transmission assets, the substation may be designated as the group of Facilities. However, in a substation that includes equipment that supports BES operations along with equipment that only supports Distribution operations, the Responsible Entity may be better served to consider only the group of Facilities that supports BES operation. In that case, the Responsible Entity may designate the group of Facilities by location, with qualifications on the group of Facilities that supports reliable operation of the BES, as the Facilities that are subject to the criteria for categorization of BES Cyber Systems. Generation Facilities are separately discussed in the Generation section below. In CIP-002-5.1, these groups of Facilities, systems, and equipment are sometimes designated as BES assets. For example, an identified BES asset may be a named substation, generating plant, or Control Center. Responsible Entities have flexibility in how they group Facilities, systems, and equipment at a location.
- In certain cases, a BES Cyber System may be categorized by meeting multiple criteria. In such cases, the Responsible Entity may choose to document all criteria that result in the categorization. This will avoid inadvertent miscategorization when it no longer meets one of the criteria, but still meets another.
- It is recommended that each BES Cyber System should be listed by only one Responsible Entity. Where there is joint ownership, it is advisable that the owning Responsible Entities should formally agree on the designated Responsible Entity responsible for compliance with the standards.

### **High Impact Rating (H)**

This category includes those BES Cyber Systems, used by and at Control Centers (and the associated data centers included in the definition of Control Centers), that perform the functional obligations of the Reliability Coordinator (RC), Balancing Authority (BA), Transmission Operator (TOP), or Generator Operator (GOP), as defined under the Tasks heading of the applicable Function and the Relationship with Other Entities heading of the functional entity in the NERC Functional Model, and as scoped by the qualification in Attachment 1, Criteria 1.1, 1.2, 1.3 and 1.4. While those entities that have been registered as the above-named functional entities are specifically referenced, it must be noted that there may be agreements where some

of the functional obligations of a Transmission Operator may be delegated to a Transmission Owner (TO). In these cases, BES Cyber Systems at these TO Control Centers that perform these functional obligations would be subject to categorization as high impact. The criteria notably specifically emphasize functional obligations, not necessarily the RC, BA, TOP, or GOP facilities. One must note that the definition of Control Center specifically refers to reliability tasks for RCs, BAs, TOPs, and GOPs. A TO BES Cyber System in a TO facility that does not perform or does not have an agreement with a TOP to perform any of these functional tasks does not meet the definition of a Control Center. However, if that BES Cyber System operates any of the facilities that meet criteria in the Medium Impact category, that BES Cyber System would be categorized as a Medium Impact BES Cyber System.

The 3000 MW threshold defined in criterion 1.2 for BA Control Centers provides a sufficient differentiation of the threshold defined for Medium Impact BA Control Centers. An analysis of BA footprints shows that the majority of BAs with significant impact are covered under this criterion.

Additional thresholds as specified in the criteria apply for this category.

### **Medium Impact Rating (M)**

#### **Generation**

The criteria in Attachment 1's medium impact category that generally apply to Generation Owner and Operator (GO/GOP) Registered Entities are criteria 2.1, 2.3, 2.6, 2.9, and 2.11. Criterion 2.13 for BA Control Centers is also included here.

- Criterion 2.1 designates as medium impact those BES Cyber Systems that impact generation with a net Real Power capability exceeding 1500 MW. The 1500 MW criterion is sourced partly from the Contingency Reserve requirements in NERC standard BAL-002, whose purpose is "to ensure the Balancing Authority is able to utilize its Contingency Reserve to balance resources and demand and return Interconnection frequency within defined limits following a Reportable Disturbance." In particular, it requires that "as a minimum, the Balancing Authority or Reserve Sharing Group shall carry at least enough Contingency Reserve to cover the most severe single contingency." The drafting team used 1500 MW as a number derived from the most significant Contingency Reserves operated in various BAs in all regions.

In the use of net Real Power capability, the drafting team sought to use a value that could be verified through existing requirements as proposed by NERC standard MOD-024 and current development efforts in that area.

By using 1500 MW as a bright-line, the intent of the drafting team was to ensure that BES Cyber Systems with common mode vulnerabilities that could result in the loss of 1500 MW or more of generation at a single plant for a unit or group of units are adequately protected.

The drafting team also used additional time and value parameters to ensure the bright-lines and the values used to measure against them were relatively stable over the review period. Hence, where multiple values of net Real Power capability could be used for the Facilities' qualification against these bright-lines, the highest value was used.

- In Criterion 2.3, the drafting team sought to ensure that BES Cyber Systems for those generation Facilities that have been designated by the Planning Coordinator or Transmission Planner as necessary to avoid BES Adverse Reliability Impacts in the planning horizon of one year or more are categorized as medium impact. In specifying a planning horizon of one year or more, the intent is to ensure that those are units that are identified as a result of a "long term" reliability planning, i.e that the plans are spanning an operating period of at least 12 months: it does not mean that the operating day for the unit is necessarily beyond one year, but that the period that is being planned for is more than 1 year: it is specifically intended to avoid designating generation that is required to be run to remediate short term emergency reliability issues. These Facilities may be designated as "Reliability Must Run," and this designation is distinct from those generation Facilities designated as "must run" for market stabilization purposes. Because the use of the term "must run" creates some confusion in many areas, the drafting team chose to avoid using this term and instead drafted the requirement in more generic reliability language. In particular, the focus on preventing an Adverse Reliability Impact dictates that these units are designated as must run for reliability purposes beyond the local area. Those units designated as must run for voltage support in the local area would not generally be given this designation. In cases where there is no designated Planning Coordinator, the Transmission Planner is included as the Registered Entity that performs this designation.

If it is determined through System studies that a unit must run in order to preserve the reliability of the BES, such as due to a Category C3 contingency as defined in TPL-003, then BES Cyber Systems for that unit are categorized as medium impact.

The TPL standards require that, where the studies and plans indicate additional actions, that these studies and plans be communicated by the Planning Coordinator or Transmission Planner in writing to the Regional Entity/RRO. Actions necessary for the implementation of these plans by affected parties (generation owners/operators and Reliability Coordinators or other necessary party) are usually formalized in the form of an agreement and/or contract.

- Criterion 2.6 includes BES Cyber Systems for those Generation Facilities that have been identified as critical to the derivation of IROLs and their associated contingencies, as specified by FAC-014-2, **Establish and Communicate System Operating Limits**, R5.1.1 and R5.1.3.

IROLs may be based on dynamic System phenomena such as instability or voltage collapse. Derivation of these IROLs and their associated contingencies often considers the effect of generation inertia and AVR response.

- Criterion 2.9 categorizes BES Cyber Systems for Special Protection Systems and Remedial Action Schemes as medium impact. Special Protection Systems and Remedial Action Schemes may be implemented to prevent disturbances that would result in exceeding IROLs if they do not provide the function required at the time it is required or if it operates outside of the parameters it was designed for. Generation Owners and Generator Operators which own BES Cyber Systems for such Systems and schemes designate them as medium impact.
- Criterion 2.11 categorizes as medium impact BES Cyber Systems used by and at Control Centers that perform the functional obligations of the Generator Operator for an aggregate generation of 1500 MW or higher in a single interconnection, and that have not already been included in Part 1. .
- Criterion 2.13 categorizes as medium impact those BA Control Centers that “control” 1500 MW of generation or more in a single interconnection and that have not already been included in Part 1. The 1500 MW threshold is consistent with the impact level and rationale specified for Criterion 2.1.

### **Transmission**

*The SDT uses the phrases “Transmission Facilities at a single station or substation” and “Transmission stations or substations” to recognize the existence of both stations and substations. Many entities in industry consider a substation to be a location with physical borders (i.e. fence, wall, etc.) that contains at least an autotransformer. Locations also exist that do not contain autotransformers, and many entities in industry refer to those locations as stations (or switchyards). Therefore, the SDT chose to use both “station” and “substation” to refer to the locations where groups of Transmission Facilities exist.*

- Criteria 2.2, 2.4 through 2.10, and 2.12 in Attachment 1 are the criteria that are applicable to Transmission Owners and Operators. In many of the criteria, the impact threshold is defined as the capability of the failure or compromise of a System to result in exceeding one or more Interconnection Reliability Operating Limits (IROLs). Criterion 2.2 includes BES Cyber Systems for those Facilities in Transmission Systems that provide reactive resources to enhance and preserve the reliability of the BES. The nameplate value is used here because there is no NERC requirement to verify actual capability of these Facilities. The value of 1000 MVARs used in this criterion is a value deemed reasonable for the purpose of determining criticality.
- Criterion 2.4 includes BES Cyber Systems for any Transmission Facility at a substation operated at 500 kV or higher. While the drafting team felt that Facilities operated at 500 kV or higher did not require any further qualification for their role as components of the

backbone on the Interconnected BES, Facilities in the lower EHV range should have additional qualifying criteria for inclusion in the medium impact category.

It must be noted that if the collector bus for a generation plant (i.e. the plant is smaller in aggregate than the threshold set for generation in Criterion 2.1) is operated at 500kV, the collector bus should be considered a Generation Interconnection Facility, and not a Transmission Facility, according to the “Final Report from the Ad Hoc Group for Generation Requirements at the Transmission Interface.” This collector bus would not be a facility for a medium impact BES Cyber System because it does not significantly affect the 500kV Transmission grid; it only affects a plant which is below the generation threshold.

- Criterion 2.5 includes BES Cyber Systems for facilities at the lower end of BES Transmission with qualifications for inclusion if they are deemed highly likely to have significant impact on the BES. While the criterion has been specified as part of the rationale for requiring protection for significant impact on the BES, the drafting team included, in this criterion, additional qualifications that would ensure the required level of impact to the BES. The drafting team:
  - Excluded radial facilities that would only provide support for single generation facilities.
  - Specified interconnection to at least three transmission stations or substations to ensure that the level of impact would be appropriate.

The total aggregated weighted value of 3,000 was derived from weighted values related to three connected 345 kV lines and five connected 230 kV lines at a transmission station or substation. The total aggregated weighted value is used to account for the true impact to the BES, irrespective of line kV rating and mix of multiple kV rated lines.

Additionally, in NERC’s document “[Integrated Risk Assessment Approach – Refinement to Severity Risk Index](#)”, Attachment 1, the report used an average MVA line loading based on kV rating:

- 230 kV → 700 MVA
- 345 kV → 1,300 MVA
- 500 kV → 2,000 MVA
- 765 kV → 3,000 MVA

In the terms of applicable lines and connecting “other Transmission stations or substations” determinations, the following should be considered:

- For autotransformers in a station, Responsible Entities have flexibility in determining whether the groups of Facilities are considered a single substation or station location or multiple substations or stations. In most cases, Responsible Entities



would probably consider them as Facilities at a single substation or station unless geographically dispersed. In these cases of these transformers being within the “fence” of the substation or station, autotransformers may not count as separate connections to other stations. The use of common BES Cyber Systems may negate any rationale for any consideration otherwise. In the case of autotransformers that are geographically dispersed from a station location, the calculation would take into account the connections in and out of each station or substation location.

- Multiple-point (or multiple-tap) lines are considered to contribute a single weight value per line and affect the number of connections to other stations. Therefore, a single 230 kV multiple-point line between three Transmission stations or substations would contribute an aggregated weighted value of 700 and connect Transmission Facilities at a single station or substation to two other Transmission stations or substations.
- Multiple lines between two Transmission stations or substations are considered to contribute multiple weight values per line, but these multiple lines between the two stations only connect one station to one other station. Therefore, two 345 kV lines between two Transmission stations or substations would contribute an aggregated weighted value of 2600 and connect Transmission Facilities at a single station or substation to one other Transmission station or substation.

Criterion 2.5’s qualification for Transmission Facilities at a Transmission station or substation is based on 2 distinct conditions.

1. The first condition is that Transmission Facilities at a single station or substation where that station or substation connect, at voltage levels of 200 kV or higher to three (3) other stations or substations, to three other stations or substations. This qualification is meant to ensure that connections that operate at voltages of 500 kV or higher are included in the count of connections to other stations or substations as well.
2. The second qualification is that the aggregate value of all lines entering or leaving the station or substation must exceed 3000. This qualification does not include the consideration of lines operating at lower than 200 kV, or 500 kV or higher, the latter already qualifying as medium impact under criterion 2.4. : there is no value to be assigned to lines at voltages of less than 200 kV or 500 kV or higher in the table of values for the contribution to the aggregate value of 3000.

The Transmission Facilities at the station or substation must meet both qualifications to be considered as qualified under criterion 2.5.

- Criterion 2.6 include BES Cyber Systems for those Transmission Facilities that have been identified as critical to the derivation of IROLs and their associated contingencies, as

specified by FAC-014-2, **Establish and Communicate System Operating Limits**, R5.1.1 and R5.1.3.

- Criterion 2.7 is sourced from the NUC-001 NERC standard, Requirement R9.2.2, for the support of Nuclear Facilities. NUC-001 ensures that reliability of NPIR's are ensured through adequate coordination between the Nuclear Generator Owner/Operator and its Transmission provider "for the purpose of ensuring nuclear plant safe operation and shutdown." In particular, there are specific requirements to coordinate physical and cyber security protection of these interfaces.
- Criterion 2.8 designates as medium impact those BES Cyber Systems that impact Transmission Facilities necessary to directly support generation that meet the criteria in Criteria 2.1 (generation Facilities with output greater than 1500 MW) and 2.3 (generation Facilities generally designated as "must run" for wide area reliability in the planning horizon). The Responsible Entity can request a formal statement from the Generation owner as to the qualification of generation Facilities connected to their Transmission systems.
- Criterion 2.9 designates as medium impact those BES Cyber Systems for those Special Protection Systems (SPS), Remedial Action Schemes (RAS), or automated switching Systems installed to ensure BES operation within IROLs. The degradation, compromise or unavailability of these BES Cyber Systems would result in exceeding IROLs if they fail to operate as designed. By the definition of IROL, the loss or compromise of any of these have Wide Area impacts.
- Criterion 2.10 designates as medium impact those BES Cyber Systems for Systems or Elements that perform automatic Load shedding, without human operator initiation, of 300 MW or more. The SDT spent considerable time discussing the wording of Criterion 2.10, and chose the term "Each" to represent that the criterion applied to a discrete System or Facility. In the drafting of this criterion, the drafting team sought to include only those Systems that did not require human operator initiation, and targeted in particular those underfrequency load shedding (UFLS) Facilities and systems and undervoltage load shedding (UVLS) systems and Elements that would be subject to a regional Load shedding requirement to prevent Adverse Reliability Impact. These include automated UFLS systems or UVLS systems that are capable of Load shedding 300 MW or more. It should be noted that those qualifying systems which require a human operator to arm the system, but once armed, trigger automatically, are still to be considered as not requiring human operator initiation and should be designated as medium impact. The 300 MW threshold has been defined as the aggregate of the highest MW Load value, as defined by the applicable regional Load Shedding standards, for the preceding 12 months to account for seasonal fluctuations.

This particular threshold (300 MW) was provided in CIP, Version 1. The SDT believes that the threshold should be lower than the 1500MW generation requirement since it is specifically addressing UVLS and UFLS, which are last ditch efforts to save the Bulk Electric

System and hence requires a lower threshold. A review of UFLS tolerances defined within regional reliability standards for UFLS program requirements to date indicates that the historical value of 300 MW represents an adequate and reasonable threshold value for allowable UFLS operational tolerances.

In ERCOT, the Load acting as a Resource (“LaaR”) Demand Response Program is not part of the regional load shedding program, but an ancillary services market. In general, similar demand response programs that are not part of the NERC or regional reliability Load shedding programs, but are offered as components of an ancillary services market do not qualify under this criterion.

The language used in section 4 for UVLS and UFLS and in criterion 2.10 of Attachment 1 is designed to be consistent with requirements set in the PRC standards for UFLS and UVLS.

- Criterion 2.12 categorizes as medium impact those BES Cyber Systems used by and at Control Centers and associated data centers performing the functional obligations of a Transmission Operator and that have not already been categorized as high impact.
- Criterion 2.13 categorizes as Medium Impact those BA Control Centers that “control” 1500 MW of generation or more in a single Interconnection. The 1500 MW threshold is consistent with the impact level and rationale specified for Criterion 2.1.

### **Low Impact Rating (L)**

BES Cyber Systems not categorized in high impact or medium impact default to low impact. Note that low impact BES Cyber Systems do not require discrete identification.

### **Restoration Facilities**

- Several discussions on the CIP Version 5 standards suggest entities owning Blackstart Resources and Cranking Paths might elect to remove those services to avoid higher compliance costs. For example, one Reliability Coordinator reported a 25% reduction of Blackstart Resources as a result of the Version 1 language, and there could be more entities that make this choice under Version 5.

In response, the CIP Version 5 drafting team sought informal input from NERC’s Operating and Planning Committees. The committees indicate there has already been a reduction in Blackstart Resources because of increased CIP compliance costs, environmental rules, and other risks; continued inclusion within Version 5 at a category that would very significantly increase compliance costs can result in further reduction of a vulnerable pool.

The drafting team moved from the categorization of restoration assets such as Blackstart Resources and Cranking Paths as medium impact (as was the case in earlier drafts) to categorization of these assets as low impact as a result of these considerations. This will not relieve asset owners of all responsibilities, as would have been the case in CIP-002, Versions 1-4 (since only Cyber Assets with routable connectivity which are essential to

restoration assets are included in those versions). Under the low impact categorization, those assets will be protected in the areas of cyber security awareness, physical access control, and electronic access control, and they will have obligations regarding incident response. This represents a net gain to bulk power system reliability, however, since many of those assets do not meet criteria for inclusion under Versions 1-4.

Weighing the risks to overall BES reliability, the drafting team determined that this re-categorization represents the option that would be the least detrimental to restoration function and, thus, overall BES reliability. Removing Blackstart Resources and Cranking Paths from medium impact promotes overall reliability, as the likely alternative is fewer Blackstart Resources supporting timely restoration when needed.

BES Cyber Systems for generation resources that have been designated as Blackstart Resources in the Transmission Operator's restoration plan default to low impact. NERC Standard EOP-005-2 requires the Transmission Operator to have a Restoration Plan and to list its Blackstart Resources in its plan, as well as requirements to test these Resources. This criterion designates only those generation Blackstart Resources that have been designated as such in the Transmission Operator's restoration plan. The glossary term Blackstart Capability Plan has been retired.

Regarding concerns of communication to BES Asset Owners and Operators of their role in the Restoration Plan, Transmission Operators are required in NERC Standard EOP-005-2 to "provide the entities identified in its approved restoration plan with a description of any changes to their roles and specific tasks prior to the implementation date of the plan."

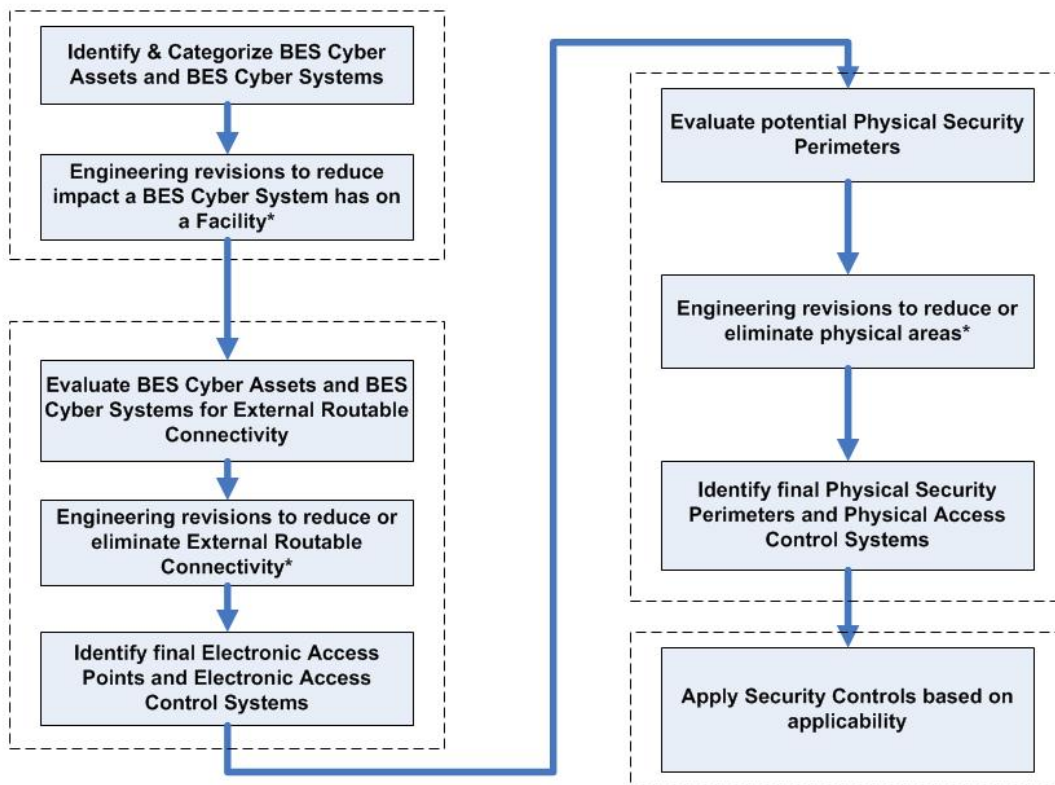
- BES Cyber Systems for Facilities and Elements comprising the Cranking Paths and meeting the initial switching requirements from the Blackstart Resource to the first Interconnection point of the generation unit(s) to be started, as identified in the Transmission Operator's restoration plan, default to the category of low impact: however, these systems are explicitly called out to ensure consideration for inclusion in the scope of the version 5 CIP standards. This requirement for inclusion in the scope is sourced from requirements in NERC standard EOP-005-2, which requires the Transmission Operator to include in its Restoration Plan the Cranking Paths and initial switching requirements from the Blackstart Resource and the unit(s) to be started.

Distribution Providers may note that they may have BES Cyber Systems that must be scoped in if they have Elements listed in the Transmission Operator's Restoration Plan that are components of the Cranking Path.

**Use Case: CIP Process Flow**

The following CIP use case process flow for a generator Operator/Owner was provided by a participant in the development of the Version 5 standards and is provided here as an example of a process used to identify and categorize BES Cyber Systems and BES Cyber Assets; review, develop, and implement strategies to mitigate overall risks; and apply applicable security controls.

**Overview (Generation Facility)**



\* - Engineering revisions will need to be reviewed for cost justification, operational safety requirements, support requirements, and technical limitations.

## Standard Development Timeline

*This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.*

### Development Steps Completed

1. SAR posted for comment (March 20, 2008).
2. SC authorized moving the SAR forward to standard development (July 10, 2008).
3. First posting for 60-day formal comment period and concurrent ballot (November 2011).
4. Second posting for 40-day formal comment period and concurrent ballot (April 2012).
5. Third posting for 30-day formal comment period and concurrent ballot (September 2012).

### Description of Current Draft

This is the fourth posting of Version 5 of the CIP Cyber Security Standards for a 10-day recirculation ballot. An initial concept paper, *Categorizing Cyber Systems — An Approach Based on BES Reliability Functions*, was posted for public comment in July 2009. An early draft consolidating CIP-002 – CIP-009, numbered CIP-010-1 and CIP-011-1, was posted for public informal comment in May 2010. A first posting of Version 5, which reverted to the original organization of the standards with some changes, was posted in November 2011 for a 60-day comment period and ballot. A second posting of Version 5 was posted in April 2012 for a 40-day comment period and ballot. A third posting of Version 5 was posted in September 2012 for a 30-day comment period and ballot. Version 5 addresses the balance of the FERC directives in its Order No. 706 approving Version 1 of the standards. This posting for recirculation ballot addresses the comments received from the third posting and ballot.

Anticipated Actions	Anticipated Date
Recirculation ballot	November 2012
BOT adoption	December 2012

## Effective Dates

1. **24 Months Minimum** – CIP-002-5.1 shall become effective on the later of July 1, 2015, or the first calendar day of the ninth calendar quarter after the effective date of the order providing applicable regulatory approval.
2. In those jurisdictions where no regulatory approval is required CIP-002-5.1 shall become effective on the first day of the ninth calendar quarter following Board of Trustees' approval, or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities.

## Version History

Version	Date	Action	Change Tracking
1	1/16/06	R3.2 — Change “Control Center” to “control center.”	3/24/06
2	9/30/09	Modifications to clarify the requirements and to bring the compliance elements into conformance with the latest guidelines for developing compliance elements of standards. Removal of reasonable business judgment. Replaced the RRO with the RE as a Responsible Entity. Rewording of Effective Date. Changed compliance monitor to Compliance Enforcement Authority.	
3	12/16/09	Updated version number from -2 to -3. Approved by the NERC Board of Trustees.	Update
3	3/31/10	Approved by FERC.	
4	12/30/10	Modified to add specific criteria for Critical Asset identification.	Update
4	1/24/11	Approved by the NERC Board of Trustees.	Update
5	TBD	Modified to coordinate with other CIP standards and to revise format to use RBS Template.	
<u>5.1</u>	<u>TBD</u>	<u>Replaced “Devices” with “Systems” in the of definition Electronic Access</u>	<u>Errata</u>

		<a href="#"><u>Control or Monitoring Systems in background section</u></a>	
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## Definitions of Terms Used in Standard

*See the associated “Definitions of Terms Used in Version 5 CIP Cyber Security Standards,” which consolidates and includes all newly defined or revised terms used in the proposed Version 5 CIP Cyber Security Standards.*

*When this standard has received ballot approval, the text boxes will be moved to the “Guidelines and Technical Basis” section of the Standard.*

## A. Introduction

1. **Title:** Cyber Security — BES Cyber System Categorization
2. **Number:** CIP-002-5.1
3. **Purpose:** To identify and categorize BES Cyber Systems and their associated BES Cyber Assets 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. Identification and categorization of BES Cyber Systems support appropriate protection against compromises that could lead to misoperation or instability in the BES.
4. **Applicability:**
  - 4.1. **Functional Entities:** For the purpose of the requirements contained herein, the following list of functional entities will be collectively referred to as “Responsible Entities.” For requirements in this standard where a specific functional entity or subset of functional entities are the applicable entity or entities, the functional entity or entities are specified explicitly.
    - 4.1.1. **Balancing Authority**
    - 4.1.2. **Distribution Provider that owns one or more of the following Facilities, systems, and equipment for the protection or restoration of the BES:**
      - 4.1.2.1. Each underfrequency load shedding (UFLS) or undervoltage load shedding (UVLS) system that:
        - 4.1.2.1.1. is part of a Load shedding program that is subject to one or more requirements in a NERC or Regional Reliability Standard; and
        - 4.1.2.1.2. performs automatic Load shedding under a common control system owned by the Responsible Entity, without human operator initiation, of 300 MW or more.
      - 4.1.2.2. Each Special Protection System or Remedial Action Scheme where the Special Protection System or Remedial Action Scheme is subject to one or more requirements in a NERC or Regional Reliability Standard.
      - 4.1.2.3. Each Protection System (excluding UFLS and UVLS) that applies to Transmission where the Protection System is subject to one or more requirements in a NERC or Regional Reliability Standard.
      - 4.1.2.4. Each Cranking Path and group of Elements meeting the initial switching requirements from a Blackstart Resource up to and including the first interconnection point of the starting station service of the next generation unit(s) to be started.

- 4.1.3. Generator Operator**
- 4.1.4. Generator Owner**
- 4.1.5. Interchange Coordinator or Interchange Authority**
- 4.1.6. Reliability Coordinator**
- 4.1.7. Transmission Operator**
- 4.1.8. Transmission Owner**

**4.2. Facilities:** For the purpose of the requirements contained herein, the following Facilities, systems, and equipment owned by each Responsible Entity in 4.1 above are those to which these requirements are applicable. For requirements in this standard where a specific type of Facilities, system, or equipment or subset of Facilities, systems, and equipment are applicable, these are specified explicitly.

**4.2.1. Distribution Provider:** One or more of the following Facilities, systems and equipment owned by the Distribution Provider for the protection or restoration of the BES:

**4.2.1.1.** Each UFLS or UVLS System that:

**4.2.1.1.1.** is part of a Load shedding program that is subject to one or more requirements in a NERC or Regional Reliability Standard; and

**4.2.1.1.2.** performs automatic Load shedding under a common control system owned by the Responsible Entity, without human operator initiation, of 300 MW or more.

**4.2.1.2.** Each Special Protection System or Remedial Action Scheme where the Special Protection System or Remedial Action Scheme is subject to one or more requirements in a NERC or Regional Reliability Standard.

**4.2.1.3.** Each Protection System (excluding UFLS and UVLS) that applies to Transmission where the Protection System is subject to one or more requirements in a NERC or Regional Reliability Standard.

**4.2.1.4.** Each Cranking Path and group of Elements meeting the initial switching requirements from a Blackstart Resource up to and including the first interconnection point of the starting station service of the next generation unit(s) to be started.

**4.2.2. Responsible Entities listed in 4.1 other than Distribution Providers:**

All BES Facilities.

**4.2.3. Exemptions:** The following are exempt from Standard CIP-002-5.1:

**4.2.3.1.** Cyber Assets at Facilities regulated by the Canadian Nuclear Safety Commission.

**4.2.3.2.** Cyber Assets associated with communication networks and data communication links between discrete Electronic Security Perimeters.

**4.2.3.3.** The systems, structures, and components that are regulated by the Nuclear Regulatory Commission under a cyber security plan pursuant to 10 C.F.R. Section 73.54.

**4.2.3.4.** For Distribution Providers, the systems and equipment that are not included in section 4.2.1 above.

## **5. Background:**

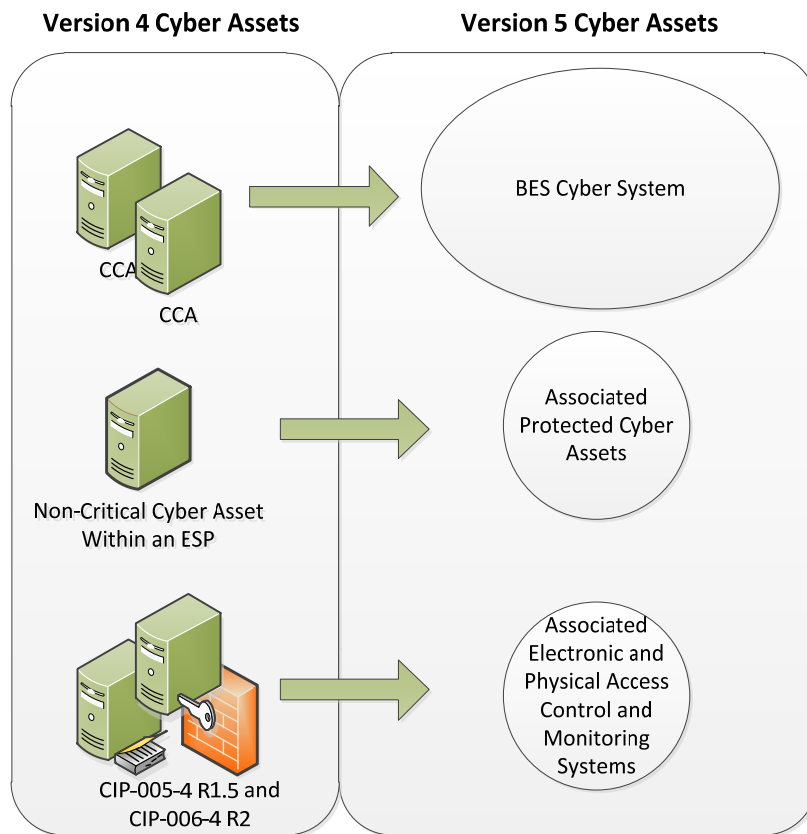
This standard provides “bright-line” criteria for applicable Responsible Entities to categorize their BES Cyber Systems based on the impact of their associated Facilities, systems, and equipment, which, if destroyed, degraded, misused, or otherwise rendered unavailable, would affect the reliable operation of the Bulk Electric System. Several concepts provide the basis for the approach to the standard.

Throughout the standards, unless otherwise stated, bulleted items in the requirements are items that are linked with an “or,” and numbered items are items that are linked with an “and.”

Many references in the Applicability section and the criteria in Attachment 1 of CIP-002 use a threshold of 300 MW for UFLS and UVLS. This particular threshold of 300 MW for UVLS and UFLS was provided in Version 1 of the CIP Cyber Security Standards. The threshold remains at 300 MW since it is specifically addressing UVLS and UFLS, which are last ditch efforts to save the Bulk Electric System. A review of UFLS tolerances defined within regional reliability standards for UFLS program requirements to date indicates that the historical value of 300 MW represents an adequate and reasonable threshold value for allowable UFLS operational tolerances.

### **BES Cyber Systems**

One of the fundamental differences between Versions 4 and 5 of the CIP Cyber Security Standards is the shift from identifying Critical Cyber Assets to identifying BES Cyber Systems. This change results from the drafting team’s review of the NIST Risk Management Framework and the use of an analogous term “information system” as the target for categorizing and applying security controls.



In transitioning from Version 4 to Version 5, a BES Cyber System can be viewed simply as a grouping of Critical Cyber Assets (as that term is used in Version 4). The CIP Cyber Security Standards use the “BES Cyber System” term primarily to provide a higher level for referencing the object of a requirement. For example, it becomes possible to apply requirements dealing with recovery and malware protection to a grouping rather than individual Cyber Assets, and it becomes clearer in the requirement that malware protection applies to the system as a whole and may not be necessary for every individual device to comply.

Another reason for using the term “BES Cyber System” is to provide a convenient level at which a Responsible Entity can organize their documented implementation of the requirements and compliance evidence. Responsible Entities can use the well-developed concept of a *security plan* for each BES Cyber System to document the programs, processes, and plans in place to comply with security requirements.

It 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. For example, the Responsible Entity might choose to view an entire plant control system as a single BES Cyber System, or it might choose to view certain components of the plant control system as distinct BES Cyber Systems. 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.

### **Reliable Operation of the BES**

The scope of the CIP Cyber Security Standards is restricted to BES Cyber Systems that would impact the reliable operation of the BES. In order to identify BES Cyber Systems, Responsible Entities determine whether the BES Cyber Systems perform or support any BES reliability function according to those reliability tasks identified for their reliability function and the corresponding functional entity's responsibilities as defined in its relationships with other functional entities in the NERC Functional Model. This ensures that the *initial* scope for consideration includes only those BES Cyber Systems and their associated BES Cyber Assets that perform or support the reliable operation of the BES. The definition of BES Cyber Asset provides the basis for this scoping.

### **Real-time Operations**

One characteristic of the BES Cyber Asset is a real-time scoping characteristic. The time horizon that is significant for BES Cyber Systems and BES Cyber Assets subject to the application of these Version 5 CIP Cyber Security Standards is defined as that which is material to real-time operations for the reliable operation of the BES. To provide a better defined time horizon than "Real-time," BES Cyber Assets are those Cyber Assets that, if rendered unavailable, degraded, or misused, would adversely impact the reliable operation of the BES within 15 minutes of the activation or exercise of the compromise. This time window must not include in its consideration the activation of redundant BES Cyber Assets or BES Cyber Systems: from the cyber security standpoint, redundancy does not mitigate cyber security vulnerabilities.

### **Categorization Criteria**

The criteria defined in Attachment 1 are used to categorize BES Cyber Systems into impact categories. Requirement 1 only requires the discrete identification of BES Cyber Systems for those in the high impact and medium impact categories. All BES Cyber Systems for Facilities not included in Attachment 1 – Impact Rating Criteria, Criteria 1.1 to 1.4 and Criteria 2.1 to 2.11 default to be low impact.

This general process of categorization of BES Cyber Systems based on impact on the reliable operation of the BES is consistent with risk management approaches for the purpose of application of cyber security requirements in the remainder of the Version 5 CIP Cyber Security Standards.

### **Electronic Access Control or Monitoring Systems, Physical Access Control Systems, and Protected Cyber Assets that are associated with BES Cyber Systems**

BES Cyber Systems have associated Cyber Assets, which, if compromised, pose a threat to the BES Cyber System by virtue of: (a) their location within the Electronic Security Perimeter (Protected Cyber Assets), or (b) the security control function they perform (Electronic Access Control or Monitoring Systems and Physical Access Control Systems). These Cyber Assets include:

**Electronic Access Control or Monitoring Systems (“EACMS”)** – Examples include: Electronic Access Points, Intermediate ~~Devices~~Systems, authentication servers (e.g., RADIUS servers, Active Directory servers, Certificate Authorities), security event monitoring systems, and intrusion detection systems.

**Physical Access Control Systems (“PACS”)**– Examples include: authentication servers, card systems, and badge control systems.

**Protected Cyber Assets (“PCA”)** – Examples may include, to the extent they are within the ESP: file servers, ftp servers, time servers, LAN switches, networked printers, digital fault recorders, and emission monitoring systems.

## B. Requirements and Measures

### **Rationale – R1:**

BES Cyber Systems at each site location have varying impact on the reliable operation of the Bulk Electric System. Attachment 1 provides a set of “bright-line” criteria that the Responsible Entity must use to identify these BES Cyber Systems in accordance with the impact on the BES. BES Cyber Systems must be identified and categorized according to their impact so that the appropriate measures can be applied, commensurate with their impact. These impact categories will be the basis for the application of appropriate requirements in CIP-003-CIP-011.

- R1.** Each Responsible Entity shall implement a process that considers each of the following assets for purposes of parts 1.1 through 1.3: [*Violation Risk Factor: High*][*Time Horizon: Operations Planning*]
- 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).
- M1.** Acceptable evidence includes, but is not limited to, dated electronic or physical lists required by Requirement R1, and Parts 1.1 and 1.2.



### **Rationale – R2**

The lists required by Requirement R1 are reviewed on a periodic basis to ensure that all BES Cyber Systems required to be categorized have been properly identified and categorized. The miscategorization or non-categorization of a BES Cyber System can lead to the application of inadequate or non-existent cyber security controls that can lead to compromise or misuse that can affect the real-time operation of the BES. The CIP Senior Manager's approval ensures proper oversight of the process by the appropriate Responsible Entity personnel.

- R2.** The Responsible Entity shall: [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning*]
- 2.1** Review the identifications in Requirement R1 and its parts (and update them if there are changes identified) at least once every 15 calendar months, even if it has no identified items in Requirement R1, and
  - 2.2** Have its CIP Senior Manager or delegate approve the identifications required by Requirement R1 at least once every 15 calendar months, even if it has no identified items in Requirement R1.
- M2.** Acceptable evidence includes, but is not limited to, electronic or physical dated records to demonstrate that the Responsible Entity has reviewed and updated, where necessary, the identifications required in Requirement R1 and its parts, and has had its CIP Senior Manager or delegate approve the identifications required in Requirement R1 and its parts at least once every 15 calendar months, even if it has none identified in Requirement R1 and its parts, as required by Requirement R2.

## C. Compliance

### 1. Compliance Monitoring Process:

#### 1.1. Compliance Enforcement Authority:

The Regional Entity shall serve as the Compliance Enforcement Authority (“CEA”) unless the applicable entity is owned, operated, or controlled by the Regional Entity. In such cases the ERO or a Regional Entity approved by FERC or other applicable governmental authority shall serve as the CEA.

#### 1.2. Evidence Retention:

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the CEA may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Responsible Entity shall keep data or evidence to show compliance as identified below unless directed by its CEA to retain specific evidence for a longer period of time as part of an investigation:

- Each Responsible Entity shall retain evidence of each requirement in this standard for three calendar years.
- If a Responsible Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time specified above, whichever is longer.
- The CEA shall keep the last audit records and all requested and submitted subsequent audit records.

#### 1.3. Compliance Monitoring and Assessment Processes:

- Compliance Audit
- Self-Certification
- Spot Checking
- Compliance Investigation
- Self-Reporting
- Complaint

#### 1.4. Additional Compliance Information

- None

**D. Regional Variances**

None.

**E. Interpretations**

None.

**F. Associated Documents**

None.

## **CIP-002-5.1 - Attachment 1**

### **Impact Rating Criteria**

*The criteria defined in Attachment 1 do not constitute stand-alone compliance requirements, but are criteria characterizing the level of impact and are referenced by requirements.*

#### **1. High Impact Rating (H)**

Each BES Cyber System used by and located at any of the following:

- 1.1.** Each Control Center or backup Control Center used to perform the functional obligations of the Reliability Coordinator.
- 1.2.** Each Control Center or backup Control Center used to perform the functional obligations of the Balancing Authority: 1) for generation equal to or greater than an aggregate of 3000 MW in a single Interconnection, or 2) for one or more of the assets that meet criterion 2.3, 2.6, or 2.9.
- 1.3.** Each Control Center or backup Control Center used to perform the functional obligations of the Transmission Operator for one or more of the assets that meet criterion 2.2, 2.4, 2.5, 2.7, 2.8, 2.9, or 2.10.
- 1.4.** Each Control Center or backup Control Center used to perform the functional obligations of the Generator Operator for one or more of the assets that meet criterion 2.1, 2.3, 2.6, or 2.9.

#### **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.
- 2.2.** Each BES reactive resource or group of resources at a single location (excluding generation Facilities) with an aggregate maximum Reactive Power nameplate rating of 1000 MVAR or greater (excluding those at generation Facilities). 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 resources that in aggregate equal or exceed 1000 MVAR.

- 2.3. Each generation Facility that its Planning Coordinator or Transmission Planner designates, and informs the Generator Owner or Generator Operator, as necessary to avoid an Adverse Reliability Impact in the planning horizon of more than one year.
- 2.4. Transmission Facilities operated at 500 kV or higher. For the purpose of this criterion, the collector bus for a generation plant is not considered a Transmission Facility, but is part of the generation interconnection Facility.
- 2.5. Transmission Facilities that are operating between 200 kV and 499 kV at a single station or substation, where the station or substation is connected at 200 kV or higher voltages to three or more other Transmission stations or substations and has an "aggregate weighted value" exceeding 3000 according to the table below. The "aggregate weighted value" for a single station or substation is determined by summing the "weight value per line" shown in the table below for each incoming and each outgoing BES Transmission Line that is connected to another Transmission station or substation. For the purpose of this criterion, the collector bus for a generation plant is not considered a Transmission Facility, but is part of the generation interconnection Facility.

Voltage Value of a Line	Weight Value per Line
less than 200 kV (not applicable)	(not applicable)
200 kV to 299 kV	700
300 kV to 499 kV	1300
500 kV and above	0

- 2.6. Generation at a single plant location or Transmission Facilities at a single station or substation location that are identified by its Reliability Coordinator, Planning Coordinator, or Transmission Planner as critical to the derivation of Interconnection Reliability Operating Limits (IROLs) and their associated contingencies.
- 2.7. Transmission Facilities identified as essential to meeting Nuclear Plant Interface Requirements.
- 2.8. Transmission Facilities, including generation interconnection Facilities, providing the generation interconnection required to connect generator output to the Transmission Systems that, if destroyed, degraded, misused, or otherwise rendered unavailable, would result in the loss of the generation Facilities identified by any Generator Owner as a result of its application of Attachment 1, criterion 2.1 or 2.3.
- 2.9. Each Special Protection System (SPS), Remedial Action Scheme (RAS), or automated switching System that operates BES Elements, that, if destroyed, degraded, misused or otherwise rendered unavailable, would cause one or more Interconnection Reliability Operating Limits (IROLs) violations for failure to operate as designed or cause a reduction in one or more IROLs if destroyed, degraded, misused, or otherwise rendered unavailable.

- 2.10.** Each system or group of Elements that performs automatic Load shedding under a common control system, without human operator initiation, of 300 MW or more implementing undervoltage load shedding (UVLS) or underfrequency load shedding (UFLS) under a load shedding program that is subject to one or more requirements in a NERC or regional reliability standard.
- 2.11.** Each Control Center or backup Control Center, not already included in High Impact Rating (H) above, used to perform the functional obligations of the Generator Operator for an aggregate highest rated net Real Power capability of the preceding 12 calendar months equal to or exceeding 1500 MW in a single Interconnection.
- 2.12.** Each Control Center or backup Control Center used to perform the functional obligations of the Transmission Operator not included in High Impact Rating (H), above.
- 2.13.** Each Control Center or backup Control Center, not already included in High Impact Rating (H) above, used to perform the functional obligations of the Balancing Authority for generation equal to or greater than an aggregate of 1500 MW in a single Interconnection.

### **3. Low Impact Rating (L)**

BES Cyber Systems not included in Sections 1 or 2 above that are associated with any of the following assets and that meet the applicability qualifications in Section 4 - Applicability, part 4.2 – Facilities, of this standard:

- 3.1.** Control Centers and backup Control Centers.
- 3.2.** Transmission stations and substations.
- 3.3.** Generation resources.
- 3.4.** Systems and facilities critical to system restoration, including Blackstart Resources and Cranking Paths and initial switching requirements.
- 3.5.** Special Protection Systems that support the reliable operation of the Bulk Electric System.
- 3.6.** For Distribution Providers, Protection Systems specified in Applicability section 4.2.1 above.

## Guidelines and Technical Basis

### Section 4 – Scope of Applicability of the CIP Cyber Security Standards

Section “4. Applicability” of the standards provides important information for Responsible Entities to determine the scope of the applicability of the CIP Cyber Security Requirements.

Section “4.1. Functional Entities” is a list of NERC functional entities to which the standard applies. If the entity is registered as one or more of the functional entities listed in section 4.1, then the NERC CIP Cyber Security Standards apply. Note that there is a qualification in section 4.1 that restricts the applicability in the case of Distribution Providers to only those that own certain types of systems and equipment listed in 4.2.

Section “4.2. Facilities” defines the scope of the Facilities, systems, and equipment owned by the Responsible Entity, as qualified in section 4.1, that is subject to the requirements of the standard. In addition to the set of BES Facilities, Control Centers, and other systems and equipment, the list includes the qualified set of systems and equipment owned by Distribution Providers. While the NERC Glossary term “Facilities” already includes the BES characteristic, the additional use of the term BES here is meant to reinforce the scope of applicability of these Facilities where it is used, especially in this applicability scoping section. This in effect sets the scope of Facilities, systems, and equipment that is subject to the standards. This section is especially significant in CIP-002-5.1 and represents the total scope of Facilities, systems, and equipment to which the criteria in Attachment 1 apply. This is important because it determines the balance of these Facilities, systems, and equipment that are Low Impact once those that qualify under the High and Medium Impact categories are filtered out.

For the purpose of identifying groups of Facilities, systems, and equipment, whether by location or otherwise, the Responsible Entity identifies assets as described in Requirement R1 of CIP-002-5.1. This is a process familiar to Responsible Entities that have to comply with versions 1, 2, 3, and 4 of the CIP standards for Critical Assets. As in versions 1, 2, 3, and 4, Responsible Entities may use substations, generation plants, and Control Centers at single site locations as identifiers of these groups of Facilities, systems, and equipment.

#### **CIP-002-5.1**

CIP-002-5.1 requires that applicable Responsible Entities categorize their BES Cyber Systems and associated BES Cyber Assets according to the criteria in Attachment 1. A BES Cyber Asset includes in its definition, “...that if rendered unavailable, degraded, or misused would, within 15 minutes adversely impact the reliable operation of the BES.”

The following provides guidance that a Responsible Entity may use to identify the BES Cyber Systems that would be in scope. The concept of BES reliability operating service is useful in providing Responsible Entities with the option of a defined process for scoping those BES Cyber

Systems that would be subject to CIP-002-5.1. The concept includes a number of named BES reliability operating services. These named services include:

- Dynamic Response to BES conditions
- Balancing Load and Generation
- Controlling Frequency (Real Power)
- Controlling Voltage (Reactive Power)
- Managing Constraints
- Monitoring & Control
- Restoration of BES
- Situational Awareness
- Inter-Entity Real-Time Coordination and Communication

Responsibility for the reliable operation of the BES is spread across all Entity Registrations. Each entity registration has its own special contribution to reliable operations and the following discussion helps identify which entity registration, in the context of those functional entities to which these CIP standards apply, performs which reliability operating service, as a process to identify BES Cyber Systems that would be in scope. The following provides guidance for Responsible Entities to determine applicable reliability operations services according to their Function Registration type.

Entity Registration	RC	BA	TOP	TO	DP	GOP	GO
Dynamic Response		X	X	X	X	X	X
Balancing Load & Generation	X	X	X	X	X	X	X
Controlling Frequency		X				X	X
Controlling Voltage			X	X	X		X
Managing Constraints	X		X			X	
Monitoring and Control			X			X	
Restoration			X			X	
Situation Awareness	X	X	X			X	
Inter-Entity coordination	X	X	X	X		X	X

### Dynamic Response

The Dynamic Response Operating Service includes those actions performed by BES Elements or subsystems which are automatically triggered to initiate a response to a BES condition. These actions are triggered by a single element or control device or a combination of these elements or devices in concert to perform an action or cause a condition in reaction to the triggering action or condition. The types of dynamic responses that may be considered as potentially having an impact on the BES are:



- Spinning reserves (contingency reserves)
  - Providing actual reserve generation when called upon (GO,GOP)
  - Monitoring that reserves are sufficient (BA)
- Governor Response
  - Control system used to actuate governor response (GO)
- Protection Systems (transmission & generation)
  - Lines, buses, transformers, generators (DP, TO, TOP, GO, GOP)
  - Zone protection for breaker failure (DP, TO, TOP)
  - Breaker protection (DP, TO, TOP)
  - Current, frequency, speed, phase (TO, TOP, GO, GOP)
- Special Protection Systems or Remedial Action Schemes
  - Sensors, relays, and breakers, possibly software (DP, TO, TOP)
- Under and Over Frequency relay protection (includes automatic load shedding)
  - Sensors, relays & breakers (DP)
- Under and Over Voltage relay protection (includes automatic load shedding)
  - Sensors, relays & breakers (DP)
- Power System Stabilizers (GO)

### **Balancing Load and Generation**

The Balancing Load and Generation Operations Service includes activities, actions and conditions necessary for monitoring and controlling generation and load in the operations planning horizon and in real-time. Aspects of the Balancing Load and Generation function include, but are not limited to:

- Calculation of Area Control Error (ACE)
  - Field data sources (real time tie flows, frequency sources, time error, etc) (TO, TOP)
  - Software used to perform calculation (BA)
- Demand Response
  - Ability to identify load change need (BA)
  - Ability to implement load changes (TOP, DP)
- Manually Initiated Load shedding
  - Ability to identify load change need (BA)
  - Ability to implement load changes (TOP, DP)

- Non-spinning reserve (contingency reserve)
  - Know generation status, capability, ramp rate, start time (GO, BA)
  - Start units and provide energy (GOP)

### **Controlling Frequency (Real Power)**

The Controlling Frequency Operations Service includes activities, actions and conditions which ensure, in real time, that frequency remains within bounds acceptable for the reliability or operability of the BES. Aspects of the Controlling Frequency function include, but are limited to:

- Generation Control (such as AGC)
  - ACE, current generator output, ramp rate, unit characteristics (BA, GOP, GO)
  - Software to calculate unit adjustments (BA)
  - Transmit adjustments to individual units (GOP)
  - Unit controls implementing adjustments (GOP)
- Regulation (regulating reserves)
  - Frequency source, schedule (BA)
  - Governor control system (GO)

### **Controlling Voltage (Reactive Power)**

The Controlling Voltage Operations Service includes activities, actions and conditions which ensure, in real time, that voltage remains within bounds acceptable for the reliability or operability of the BES. Aspects of the Controlling Voltage function include, but are not limited to:

- Automatic Voltage Regulation (AVR)
  - Sensors, stator control system, feedback (GO)
- Capacitive resources
  - Status, control (manual or auto), feedback (TOP, TO,DP)
- Inductive resources (transformer tap changer, or inductors)
  - Status, control (manual or auto), feedback (TOP,TO,DP)
- Static VAR Compensators (SVC)
  - Status, computations, control (manual or auto), feedback (TOP, TO,DP)

### **Managing Constraints**

Managing Constraints includes activities, actions and conditions that are necessary to ensure that elements of the BES operate within design limits and constraints established for the reliability and operability of the BES. Aspects of the Managing Constraints include, but are not limited to:

- Available Transfer Capability (ATC) (TOP)
- Interchange schedules (TOP, RC)
- Generation re-dispatch and unit commit (GOP)
- Identify and monitor SOL's & IROL's (TOP, RC)
- Identify and monitor Flow gates (TOP, RC)

### **Monitoring and Control**

Monitoring and Control includes those activities, actions and conditions that provide monitoring and control of BES Elements. An example aspect of the Control and Operation function is:

- All methods of operating breakers and switches
  - SCADA (TOP, GOP)
  - Substation automation (TOP)

### **Restoration of BES**

The Restoration of BES Operations Service includes activities, actions and conditions necessary to go from a shutdown condition to an operating condition delivering electric power without external assistance. Aspects of the Restoration of BES function include, but are not limited to:

- Restoration including planned cranking path
  - Through black start units (TOP, GOP)
  - Through tie lines (TOP, GOP)
- Off-site power for nuclear facilities. (TOP, TO, BA, RC, DP, GO, GOP)
- Coordination (TOP, TO, BA, RC, DP, GO, GOP)

### **Situational Awareness**

The Situational Awareness function includes activities, actions and conditions established by policy, directive or standard operating procedure necessary to assess the current condition of the BES and anticipate effects of planned and unplanned changes to conditions. Aspects of the Situation Awareness function include:

- Monitoring and alerting (such as EMS alarms) (TOP, GOP, RC,BA)
- Change management (TOP,GOP,RC,BA)
- Current Day and Next Day planning (TOP)
- Contingency Analysis (RC)
- Frequency monitoring (BA, RC)

### **Inter-Entity Coordination**

The Inter-Entity coordination and communication function includes activities, actions, and conditions established by policy, directive, or standard operating procedure necessary for the coordination and communication between Responsible Entities to ensure the reliability and operability of the BES. Aspects of the Inter-Entity Coordination and Communication function include:

- Scheduled interchange (BA,TOP,GOP,RC)
- Facility operational data and status (TO, TOP, GO, GOP, RC, BA)
- Operational directives (TOP, RC, BA)

### **Applicability to Distribution Providers**

It is expected that only Distribution Providers that own or operate facilities that qualify in the Applicability section will be subject to these Version 5 Cyber Security Standards. Distribution Providers that do not own or operate any facility that qualifies are not subject to these standards. The qualifications are based on the requirements for registration as a Distribution Provider and on the requirements applicable to Distribution Providers in NERC Standard EOP-005.

### **Requirement R1:**

Requirement R1 implements the methodology for the categorization of BES Cyber Systems according to their impact on the BES. Using the traditional risk assessment equation, it reduces the measure of the risk to an impact (consequence) assessment, assuming the vulnerability index of 1 (the Systems are assumed to be vulnerable) and a probability of threat of 1 (100 percent). The criteria in Attachment 1 provide a measure of the impact of the BES assets supported by these BES Cyber Systems.

Responsible Entities are required to identify and categorize those BES Cyber Systems that have high and medium impact. BES Cyber Systems for BES assets not specified in Attachment 1, Criteria 1.1 – 1.4 and Criteria 2.1 – 2.11 default to low impact.

## **Attachment 1**

### **Overall Application**

In the application of the criteria in Attachment 1, Responsible Entities should note that the approach used is based on the impact of the BES Cyber System as measured by the bright-line criteria defined in Attachment 1.

- When the drafting team uses the term “Facilities”, there is some latitude to Responsible Entities to determine included Facilities. The term Facility is defined in the NERC Glossary of Terms as “A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.).” In most cases, the criteria refer to a group of Facilities in a given location that supports the reliable operation of the BES. For example, for Transmission assets, the substation may be designated as the group of Facilities. However, in a substation that includes equipment that supports BES operations along with equipment that only supports Distribution operations, the Responsible Entity may be better served to consider only the group of Facilities that supports BES operation. In that case, the Responsible Entity may designate the group of Facilities by location, with qualifications on the group of Facilities that supports reliable operation of the BES, as the Facilities that are subject to the criteria for categorization of BES Cyber Systems. Generation Facilities are separately discussed in the Generation section below. In CIP-002-5.1, these groups of Facilities, systems, and equipment are sometimes designated as BES assets. For example, an identified BES asset may be a named substation, generating plant, or Control Center. Responsible Entities have flexibility in how they group Facilities, systems, and equipment at a location.
- In certain cases, a BES Cyber System may be categorized by meeting multiple criteria. In such cases, the Responsible Entity may choose to document all criteria that result in the categorization. This will avoid inadvertent miscategorization when it no longer meets one of the criteria, but still meets another.
- It is recommended that each BES Cyber System should be listed by only one Responsible Entity. Where there is joint ownership, it is advisable that the owning Responsible Entities should formally agree on the designated Responsible Entity responsible for compliance with the standards.

### **High Impact Rating (H)**

This category includes those BES Cyber Systems, used by and at Control Centers (and the associated data centers included in the definition of Control Centers), that perform the functional obligations of the Reliability Coordinator (RC), Balancing Authority (BA), Transmission Operator (TOP), or Generator Operator (GOP), as defined under the Tasks heading of the applicable Function and the Relationship with Other Entities heading of the functional entity in the NERC Functional Model, and as scoped by the qualification in Attachment 1, Criteria 1.1, 1.2, 1.3 and 1.4. While those entities that have been registered as the above-named functional entities are specifically referenced, it must be noted that there may be agreements where some

of the functional obligations of a Transmission Operator may be delegated to a Transmission Owner (TO). In these cases, BES Cyber Systems at these TO Control Centers that perform these functional obligations would be subject to categorization as high impact. The criteria notably specifically emphasize functional obligations, not necessarily the RC, BA, TOP, or GOP facilities. One must note that the definition of Control Center specifically refers to reliability tasks for RCs, BAs, TOPs, and GOPs. A TO BES Cyber System in a TO facility that does not perform or does not have an agreement with a TOP to perform any of these functional tasks does not meet the definition of a Control Center. However, if that BES Cyber System operates any of the facilities that meet criteria in the Medium Impact category, that BES Cyber System would be categorized as a Medium Impact BES Cyber System.

The 3000 MW threshold defined in criterion 1.2 for BA Control Centers provides a sufficient differentiation of the threshold defined for Medium Impact BA Control Centers. An analysis of BA footprints shows that the majority of BAs with significant impact are covered under this criterion.

Additional thresholds as specified in the criteria apply for this category.

### **Medium Impact Rating (M)**

#### **Generation**

The criteria in Attachment 1's medium impact category that generally apply to Generation Owner and Operator (GO/GOP) Registered Entities are criteria 2.1, 2.3, 2.6, 2.9, and 2.11. Criterion 2.13 for BA Control Centers is also included here.

- Criterion 2.1 designates as medium impact those BES Cyber Systems that impact generation with a net Real Power capability exceeding 1500 MW. The 1500 MW criterion is sourced partly from the Contingency Reserve requirements in NERC standard BAL-002, whose purpose is "to ensure the Balancing Authority is able to utilize its Contingency Reserve to balance resources and demand and return Interconnection frequency within defined limits following a Reportable Disturbance." In particular, it requires that "as a minimum, the Balancing Authority or Reserve Sharing Group shall carry at least enough Contingency Reserve to cover the most severe single contingency." The drafting team used 1500 MW as a number derived from the most significant Contingency Reserves operated in various BAs in all regions.

In the use of net Real Power capability, the drafting team sought to use a value that could be verified through existing requirements as proposed by NERC standard MOD-024 and current development efforts in that area.

By using 1500 MW as a bright-line, the intent of the drafting team was to ensure that BES Cyber Systems with common mode vulnerabilities that could result in the loss of 1500 MW or more of generation at a single plant for a unit or group of units are adequately protected.

The drafting team also used additional time and value parameters to ensure the bright-lines and the values used to measure against them were relatively stable over the review period. Hence, where multiple values of net Real Power capability could be used for the Facilities' qualification against these bright-lines, the highest value was used.

- In Criterion 2.3, the drafting team sought to ensure that BES Cyber Systems for those generation Facilities that have been designated by the Planning Coordinator or Transmission Planner as necessary to avoid BES Adverse Reliability Impacts in the planning horizon of one year or more are categorized as medium impact. In specifying a planning horizon of one year or more, the intent is to ensure that those are units that are identified as a result of a "long term" reliability planning, i.e that the plans are spanning an operating period of at least 12 months: it does not mean that the operating day for the unit is necessarily beyond one year, but that the period that is being planned for is more than 1 year: it is specifically intended to avoid designating generation that is required to be run to remediate short term emergency reliability issues. These Facilities may be designated as "Reliability Must Run," and this designation is distinct from those generation Facilities designated as "must run" for market stabilization purposes. Because the use of the term "must run" creates some confusion in many areas, the drafting team chose to avoid using this term and instead drafted the requirement in more generic reliability language. In particular, the focus on preventing an Adverse Reliability Impact dictates that these units are designated as must run for reliability purposes beyond the local area. Those units designated as must run for voltage support in the local area would not generally be given this designation. In cases where there is no designated Planning Coordinator, the Transmission Planner is included as the Registered Entity that performs this designation.

If it is determined through System studies that a unit must run in order to preserve the reliability of the BES, such as due to a Category C3 contingency as defined in TPL-003, then BES Cyber Systems for that unit are categorized as medium impact.

The TPL standards require that, where the studies and plans indicate additional actions, that these studies and plans be communicated by the Planning Coordinator or Transmission Planner in writing to the Regional Entity/RRO. Actions necessary for the implementation of these plans by affected parties (generation owners/operators and Reliability Coordinators or other necessary party) are usually formalized in the form of an agreement and/or contract.

- Criterion 2.6 includes BES Cyber Systems for those Generation Facilities that have been identified as critical to the derivation of IROLs and their associated contingencies, as specified by FAC-014-2, **Establish and Communicate System Operating Limits**, R5.1.1 and R5.1.3.

IROLs may be based on dynamic System phenomena such as instability or voltage collapse. Derivation of these IROLs and their associated contingencies often considers the effect of generation inertia and AVR response.

- Criterion 2.9 categorizes BES Cyber Systems for Special Protection Systems and Remedial Action Schemes as medium impact. Special Protection Systems and Remedial Action Schemes may be implemented to prevent disturbances that would result in exceeding IROLs if they do not provide the function required at the time it is required or if it operates outside of the parameters it was designed for. Generation Owners and Generator Operators which own BES Cyber Systems for such Systems and schemes designate them as medium impact.
- Criterion 2.11 categorizes as medium impact BES Cyber Systems used by and at Control Centers that perform the functional obligations of the Generator Operator for an aggregate generation of 1500 MW or higher in a single interconnection, and that have not already been included in Part 1. .
- Criterion 2.13 categorizes as medium impact those BA Control Centers that “control” 1500 MW of generation or more in a single interconnection and that have not already been included in Part 1. The 1500 MW threshold is consistent with the impact level and rationale specified for Criterion 2.1.

### Transmission

*The SDT uses the phrases “Transmission Facilities at a single station or substation” and “Transmission stations or substations” to recognize the existence of both stations and substations. Many entities in industry consider a substation to be a location with physical borders (i.e. fence, wall, etc.) that contains at least an autotransformer. Locations also exist that do not contain autotransformers, and many entities in industry refer to those locations as stations (or switchyards). Therefore, the SDT chose to use both “station” and “substation” to refer to the locations where groups of Transmission Facilities exist.*

- Criteria 2.2, 2.4 through 2.10, and 2.12 in Attachment 1 are the criteria that are applicable to Transmission Owners and Operators. In many of the criteria, the impact threshold is defined as the capability of the failure or compromise of a System to result in exceeding one or more Interconnection Reliability Operating Limits (IROLs). Criterion 2.2 includes BES Cyber Systems for those Facilities in Transmission Systems that provide reactive resources to enhance and preserve the reliability of the BES. The nameplate value is used here because there is no NERC requirement to verify actual capability of these Facilities. The value of 1000 MVARs used in this criterion is a value deemed reasonable for the purpose of determining criticality.
- Criterion 2.4 includes BES Cyber Systems for any Transmission Facility at a substation operated at 500 kV or higher. While the drafting team felt that Facilities operated at 500 kV or higher did not require any further qualification for their role as components of the



backbone on the Interconnected BES, Facilities in the lower EHV range should have additional qualifying criteria for inclusion in the medium impact category.

It must be noted that if the collector bus for a generation plant (i.e. the plant is smaller in aggregate than the threshold set for generation in Criterion 2.1) is operated at 500kV, the collector bus should be considered a Generation Interconnection Facility, and not a Transmission Facility, according to the “Final Report from the Ad Hoc Group for Generation Requirements at the Transmission Interface.” This collector bus would not be a facility for a medium impact BES Cyber System because it does not significantly affect the 500kV Transmission grid; it only affects a plant which is below the generation threshold.

- Criterion 2.5 includes BES Cyber Systems for facilities at the lower end of BES Transmission with qualifications for inclusion if they are deemed highly likely to have significant impact on the BES. While the criterion has been specified as part of the rationale for requiring protection for significant impact on the BES, the drafting team included, in this criterion, additional qualifications that would ensure the required level of impact to the BES. The drafting team:
  - Excluded radial facilities that would only provide support for single generation facilities.
  - Specified interconnection to at least three transmission stations or substations to ensure that the level of impact would be appropriate.

The total aggregated weighted value of 3,000 was derived from weighted values related to three connected 345 kV lines and five connected 230 kV lines at a transmission station or substation. The total aggregated weighted value is used to account for the true impact to the BES, irrespective of line kV rating and mix of multiple kV rated lines.

Additionally, in NERC’s document “[Integrated Risk Assessment Approach – Refinement to Severity Risk Index](#)”, Attachment 1, the report used an average MVA line loading based on kV rating:

- 230 kV → 700 MVA
- 345 kV → 1,300 MVA
- 500 kV → 2,000 MVA
- 765 kV → 3,000 MVA

In the terms of applicable lines and connecting “other Transmission stations or substations” determinations, the following should be considered:

- For autotransformers in a station, Responsible Entities have flexibility in determining whether the groups of Facilities are considered a single substation or station location or multiple substations or stations. In most cases, Responsible Entities

would probably consider them as Facilities at a single substation or station unless geographically dispersed. In these cases of these transformers being within the “fence” of the substation or station, autotransformers may not count as separate connections to other stations. The use of common BES Cyber Systems may negate any rationale for any consideration otherwise. In the case of autotransformers that are geographically dispersed from a station location, the calculation would take into account the connections in and out of each station or substation location.

- Multiple-point (or multiple-tap) lines are considered to contribute a single weight value per line and affect the number of connections to other stations. Therefore, a single 230 kV multiple-point line between three Transmission stations or substations would contribute an aggregated weighted value of 700 and connect Transmission Facilities at a single station or substation to two other Transmission stations or substations.
- Multiple lines between two Transmission stations or substations are considered to contribute multiple weight values per line, but these multiple lines between the two stations only connect one station to one other station. Therefore, two 345 kV lines between two Transmission stations or substations would contribute an aggregated weighted value of 2600 and connect Transmission Facilities at a single station or substation to one other Transmission station or substation.

Criterion 2.5’s qualification for Transmission Facilities at a Transmission station or substation is based on 2 distinct conditions.

1. The first condition is that Transmission Facilities at a single station or substation where that station or substation connect, at voltage levels of 200 kV or higher to three (3) other stations or substations, to three other stations or substations. This qualification is meant to ensure that connections that operate at voltages of 500 kV or higher are included in the count of connections to other stations or substations as well.
2. The second qualification is that the aggregate value of all lines entering or leaving the station or substation must exceed 3000. This qualification does not include the consideration of lines operating at lower than 200 kV, or 500 kV or higher, the latter already qualifying as medium impact under criterion 2.4. : there is no value to be assigned to lines at voltages of less than 200 kV or 500 kV or higher in the table of values for the contribution to the aggregate value of 3000.

The Transmission Facilities at the station or substation must meet both qualifications to be considered as qualified under criterion 2.5.

- Criterion 2.6 include BES Cyber Systems for those Transmission Facilities that have been identified as critical to the derivation of IROLs and their associated contingencies, as

specified by FAC-014-2, **Establish and Communicate System Operating Limits**, R5.1.1 and R5.1.3.

- Criterion 2.7 is sourced from the NUC-001 NERC standard, Requirement R9.2.2, for the support of Nuclear Facilities. NUC-001 ensures that reliability of NPIR's are ensured through adequate coordination between the Nuclear Generator Owner/Operator and its Transmission provider "for the purpose of ensuring nuclear plant safe operation and shutdown." In particular, there are specific requirements to coordinate physical and cyber security protection of these interfaces.
- Criterion 2.8 designates as medium impact those BES Cyber Systems that impact Transmission Facilities necessary to directly support generation that meet the criteria in Criteria 2.1 (generation Facilities with output greater than 1500 MW) and 2.3 (generation Facilities generally designated as "must run" for wide area reliability in the planning horizon). The Responsible Entity can request a formal statement from the Generation owner as to the qualification of generation Facilities connected to their Transmission systems.
- Criterion 2.9 designates as medium impact those BES Cyber Systems for those Special Protection Systems (SPS), Remedial Action Schemes (RAS), or automated switching Systems installed to ensure BES operation within IROLs. The degradation, compromise or unavailability of these BES Cyber Systems would result in exceeding IROLs if they fail to operate as designed. By the definition of IROL, the loss or compromise of any of these have Wide Area impacts.
- Criterion 2.10 designates as medium impact those BES Cyber Systems for Systems or Elements that perform automatic Load shedding, without human operator initiation, of 300 MW or more. The SDT spent considerable time discussing the wording of Criterion 2.10, and chose the term "Each" to represent that the criterion applied to a discrete System or Facility. In the drafting of this criterion, the drafting team sought to include only those Systems that did not require human operator initiation, and targeted in particular those underfrequency load shedding (UFLS) Facilities and systems and undervoltage load shedding (UVLS) systems and Elements that would be subject to a regional Load shedding requirement to prevent Adverse Reliability Impact. These include automated UFLS systems or UVLS systems that are capable of Load shedding 300 MW or more. It should be noted that those qualifying systems which require a human operator to arm the system, but once armed, trigger automatically, are still to be considered as not requiring human operator initiation and should be designated as medium impact. The 300 MW threshold has been defined as the aggregate of the highest MW Load value, as defined by the applicable regional Load Shedding standards, for the preceding 12 months to account for seasonal fluctuations.

This particular threshold (300 MW) was provided in CIP, Version 1. The SDT believes that the threshold should be lower than the 1500MW generation requirement since it is specifically addressing UVLS and UFLS, which are last ditch efforts to save the Bulk Electric

System and hence requires a lower threshold. A review of UFLS tolerances defined within regional reliability standards for UFLS program requirements to date indicates that the historical value of 300 MW represents an adequate and reasonable threshold value for allowable UFLS operational tolerances.

In ERCOT, the Load acting as a Resource (“LaaR”) Demand Response Program is not part of the regional load shedding program, but an ancillary services market. In general, similar demand response programs that are not part of the NERC or regional reliability Load shedding programs, but are offered as components of an ancillary services market do not qualify under this criterion.

The language used in section 4 for UVLS and UFLS and in criterion 2.10 of Attachment 1 is designed to be consistent with requirements set in the PRC standards for UFLS and UVLS.

- Criterion 2.12 categorizes as medium impact those BES Cyber Systems used by and at Control Centers and associated data centers performing the functional obligations of a Transmission Operator and that have not already been categorized as high impact.
- Criterion 2.13 categorizes as Medium Impact those BA Control Centers that “control” 1500 MW of generation or more in a single Interconnection. The 1500 MW threshold is consistent with the impact level and rationale specified for Criterion 2.1.

### **Low Impact Rating (L)**

BES Cyber Systems not categorized in high impact or medium impact default to low impact. Note that low impact BES Cyber Systems do not require discrete identification.

### **Restoration Facilities**

- Several discussions on the CIP Version 5 standards suggest entities owning Blackstart Resources and Cranking Paths might elect to remove those services to avoid higher compliance costs. For example, one Reliability Coordinator reported a 25% reduction of Blackstart Resources as a result of the Version 1 language, and there could be more entities that make this choice under Version 5.

In response, the CIP Version 5 drafting team sought informal input from NERC’s Operating and Planning Committees. The committees indicate there has already been a reduction in Blackstart Resources because of increased CIP compliance costs, environmental rules, and other risks; continued inclusion within Version 5 at a category that would very significantly increase compliance costs can result in further reduction of a vulnerable pool.

The drafting team moved from the categorization of restoration assets such as Blackstart Resources and Cranking Paths as medium impact (as was the case in earlier drafts) to categorization of these assets as low impact as a result of these considerations. This will not relieve asset owners of all responsibilities, as would have been the case in CIP-002, Versions 1-4 (since only Cyber Assets with routable connectivity which are essential to

restoration assets are included in those versions). Under the low impact categorization, those assets will be protected in the areas of cyber security awareness, physical access control, and electronic access control, and they will have obligations regarding incident response. This represents a net gain to bulk power system reliability, however, since many of those assets do not meet criteria for inclusion under Versions 1-4.

Weighing the risks to overall BES reliability, the drafting team determined that this re-categorization represents the option that would be the least detrimental to restoration function and, thus, overall BES reliability. Removing Blackstart Resources and Cranking Paths from medium impact promotes overall reliability, as the likely alternative is fewer Blackstart Resources supporting timely restoration when needed.

BES Cyber Systems for generation resources that have been designated as Blackstart Resources in the Transmission Operator's restoration plan default to low impact. NERC Standard EOP-005-2 requires the Transmission Operator to have a Restoration Plan and to list its Blackstart Resources in its plan, as well as requirements to test these Resources. This criterion designates only those generation Blackstart Resources that have been designated as such in the Transmission Operator's restoration plan. The glossary term Blackstart Capability Plan has been retired.

Regarding concerns of communication to BES Asset Owners and Operators of their role in the Restoration Plan, Transmission Operators are required in NERC Standard EOP-005-2 to "provide the entities identified in its approved restoration plan with a description of any changes to their roles and specific tasks prior to the implementation date of the plan."

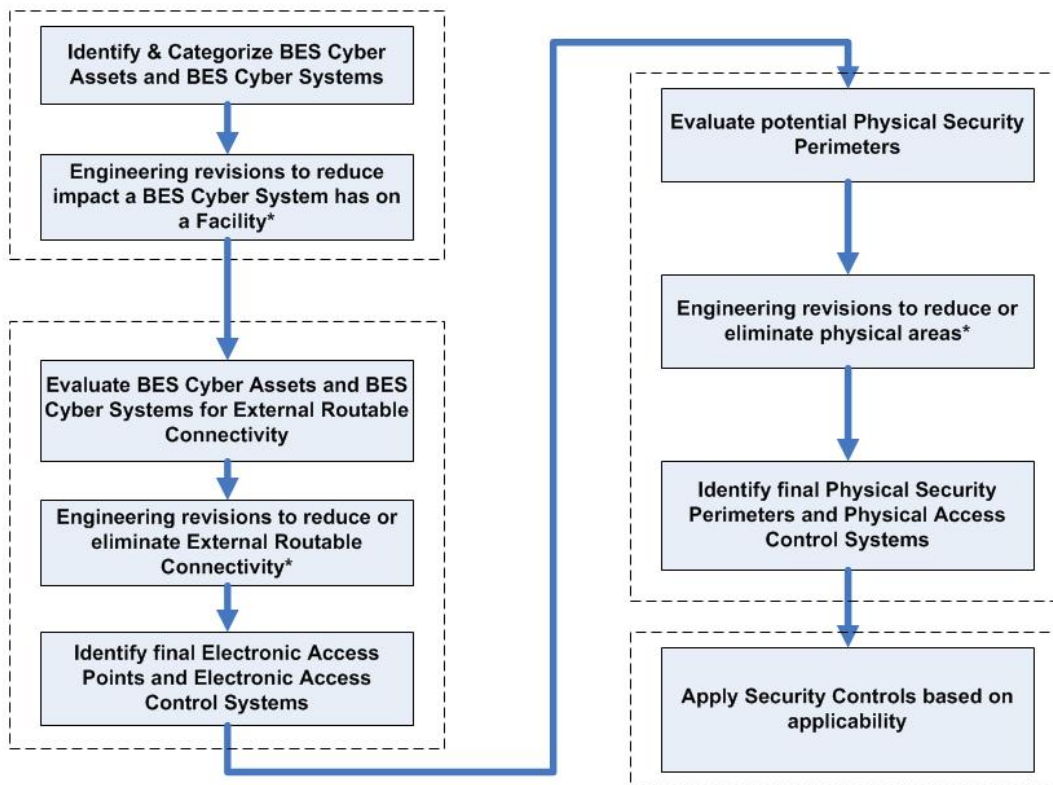
- BES Cyber Systems for Facilities and Elements comprising the Cranking Paths and meeting the initial switching requirements from the Blackstart Resource to the first Interconnection point of the generation unit(s) to be started, as identified in the Transmission Operator's restoration plan, default to the category of low impact: however, these systems are explicitly called out to ensure consideration for inclusion in the scope of the version 5 CIP standards. This requirement for inclusion in the scope is sourced from requirements in NERC standard EOP-005-2, which requires the Transmission Operator to include in its Restoration Plan the Cranking Paths and initial switching requirements from the Blackstart Resource and the unit(s) to be started.

Distribution Providers may note that they may have BES Cyber Systems that must be scoped in if they have Elements listed in the Transmission Operator's Restoration Plan that are components of the Cranking Path.

**Use Case: CIP Process Flow**

The following CIP use case process flow for a generator Operator/Owner was provided by a participant in the development of the Version 5 standards and is provided here as an example of a process used to identify and categorize BES Cyber Systems and BES Cyber Assets; review, develop, and implement strategies to mitigate overall risks; and apply applicable security controls.

**Overview (Generation Facility)**



\* - Engineering revisions will need to be reviewed for cost justification, operational safety requirements, support requirements, and technical limitations.

## **ATTACHMENT 3**

## A. Introduction

1. **Title:** Cyber Security — Personnel & Training

2. **Number:** CIP-004-5.1

3. **Purpose:** To minimize the risk against compromise that could lead to misoperation or instability in the BES from individuals accessing BES Cyber Systems by requiring an appropriate level of personnel risk assessment, training, and security awareness in support of protecting BES Cyber Systems.

### 4. **Applicability:**

**4.1. Functional Entities:** For the purpose of the requirements contained herein, the following list of functional entities will be collectively referred to as “Responsible Entities.” For requirements in this standard where a specific functional entity or subset of functional entities are the applicable entity or entities, the functional entity or entities are specified explicitly.

#### 4.1.1. **Balancing Authority**

**4.1.2. Distribution Provider** that owns one or more of the following Facilities, systems, and equipment for the protection or restoration of the BES:

**4.1.2.1.** Each underfrequency Load shedding (UFLS) or undervoltage Load shedding (UVLS) system that:

**4.1.2.1.1.** is part of a Load shedding program that is subject to one or more requirements in a NERC or Regional Reliability Standard; and

**4.1.2.1.2.** performs automatic Load shedding under a common control system owned by the Responsible Entity, without human operator initiation, of 300 MW or more.

**4.1.2.2.** Each Special Protection System or Remedial Action Scheme where the Special Protection System or Remedial Action Scheme is subject to one or more requirements in a NERC or Regional Reliability Standard.

**4.1.2.3.** Each Protection System (excluding UFLS and UVLS) that applies to Transmission where the Protection System is subject to one or more requirements in a NERC or Regional Reliability Standard.

**4.1.2.4.** Each Cranking Path and group of Elements meeting the initial switching requirements from a Blackstart Resource up to and including the first interconnection point of the starting station service of the next generation unit(s) to be started.

#### 4.1.3. **Generator Operator**

#### 4.1.4. **Generator Owner**

#### 4.1.5. **Interchange Coordinator or Interchange Authority**



**4.1.6. Reliability Coordinator**

**4.1.7. Transmission Operator**

**4.1.8. Transmission Owner**

**4.2. Facilities:** For the purpose of the requirements contained herein, the following Facilities, systems, and equipment owned by each Responsible Entity in 4.1 above are those to which these requirements are applicable. For requirements in this standard where a specific type of Facilities, system, or equipment or subset of Facilities, systems, and equipment are applicable, these are specified explicitly.

**4.2.1. Distribution Provider:** One or more of the following Facilities, systems and equipment owned by the Distribution Provider for the protection or restoration of the BES:

**4.2.1.1.** Each UFLS or UVLS System that:

**4.2.1.1.1.** is part of a Load shedding program that is subject to one or more requirements in a NERC or Regional Reliability Standard; and

**4.2.1.1.2.** performs automatic Load shedding under a common control system owned by the Responsible Entity, without human operator initiation, of 300 MW or more.

**4.2.1.2.** Each Special Protection System or Remedial Action Scheme where the Special Protection System or Remedial Action Scheme is subject to one or more requirements in a NERC or Regional Reliability Standard.

**4.2.1.3.** Each Protection System (excluding UFLS and UVLS) that applies to Transmission where the Protection System is subject to one or more requirements in a NERC or Regional Reliability Standard.

**4.2.1.4.** Each Cranking Path and group of Elements meeting the initial switching requirements from a Blackstart Resource up to and including the first interconnection point of the starting station service of the next generation unit(s) to be started.

**4.2.2. Responsible Entities listed in 4.1 other than Distribution Providers:**

All BES Facilities.

**4.2.3. Exemptions:** The following are exempt from Standard CIP-004-5.1:

**4.2.3.1.** Cyber Assets at Facilities regulated by the Canadian Nuclear Safety Commission.

**4.2.3.2.** Cyber Assets associated with communication networks and data communication links between discrete Electronic Security Perimeters.

**4.2.3.3.** The systems, structures, and components that are regulated by the Nuclear Regulatory Commission under a cyber security plan pursuant to 10 C.F.R. Section 73.54.

**4.2.3.4.** For Distribution Providers, the systems and equipment that are not included in section 4.2.1 above.

**4.2.3.5.** Responsible Entities that identify that they have no BES Cyber Systems categorized as high impact or medium impact according to the CIP-002-5 identification and categorization processes.

## 5. Effective Dates:

1. **24 Months Minimum** – CIP-004-5.1 shall become effective on the later of July 1, 2015, or the first calendar day of the ninth calendar quarter after the effective date of the order providing applicable regulatory approval.
2. In those jurisdictions where no regulatory approval is required, CIP-004-5.1 shall become effective on the first day of the ninth calendar quarter following Board of Trustees' approval, or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities.

## 6. Background:

Standard CIP-004-5.1 exists as part of a suite of CIP Standards related to cyber security. CIP-002-5 requires the initial identification and categorization of BES Cyber Systems. CIP-003-5, CIP-004-5, CIP-005-5, CIP-006-5, CIP-007-5, CIP-008-5, CIP-009-5, CIP-010-1 and CIP-011-1 require a minimum level of organizational, operational and procedural controls to mitigate risk to BES Cyber Systems. This suite of CIP Standards is referred to as the *Version 5 CIP Cyber Security Standards*.

Most requirements open with, "*Each Responsible Entity shall implement one or more documented [processes, plan, etc] that include the applicable items in [Table Reference].*" The referenced table requires the applicable items in the procedures for the requirement's common subject matter.

The SDT has incorporated within this standard a recognition that certain requirements should not focus on individual instances of failure as a sole basis for violating the standard. In particular, the SDT has incorporated an approach to empower and enable the industry to identify, assess, and correct deficiencies in the implementation of certain requirements. The intent is to change the basis of a violation in those requirements so that they are not focused on *whether* there is a deficiency, but on identifying, assessing, and correcting deficiencies. It is presented in those requirements by modifying "implement" as follows:

Each Responsible Entity shall implement, **in a manner that identifies, assesses, and corrects deficiencies, . . .**

The term *documented processes* refers to a set of required instructions specific to the Responsible Entity and to achieve a specific outcome. This term does not imply any particular naming or approval structure beyond what is stated in the requirements. An entity should include as much as it believes necessary in their documented processes, but they must address the applicable requirements in the table. The documented processes themselves are not required to include the ". . . identifies, assesses, and corrects deficiencies, . . ." elements described in the preceding paragraph, as those aspects are related to the manner of

implementation of the documented processes and could be accomplished through other controls or compliance management activities.

The terms *program* and *plan* are sometimes used in place of *documented processes* where it makes sense and is commonly understood. For example, documented processes describing a response are typically referred to as *plans* (i.e., incident response plans and recovery plans). Likewise, a security plan can describe an approach involving multiple procedures to address a broad subject matter.

Similarly, the term *program* may refer to the organization’s overall implementation of its policies, plans and procedures involving a subject matter. Examples in the standards include the personnel risk assessment program and the personnel training program. The full implementation of the CIP Cyber Security Standards could also be referred to as a program. However, the terms *program* and *plan* do not imply any additional requirements beyond what is stated in the standards.

Responsible Entities can implement common controls that meet requirements for multiple high and medium impact BES Cyber Systems. For example, a single training program could meet the requirements for training personnel across multiple BES Cyber Systems.

Measures for the initial requirement are simply the documented processes themselves. Measures in the table rows provide examples of evidence to show documentation and implementation of applicable items in the documented processes. These measures serve to provide guidance to entities in acceptable records of compliance and should not be viewed as an all-inclusive list.

Throughout the standards, unless otherwise stated, bulleted items in the requirements and measures are items that are linked with an “or,” and numbered items are items that are linked with an “and.”

Many references in the Applicability section use a threshold of 300 MW for UFLS and UVLS. This particular threshold of 300 MW for UVLS and UFLS was provided in Version 1 of the CIP Cyber Security Standards. The threshold remains at 300 MW since it is specifically addressing UVLS and UFLS, which are last ditch efforts to save the Bulk Electric System. A review of UFLS tolerances defined within regional reliability standards for UFLS program requirements to date indicates that the historical value of 300 MW represents an adequate and reasonable threshold value for allowable UFLS operational tolerances.

#### **“Applicable Systems” Columns in Tables:**

Each table has an “Applicable Systems” column to further define the scope of systems to which a specific requirement row applies. The CSO706 SDT adapted this concept from the National Institute of Standards and Technology (“NIST”) Risk Management Framework as a way of applying requirements more appropriately based on impact and connectivity characteristics. The following conventions are used in the “Applicable Systems” column as described.

- **High Impact BES Cyber Systems** – Applies to BES Cyber Systems categorized as high impact according to the CIP-002-5 identification and categorization processes.

- **Medium Impact BES Cyber Systems** – Applies to BES Cyber Systems categorized as medium impact according to the CIP-002-5 identification and categorization processes.
- **Medium Impact BES Cyber Systems with External Routable Connectivity** – Only applies to medium impact BES Cyber Systems with External Routable Connectivity. This also excludes Cyber Assets in the BES Cyber System that cannot be directly accessed through External Routable Connectivity.
- **Electronic Access Control or Monitoring Systems (EACMS)** – Applies to each Electronic Access Control or Monitoring System associated with a referenced high impact BES Cyber System or medium impact BES Cyber System. Examples may include, but are not limited to, firewalls, authentication servers, and log monitoring and alerting systems.
- **Physical Access Control Systems (PACS)** – Applies to each Physical Access Control System associated with a referenced high impact BES Cyber System or medium impact BES Cyber System with External Routable Connectivity.

**B. Requirements and Measures**

- R1.** Each Responsible Entity shall implement one or more documented processes that collectively include each of the applicable requirement parts in *CIP-004-5.1 Table R1 – Security Awareness Program*. [Violation Risk Factor: Lower] [Time Horizon: Operations Planning]
- M1.** Evidence must include each of the applicable documented processes that collectively include each of the applicable requirement parts in *CIP-004-5.1 Table R1 – Security Awareness Program* and additional evidence to demonstrate implementation as described in the Measures column of the table.

CIP-004-5.1 Table R1 – Security Awareness Program			
Part	Applicable Systems	Requirements	Measures
1.1	High Impact BES Cyber Systems Medium Impact BES Cyber Systems	Security awareness that, at least once each calendar quarter, reinforces cyber security practices (which may include associated physical security practices) for the Responsible Entity’s personnel who have authorized electronic or authorized unescorted physical access to BES Cyber Systems.	An example of evidence may include, but is not limited to, documentation that the quarterly reinforcement has been provided. Examples of evidence of reinforcement may include, but are not limited to, dated copies of information used to reinforce security awareness, as well as evidence of distribution, such as: <ul style="list-style-type: none"> <li>• direct communications (for example, e-mails, memos, computer-based training); or</li> <li>• indirect communications (for example, posters, intranet, or brochures); or</li> <li>• management support and reinforcement (for example, presentations or meetings).</li> </ul>

- R2.** Each Responsible Entity shall implement, in a manner that identifies, assesses, and corrects deficiencies, a cyber security training program(s) appropriate to individual roles, functions, or responsibilities that collectively includes each of the applicable requirement parts in *CIP-004-5.1 Table R2 – Cyber Security Training Program*. [*Violation Risk Factor: Lower*]  
[*Time Horizon: Operations Planning*]
- M2.** Evidence must include the training program that includes each of the applicable requirement parts in *CIP-004-5.1 Table R2 – Cyber Security Training Program* and additional evidence to demonstrate implementation of the program(s).

CIP-004-5.1 Table R2 – Cyber Security Training Program			
Part	Applicable Systems	Requirements	Measures
2.1	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Training content on:</p> <ol style="list-style-type: none"> <li>2.1.1. Cyber security policies;</li> <li>2.1.2. Physical access controls;</li> <li>2.1.3. Electronic access controls;</li> <li>2.1.4. The visitor control program;</li> <li>2.1.5. Handling of BES Cyber System Information and its storage;</li> <li>2.1.6. Identification of a Cyber Security Incident and initial notifications in accordance with the entity’s incident response plan;</li> <li>2.1.7. Recovery plans for BES Cyber Systems;</li> <li>2.1.8. Response to Cyber Security Incidents; and</li> <li>2.1.9. Cyber security risks associated with a BES Cyber System’s electronic interconnectivity and interoperability with other Cyber Assets.</li> </ol>	<p>Examples of evidence may include, but are not limited to, training material such as power point presentations, instructor notes, student notes, handouts, or other training materials.</p>

CIP-004-5.1 Table R2 – Cyber Security Training Program			
Part	Applicable Systems	Requirements	Measures
2.2	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Require completion of the training specified in Part 2.1 prior to granting authorized electronic access and authorized unescorted physical access to applicable Cyber Assets, except during CIP Exceptional Circumstances.</p>	<p>Examples of evidence may include, but are not limited to, training records and documentation of when CIP Exceptional Circumstances were invoked.</p>
2.3	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Require completion of the training specified in Part 2.1 at least once every 15 calendar months.</p>	<p>Examples of evidence may include, but are not limited to, dated individual training records.</p>

**R3.** Each Responsible Entity shall implement, in a manner that identifies, assesses, and corrects deficiencies, one or more documented personnel risk assessment programs to attain and retain authorized electronic or authorized unescorted physical access to BES Cyber Systems that collectively include each of the applicable requirement parts in *CIP-004-5.1 Table R3 – Personnel Risk Assessment Program*. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning].



**M3.** Evidence must include the documented personnel risk assessment programs that collectively include each of the applicable requirement parts in *CIP-004-5.1 Table R3 – Personnel Risk Assessment Program* and additional evidence to demonstrate implementation of the program(s).

CIP-004-5.1 Table R3 – Personnel Risk Assessment Program			
Part	Applicable Systems	Requirements	Measures
3.1	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Process to confirm identity.</p>	<p>An example of evidence may include, but is not limited to, documentation of the Responsible Entity’s process to confirm identity.</p>

CIP-004-5.1 Table R3 – Personnel Risk Assessment Program			
Part	Applicable Systems	Requirements	Measures
3.2	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Process to perform a seven year criminal history records check as part of each personnel risk assessment that includes:</p> <ol style="list-style-type: none"> <li>3.2.1. current residence, regardless of duration; and</li> <li>3.2.2. other locations where, during the seven years immediately prior to the date of the criminal history records check, the subject has resided for six consecutive months or more.</li> </ol> <p>If it is not possible to perform a full seven year criminal history records check, conduct as much of the seven year criminal history records check as possible and document the reason the full seven year criminal history records check could not be performed.</p>	<p>An example of evidence may include, but is not limited to, documentation of the Responsible Entity’s process to perform a seven year criminal history records check.</p>

CIP-004-5.1 Table R3 – Personnel Risk Assessment Program			
Part	Applicable Systems	Requirements	Measures
3.3	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Criteria or process to evaluate criminal history records checks for authorizing access.</p>	<p>An example of evidence may include, but is not limited to, documentation of the Responsible Entity’s process to evaluate criminal history records checks.</p>
3.4	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Criteria or process for verifying that personnel risk assessments performed for contractors or service vendors are conducted according to Parts 3.1 through 3.3.</p>	<p>An example of evidence may include, but is not limited to, documentation of the Responsible Entity’s criteria or process for verifying contractors or service vendors personnel risk assessments.</p>

CIP-004-5.1 Table R3 – Personnel Risk Assessment Program			
Part	Applicable Systems	Requirements	Measures
3.5	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Process to ensure that individuals with authorized electronic or authorized unescorted physical access have had a personnel risk assessment completed according to Parts 3.1 to 3.4 within the last seven years.</p>	<p>An example of evidence may include, but is not limited to, documentation of the Responsible Entity’s process for ensuring that individuals with authorized electronic or authorized unescorted physical access have had a personnel risk assessment completed within the last seven years.</p>

- R4.** Each Responsible Entity shall implement, in a manner that identifies, assesses, and corrects deficiencies, one or more documented access management programs that collectively include each of the applicable requirement parts in *CIP-004-5.1 Table R4 – Access Management Program*. [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning and Same Day Operations*].
- M4.** Evidence must include the documented processes that collectively include each of the applicable requirement parts in *CIP-004-5.1 Table R4 – Access Management Program* and additional evidence to demonstrate that the access management program was implemented as described in the Measures column of the table.

CIP-004-5.1 Table R4 – Access Management Program			
Part	Applicable Systems	Requirements	Measures
4.1	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Process to authorize based on need, as determined by the Responsible Entity, except for CIP Exceptional Circumstances:</p> <ol style="list-style-type: none"> <li>4.1.1. Electronic access;</li> <li>4.1.2. Unescorted physical access into a Physical Security Perimeter; and</li> <li>4.1.3. Access to designated storage locations, whether physical or electronic, for BES Cyber System Information.</li> </ol>	<p>An example of evidence may include, but is not limited to, dated documentation of the process to authorize electronic access, unescorted physical access in a Physical Security Perimeter, and access to designated storage locations, whether physical or electronic, for BES Cyber System Information.</p>

CIP-004-5.1 Table R4 – Access Management Program			
Part	Applicable Systems	Requirements	Measures
4.2	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Verify at least once each calendar quarter that individuals with active electronic access or unescorted physical access have authorization records.</p>	<p>Examples of evidence may include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Dated documentation of the verification between the system generated list of individuals who have been authorized for access (i.e., workflow database) and a system generated list of personnel who have access (i.e., user account listing), or</li> <li>• Dated documentation of the verification between a list of individuals who have been authorized for access (i.e., authorization forms) and a list of individuals provisioned for access (i.e., provisioning forms or shared account listing).</li> </ul>

CIP-004-5.1 Table R4 – Access Management Program			
Part	Applicable Systems	Requirements	Measures
4.3	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>For electronic access, verify at least once every 15 calendar months that all user accounts, user account groups, or user role categories, and their specific, associated privileges are correct and are those that the Responsible Entity determines are necessary.</p>	<p>An example of evidence may include, but is not limited to, documentation of the review that includes all of the following:</p> <ol style="list-style-type: none"> <li>1. A dated listing of all accounts/account groups or roles within the system;</li> <li>2. A summary description of privileges associated with each group or role;</li> <li>3. Accounts assigned to the group or role; and</li> <li>4. Dated evidence showing verification of the privileges for the group are authorized and appropriate to the work function performed by people assigned to each account.</li> </ol>

CIP-004-5.1 Table R4 – Access Management Program			
Part	Applicable Systems	Requirements	Measures
4.4	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Verify at least once every 15 calendar months that access to the designated storage locations for BES Cyber System Information, whether physical or electronic, are correct and are those that the Responsible Entity determines are necessary for performing assigned work functions.</p>	<p>An example of evidence may include, but is not limited to, the documentation of the review that includes all of the following:</p> <ol style="list-style-type: none"> <li>1. A dated listing of authorizations for BES Cyber System information;</li> <li>2. Any privileges associated with the authorizations; and</li> <li>3. Dated evidence showing a verification of the authorizations and any privileges were confirmed correct and the minimum necessary for performing assigned work functions.</li> </ol>



- R5.** Each Responsible Entity shall implement, in a manner that identifies, assesses, and corrects deficiencies, one or more documented access revocation programs that collectively include each of the applicable requirement parts in *CIP-004-5.1 Table R5 – Access Revocation*. [Violation Risk Factor: Medium] [Time Horizon: Same Day Operations and Operations Planning].
- M5.** Evidence must include each of the applicable documented programs that collectively include each of the applicable requirement parts in *CIP-004-5.1 Table R5 – Access Revocation* and additional evidence to demonstrate implementation as described in the Measures column of the table.

CIP-004-5.1 Table R5 – Access Revocation			
Part	Applicable Systems	Requirements	Measures
5.1	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>A process to initiate removal of an individual’s ability for unescorted physical access and Interactive Remote Access upon a termination action, and complete the removals within 24 hours of the termination action (Removal of the ability for access may be different than deletion, disabling, revocation, or removal of all access rights).</p>	<p>An example of evidence may include, but is not limited to, documentation of all of the following:</p> <ol style="list-style-type: none"> <li>1. Dated workflow or sign-off form verifying access removal associated with the termination action; and</li> <li>2. Logs or other demonstration showing such persons no longer have access.</li> </ol>

CIP-004-5.1 Table R5 – Access Revocation			
Part	Applicable Systems	Requirements	Measures
5.2	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>For reassignments or transfers, revoke the individual’s authorized electronic access to individual accounts and authorized unescorted physical access that the Responsible Entity determines are not necessary by the end of the next calendar day following the date that the Responsible Entity determines that the individual no longer requires retention of that access.</p>	<p>An example of evidence may include, but is not limited to, documentation of all of the following:</p> <ol style="list-style-type: none"> <li>1. Dated workflow or sign-off form showing a review of logical and physical access; and</li> <li>2. Logs or other demonstration showing such persons no longer have access that the Responsible Entity determines is not necessary.</li> </ol>

CIP-004-5.1 Table R5 – Access Revocation			
Part	Applicable Systems	Requirements	Measures
5.3	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>For termination actions, revoke the individual’s access to the designated storage locations for BES Cyber System Information, whether physical or electronic (unless already revoked according to Requirement R5.1), by the end of the next calendar day following the effective date of the termination action.</p>	<p>An example of evidence may include, but is not limited to, workflow or sign-off form verifying access removal to designated physical areas or cyber systems containing BES Cyber System Information associated with the terminations and dated within the next calendar day of the termination action.</p>

CIP-004-5.1 Table R5 – Access Revocation			
Part	Applicable Systems	Requirements	Measures
5.4	High Impact BES Cyber Systems and their associated: <ul style="list-style-type: none"> <li>EACMS</li> </ul>	For termination actions, revoke the individual’s non-shared user accounts (unless already revoked according to Parts 5.1 or 5.3) within 30 calendar days of the effective date of the termination action.	An example of evidence may include, but is not limited to, workflow or sign-off form showing access removal for any individual BES Cyber Assets and software applications as determined necessary to completing the revocation of access and dated within thirty calendar days of the termination actions.

CIP-004-5.1 Table R5 – Access Revocation			
Part	Applicable Systems	Requirements	Measures
5.5	<p>High Impact BES Cyber Systems and their associated:</p> <ul style="list-style-type: none"> <li>EACMS</li> </ul>	<p>For termination actions, change passwords for shared account(s) known to the user within 30 calendar days of the termination action. For reassignments or transfers, change passwords for shared account(s) known to the user within 30 calendar days following the date that the Responsible Entity determines that the individual no longer requires retention of that access.</p> <p>If the Responsible Entity determines and documents that extenuating operating circumstances require a longer time period, change the password(s) within 10 calendar days following the end of the operating circumstances.</p>	<p>Examples of evidence may include, but are not limited to:</p> <ul style="list-style-type: none"> <li>Workflow or sign-off form showing password reset within 30 calendar days of the termination;</li> <li>Workflow or sign-off form showing password reset within 30 calendar days of the reassignments or transfers; or</li> <li>Documentation of the extenuating operating circumstance and workflow or sign-off form showing password reset within 10 calendar days following the end of the operating circumstance.</li> </ul>

## C. Compliance

### 1. Compliance Monitoring Process:

#### 1.1. Compliance Enforcement Authority:

The Regional Entity shall serve as the Compliance Enforcement Authority (“CEA”) unless the applicable entity is owned, operated, or controlled by the Regional Entity. In such cases the ERO or a Regional Entity approved by FERC or other applicable governmental authority shall serve as the CEA.

#### 1.2. Evidence Retention:

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the CEA may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Responsible Entity shall keep data or evidence to show compliance as identified below unless directed by its CEA to retain specific evidence for a longer period of time as part of an investigation:

- Each Responsible Entity shall retain evidence of each requirement in this standard for three calendar years.
- If a Responsible Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time specified above, whichever is longer.
- The CEA shall keep the last audit records and all requested and submitted subsequent audit records.

#### 1.3. Compliance Monitoring and Assessment Processes:

- Compliance Audit
- Self-Certification
- Spot Checking
- Compliance Investigation
- Self-Reporting
- Complaint

#### 1.4. Additional Compliance Information:

- None

2. Table of Compliance Elements

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Operations Planning	Lower	The Responsible Entity did not reinforce cyber security practices during a calendar quarter but did so less than 10 calendar days after the start of a subsequent calendar quarter. (1.1)	The Responsible Entity did not reinforce cyber security practices during a calendar quarter but did so between 10 and 30 calendar days after the start of a subsequent calendar quarter. (1.1)	The Responsible Entity did not reinforce cyber security practices during a calendar quarter but did so within the subsequent quarter but beyond 30 calendar days after the start of that calendar quarter. (1.1)	The Responsible Entity did not document or implement any security awareness process(es) to reinforce cyber security practices. (R1)  OR The Responsible Entity did not reinforce cyber security practices and associated physical security practices for at least two consecutive calendar quarters. (1.1)
R2	Operations Planning	Lower	The Responsible Entity implemented a cyber security training program but failed to include one of the training	The Responsible Entity implemented a cyber security training program but failed to include two of the training content topics in Requirement Parts 2.1.1 through 2.1.9, and did not identify, assess and correct the	The Responsible Entity implemented a cyber security training program but failed to include three of the training content topics in Requirement Parts 2.1.1 through 2.1.9, and did not identify, assess and correct the	The Responsible Entity did not implement a cyber security training program appropriate to individual roles, functions, or responsibilities. (R2)  OR The Responsible Entity

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			<p>content topics in Requirement Parts 2.1.1 through 2.1.9, and did not identify, assess and correct the deficiencies. (2.1)</p> <p>OR</p> <p>The Responsible Entity implemented a cyber security training program but failed to train one individual (with the exception of CIP Exceptional Circumstances) prior to their being granted authorized electronic and authorized</p>	<p>deficiencies. (2.1)</p> <p>OR</p> <p>The Responsible Entity implemented a cyber security training program but failed to train two individuals (with the exception of CIP Exceptional Circumstances) prior to their being granted authorized electronic and authorized unescorted physical access, and did not identify, assess and correct the deficiencies. (2.2)</p> <p>OR</p> <p>The Responsible Entity implemented a cyber security training program but failed to train two individuals with authorized electronic or authorized unescorted physical</p>	<p>deficiencies. (2.1)</p> <p>OR</p> <p>The Responsible Entity implemented a cyber security training program but failed to train three individuals (with the exception of CIP Exceptional Circumstances) prior to their being granted authorized electronic and authorized unescorted physical access, and did not identify, assess and correct the deficiencies. (2.2)</p> <p>OR</p> <p>The Responsible Entity implemented a cyber security training program but failed to train three individuals with authorized electronic or authorized unescorted physical</p>	<p>implemented a cyber security training program but failed to include four or more of the training content topics in Requirement Parts 2.1.1 through 2.1.9, and did not identify, assess and correct the deficiencies. (2.1)</p> <p>OR</p> <p>The Responsible Entity implemented a cyber security training program but failed to train four or more individuals (with the exception of CIP Exceptional Circumstances) prior to their being granted authorized electronic and authorized unescorted physical access, and did not identify, assess and correct the deficiencies.</p>



R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			<p>unescorted physical access, and did not identify, assess and correct the deficiencies. (2.2)</p> <p>OR</p> <p>The Responsible Entity implemented a cyber security training program but failed to train one individual with authorized electronic or authorized unescorted physical access within 15 calendar months of the previous training completion</p>	<p>access within 15 calendar months of the previous training completion date, and did not identify, assess and correct the deficiencies. (2.3)</p>	<p>access within 15 calendar months of the previous training completion date, and did not identify, assess and correct the deficiencies. (2.3)</p>	<p>(2.2)</p> <p>OR</p> <p>The Responsible Entity implemented a cyber security training program but failed to train four or more individuals with authorized electronic or authorized unescorted physical access within 15 calendar months of the previous training completion date, and did not identify, assess and correct the deficiencies. (2.3)</p>

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			date, and did not identify, assess and correct the deficiencies. (2.3)			
<b>R3</b>	<b>Operations Planning</b>	<b>Medium</b>	<p>The Responsible Entity has a program for conducting Personnel Risk Assessments (PRAs) for individuals, including contractors and service vendors, but did not conduct the PRA as a condition of granting authorized electronic or authorized unescorted physical access</p>	<p>The Responsible Entity has a program for conducting Personnel Risk Assessments (PRAs) for individuals, including contractors and service vendors, but did not conduct the PRA as a condition of granting authorized electronic or authorized unescorted physical access for two individuals, and did not identify, assess, and correct the deficiencies. (R3)</p> <p>OR</p> <p>The Responsible Entity did conduct Personnel Risk Assessments (PRAs) for individuals, including</p>	<p>The Responsible Entity has a program for conducting Personnel Risk Assessments (PRAs) for individuals, including contractors and service vendors, but did not conduct the PRA as a condition of granting authorized electronic or authorized unescorted physical access for three individuals, and did not identify, assess, and correct the deficiencies. (R3)</p> <p>OR</p> <p>The Responsible Entity did conduct Personnel Risk Assessments (PRAs) for individuals, including</p>	<p>The Responsible Entity did not have all of the required elements as described by 3.1 through 3.4 included within documented program(s) for implementing Personnel Risk Assessments (PRAs), for individuals, including contractors and service vendors, for obtaining and retaining authorized cyber or authorized unescorted physical access. (R3)</p> <p>OR</p> <p>The Responsible Entity has a program for conducting Personnel Risk Assessments (PRAs)</p>

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			for one individual, and did not identify, assess, and correct the deficiencies. (R3) OR The Responsible Entity did conduct Personnel Risk Assessments (PRAs) for individuals, including contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not confirm identity for one	contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not confirm identity for two individuals, and did not identify, assess, and correct the deficiencies. (3.1 & 3.4) OR The Responsible Entity has a process to perform seven-year criminal history record checks for individuals, including contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not include the required checks described in 3.2.1 and 3.2.2 for two individuals, and did not identify, assess, and correct the deficiencies.	contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not confirm identity for three individuals, and did not identify, assess, and correct the deficiencies. (3.1 & 3.4) OR The Responsible Entity has a process to perform seven-year criminal history record checks for individuals, including contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not include the required checks described in 3.2.1 and 3.2.2 for three individuals, and did not identify, assess, and correct the deficiencies.	for individuals, including contractors and service vendors, but did not conduct the PRA as a condition of granting authorized electronic or authorized unescorted physical access for four or more individuals, and did not identify, assess, and correct the deficiencies. (R3) OR The Responsible Entity did conduct Personnel Risk Assessments (PRAs) for individuals, including contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not confirm identity for four or more individuals, and did not identify, assess, and correct the deficiencies. (3.1 & 3.4)

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			individual, and did not identify, assess, and correct the deficiencies. (3.1 & 3.4) OR The Responsible Entity has a process to perform seven-year criminal history record checks for individuals, including contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not include the required	(3.2 & 3.4) OR The Responsible Entity did conduct Personnel Risk Assessments (PRAs) for individuals, including contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not evaluate criminal history records check for access authorization for two individuals, and did not identify, assess, and correct the deficiencies. (3.3 & 3.4) OR The Responsible Entity did not conduct Personnel Risk Assessments (PRAs) for two individuals with authorized electronic or authorized unescorted physical access within 7	(3.2 & 3.4) OR The Responsible Entity did conduct Personnel Risk Assessments (PRAs) for individuals, including contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not evaluate criminal history records check for access authorization for three individuals, and did not identify, assess, and correct the deficiencies. (3.3 & 3.4) OR The Responsible Entity did not conduct Personnel Risk Assessments (PRAs) for three individuals with authorized electronic or authorized unescorted physical access within 7	OR The Responsible Entity has a process to perform seven-year criminal history record checks for individuals, including contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not include the required checks described in 3.2.1 and 3.2.2 for four or more individuals, and did not identify, assess, and correct the deficiencies. (3.2 & 3.4) OR The Responsible Entity did conduct Personnel Risk Assessments (PRAs) for individuals, including contractors and service vendors, with authorized electronic or

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			<p>checks described in 3.2.1 and 3.2.2 for one individual, and did not identify, assess, and correct the deficiencies. (3.2 &amp; 3.4)</p> <p>OR</p> <p>The Responsible Entity did conduct Personnel Risk Assessments (PRAs) for individuals, including contractors and service vendors, with authorized electronic or authorized unescorted physical access</p>	<p>calendar years of the previous PRA completion date, and did not identify, assess, and correct the deficiencies. (3.5)</p>	<p>calendar years of the previous PRA completion date, and did not identify, assess, and correct the deficiencies. (3.5)</p>	<p>authorized unescorted physical access but did not evaluate criminal history records check for access authorization for four or more individuals, and did not identify, assess, and correct the deficiencies. (3.3 &amp; 3.4)</p> <p>OR</p> <p>The Responsible Entity did not conduct Personnel Risk Assessments (PRAs) for four or more individuals with authorized electronic or authorized unescorted physical access within 7 calendar years of the previous PRA completion date and has identified deficiencies, and did not identify, assess, and correct the deficiencies. (3.5)</p>

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			but did not evaluate criminal history records check for access authorization for one individual, and did not identify, assess, and correct the deficiencies. (3.3 & 3.4) OR The Responsible Entity did not conduct Personnel Risk Assessments (PRAs) for one individual with authorized electronic or authorized unescorted physical access within 7			

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			calendar years of the previous PRA completion date, and did not identify, assess, and correct the deficiencies. (3.5)			
<b>R4</b>	<b>Operations Planning and Same Day Operations</b>	<b>Lower</b>	The Responsible Entity did not verify that individuals with active electronic or active unescorted physical access have authorization records during a calendar quarter but did so less than 10 calendar days after the start	The Responsible Entity did not verify that individuals with active electronic or active unescorted physical access have authorization records during a calendar quarter but did so between 10 and 20 calendar days after the start of a subsequent calendar quarter, and did not identify, assess, and correct the deficiencies. (4.2)  OR	The Responsible Entity did not verify that individuals with active electronic or active unescorted physical access have authorization records during a calendar quarter but did so between 20 and 30 calendar days after the start of a subsequent calendar quarter, and did not identify, assess, and correct the deficiencies. (4.2)  OR	The Responsible Entity did not implement any documented program(s) for access management. (R4)  OR The Responsible Entity has implemented one or more documented program(s) for access management that includes a process to authorize electronic access, unescorted physical access, or access to the designated storage locations where

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			<p>of a subsequent calendar quarter, and did not identify, assess and correct the deficiencies. (4.2)</p> <p>OR</p> <p>The Responsible Entity has implemented processes to verify that user accounts, user account groups, or user role categories, and their specific, associated privileges are correct and necessary within 15</p>	<p>The Responsible Entity has implemented processes to verify that user accounts, user account groups, or user role categories, and their specific, associated privileges are correct and necessary within 15 calendar months of the previous verification but for two BES Cyber Systems, privileges were incorrect or unnecessary, and did not identify, assess, and correct the deficiencies. (4.3)</p> <p>OR</p> <p>The Responsible Entity has implemented processes to verify that access to the designated storage locations for BES Cyber System Information is correct and necessary within 15</p>	<p>The Responsible Entity has implemented processes to verify that user accounts, user account groups, or user role categories, and their specific, associated privileges are correct and necessary within 15 calendar months of the previous verification but for three BES Cyber Systems, privileges were incorrect or unnecessary, and did not identify, assess, and correct the deficiencies. (4.3)</p> <p>OR</p> <p>The Responsible Entity has implemented processes to verify that access to the designated storage locations for BES Cyber System Information is correct and necessary within 15</p>	<p>BES Cyber System Information is located, and did not identify, assess, and correct the deficiencies. (4.1)</p> <p>OR</p> <p>The Responsible Entity did not verify that individuals with active electronic or active unescorted physical access have authorization records for at least two consecutive calendar quarters, and did not identify, assess, and correct the deficiencies. (4.2)</p> <p>OR</p> <p>The Responsible Entity has implemented processes to verify that user accounts, user account groups, or user role categories, and their specific, associated</p>



R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			<p>calendar months of the previous verification but for one BES Cyber System, privileges were incorrect or unnecessary, and did not identify, assess and correct the deficiencies. (4.3)</p> <p>OR</p> <p>The Responsible Entity has implemented processes to verify that access to the designated storage locations for BES Cyber System Information is</p>	<p>calendar months of the previous verification but for two BES Cyber System Information storage locations, privileges were incorrect or unnecessary, and did not identify, assess, and correct the deficiencies. (4.4)</p>	<p>calendar months of the previous verification but for three BES Cyber System Information storage locations, privileges were incorrect or unnecessary, and did not identify, assess, and correct the deficiencies. (4.4)</p>	<p>privileges are correct and necessary within 15 calendar months of the previous verification but for four or more BES Cyber Systems, privileges were incorrect or unnecessary, and did not identify, assess, and correct the deficiencies. (4.3)</p> <p>OR</p> <p>The Responsible Entity has implemented processes to verify that access to the designated storage locations for BES Cyber System Information is correct and necessary within 15 calendar months of the previous verification but for four or more BES Cyber System Information storage locations, privileges</p>

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			correct and necessary within 15 calendar months of the previous verification but for one BES Cyber System Information storage location, privileges were incorrect or unnecessary, and did not identify, assess and correct the deficiencies. (4.4)			were incorrect or unnecessary, and did not identify, assess, and correct the deficiencies. (4.4)
<b>R5</b>	<b>Same Day Operations and Operations Planning</b>	<b>Medium</b>	The Responsible Entity has implemented one or more process(es) to revoke the individual's	The Responsible Entity has implemented one or more process(es) to remove the ability for unescorted physical access and Interactive Remote Access upon a termination action or	The Responsible Entity has implemented one or more process(es) to remove the ability for unescorted physical access and Interactive Remote Access upon a termination action or	The Responsible Entity has not implemented any documented program(s) for access revocation for electronic access, unescorted physical access, or BES Cyber System

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			<p>access to the designated storage locations for BES Cyber System Information but, for one individual, did not do so by the end of the next calendar day following the effective date and time of the termination action, and did not identify, assess, and correct the deficiencies. (5.3)</p> <p>OR</p> <p>The Responsible Entity has implemented</p>	<p>complete the removal within 24 hours of the termination action but did not initiate those removals for one individual, and did not identify, assess, and correct the deficiencies. (5.1)</p> <p>OR</p> <p>The Responsible Entity has implemented one or more process(es) to determine that an individual no longer requires retention of access following reassignments or transfers but, for one individual, did not revoke the authorized electronic access to individual accounts and authorized unescorted physical access by the end of the next calendar</p>	<p>complete the removal within 24 hours of the termination action but did not initiate those removals for two individuals, and did not identify, assess, and correct the deficiencies. (5.1)</p> <p>OR</p> <p>The Responsible Entity has implemented one or more process(es) to determine that an individual no longer requires retention of access following reassignments or transfers but, for two individuals, did not revoke the authorized electronic access to individual accounts and authorized unescorted physical access by the end of the next calendar</p>	<p>Information storage locations. (R5)</p> <p>OR</p> <p>The Responsible Entity has implemented one or more process(es) to remove the ability for unescorted physical access and Interactive Remote Access upon a termination action or complete the removal within 24 hours of the termination action but did not initiate those removals for three or more individuals, and did not identify, assess, and correct the deficiencies. (5.1)</p> <p>OR</p> <p>The Responsible Entity has implemented one or more process(es) to determine that an individual no longer</p>

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			<p>one or more process(es) to revoke the individual’s user accounts upon termination action but did not do so for within 30 calendar days of the date of termination action for one or more individuals, and did not identify, assess, and correct the deficiencies. (5.4)</p> <p>OR</p> <p>The Responsible Entity has implemented one or more process(es) to</p>	<p>day following the predetermined date, and did not identify, assess, and correct the deficiencies. (5.2)</p> <p>OR</p> <p>The Responsible Entity has implemented one or more process(es) to revoke the individual’s access to the designated storage locations for BES Cyber System Information but, for two individuals, did not do so by the end of the next calendar day following the effective date and time of the termination action, and did not identify, assess, and correct the deficiencies. (5.3)</p>	<p>day following the predetermined date, and did not identify, assess, and correct the deficiencies. (5.2)</p> <p>OR</p> <p>The Responsible Entity has implemented one or more process(es) to revoke the individual’s access to the designated storage locations for BES Cyber System Information but, for three or more individuals, did not do so by the end of the next calendar day following the effective date and time of the termination action, and did not identify, assess, and correct the deficiencies. (5.3)</p>	<p>requires retention of access following reassignments or transfers but, for three or more individuals, did not revoke the authorized electronic access to individual accounts and authorized unescorted physical access by the end of the next calendar day following the predetermined date, and did not identify, assess, and correct the deficiencies. (5.2)</p>

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			change passwords for shared accounts known to the user upon termination action, reassignment, or transfer, but did not do so for within 30 calendar days of the date of termination action, reassignment, or transfer for one or more individuals, and did not identify, assess, and correct the deficiencies. (5.5)  OR  The Responsible			

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			Entity has implemented one or more process(es) to determine and document extenuating operating circumstances following a termination action, reassignment, or transfer, but did not change one or more passwords for shared accounts known to the user within 10 calendar days following the end of the extenuating operating circumstances, and did not			

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			identify, assess, and correct the deficiencies. (5.5)			

**D. Regional Variances**

None.

**E. Interpretations**

None.

**F. Associated Documents**

None.

**Guidelines and Technical Basis**

**Section 4 – Scope of Applicability of the CIP Cyber Security Standards**

Section “4. Applicability” of the standards provides important information for Responsible Entities to determine the scope of the applicability of the CIP Cyber Security Requirements.

Section “4.1. Functional Entities” is a list of NERC functional entities to which the standard applies. If the entity is registered as one or more of the functional entities listed in Section 4.1, then the NERC CIP Cyber Security Standards apply. Note that there is a qualification in Section 4.1 that restricts the applicability in the case of Distribution Providers to only those that own certain types of systems and equipment listed in 4.2. Furthermore,

Section “4.2. Facilities” defines the scope of the Facilities, systems, and equipment owned by the Responsible Entity, as qualified in Section 4.1, that is subject to the requirements of the standard. As specified in the exemption section 4.2.3.5, this standard does not apply to Responsible Entities that do not have High Impact or Medium Impact BES Cyber Systems under CIP-002-5’s categorization. In addition to the set of BES Facilities, Control Centers, and other systems and equipment, the list includes the set of systems and equipment owned by Distribution Providers. While the NERC Glossary term “Facilities” already includes the BES characteristic, the additional use of the term BES here is meant to reinforce the scope of applicability of these Facilities where it is used, especially in this applicability scoping section. This in effect sets the scope of Facilities, systems, and equipment that is subject to the standards.

**Requirement R1:**

The security awareness program is intended to be an informational program, not a formal training program. It should reinforce security practices to ensure that personnel maintain awareness of best practices for both physical and electronic security to protect its BES Cyber Systems. The Responsible Entity is not required to provide records that show that each individual received or understood the information, but they must maintain documentation of the program materials utilized in the form of posters, memos, and/or presentations.

Examples of possible mechanisms and evidence, when dated, which can be used are:



- Direct communications (e.g., emails, memos, computer based training, etc.);
- Indirect communications (e.g., posters, intranet, brochures, etc.);
- Management support and reinforcement (e.g., presentations, meetings, etc.).

### **Requirement R2:**

Training shall cover the policies, access controls, and procedures as developed for the BES Cyber Systems and include, at a minimum, the required items appropriate to personnel roles and responsibilities from Table R2. The Responsible Entity has the flexibility to define the training program and it may consist of multiple modules and multiple delivery mechanisms, but a single training program for all individuals needing to be trained is acceptable. The training can focus on functions, roles or responsibilities at the discretion of the Responsible Entity.

One new element in the training content is intended to encompass networking hardware and software and other issues of electronic interconnectivity supporting the operation and control of BES Cyber Systems as per FERC Order No. 706, Paragraph 434. This is not intended to provide technical training to individuals supporting networking hardware and software, but educating system users of the cyber security risks associated with the interconnectedness of these systems. The users, based on their function, role or responsibility, should have a basic understanding of which systems can be accessed from other systems and how the actions they take can affect cyber security.

Each Responsible Entity shall ensure all personnel who are granted authorized electronic access and/or authorized unescorted physical access to its BES Cyber Systems, including contractors and service vendors, complete cyber security training prior to their being granted authorized access, except for CIP Exceptional Circumstances. To retain the authorized accesses, individuals must complete the training at least one every 15 months.

### **Requirement R3:**

Each Responsible Entity shall ensure a personnel risk assessment is performed for all personnel who are granted authorized electronic access and/or authorized unescorted physical access to its BES Cyber Systems, including contractors and service vendors, prior to their being granted authorized access, except for program specified exceptional circumstances that are approved by the single senior management official or their delegate and impact the reliability of the BES or emergency response. Identity should be confirmed in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements. Identity only needs to be confirmed prior to initially granting access and only requires periodic confirmation according to the entity's process during the tenure of employment, which may or may not be the same as the initial verification action.

A seven year criminal history check should be performed for those locations where the individual has resided for at least six consecutive months. This check should also be performed in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements. When it is not possible to perform a full seven year criminal history check, documentation must be made of what criminal history check was performed, and the reasons a full seven-year check could not be performed. Examples of this could include

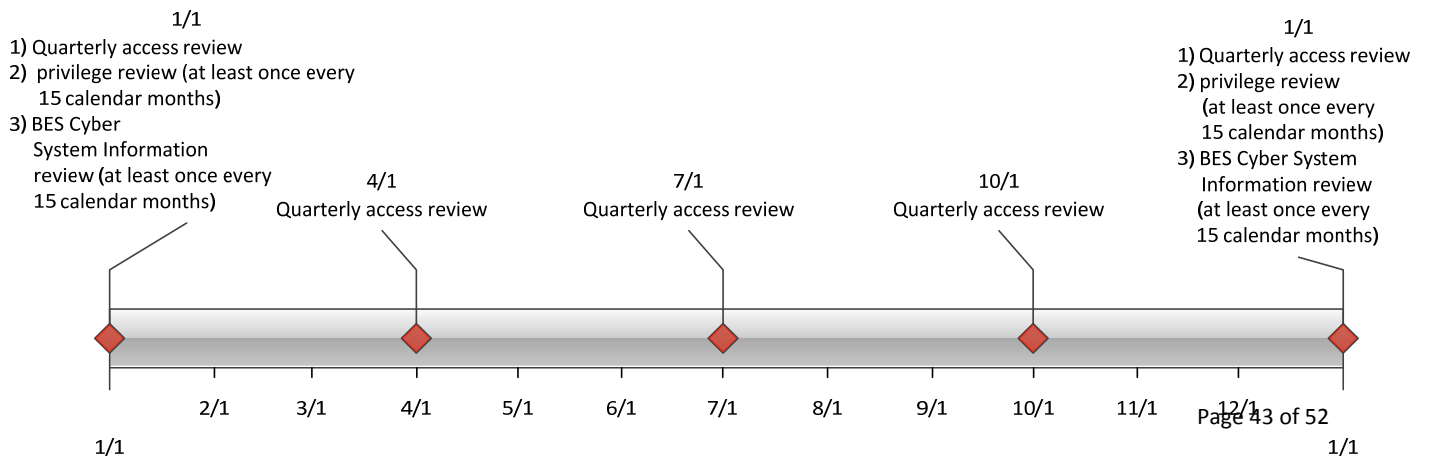
individuals under the age of 25 where a juvenile criminal history may be protected by law, individuals who may have resided in locations from where it is not possible to obtain a criminal history records check, violates the law or is not allowed under the existing collective bargaining agreement. The Responsible Entity should consider the absence of information for the full seven years when assessing the risk of granting access during the process to evaluate the criminal history check. There needs to be a personnel risk assessment that has been completed within the last seven years for each individual with access. A new criminal history records check must be performed as part of the new PRA. Individuals who have been granted access under a previous version of these standards need a new PRA within seven years of the date of their last PRA. The clarifications around the seven year criminal history check in this version do not require a new PRA be performed by the implementation date.

**Requirement R4:**

Authorization for electronic and unescorted physical access and access to BES Cyber System Information must be on the basis of necessity in the individual performing a work function. Documentation showing the authorization should have some justification of the business need included. To ensure proper segregation of duties, access authorization and provisioning should not be performed by the same person where possible.

This requirement specifies both quarterly reviews and reviews at least once every 15 calendar months. Quarterly reviews are to perform a validation that only authorized users have been granted access to BES Cyber Systems. This is achieved by comparing individuals actually provisioned to a BES Cyber System against records of individuals authorized to the BES Cyber System. The focus of this requirement is on the integrity of provisioning access rather than individual accounts on all BES Cyber Assets. The list of provisioned individuals can be an automatically generated account listing. However, in a BES Cyber System with several account databases, the list of provisioned individuals may come from other records such as provisioning workflow or a user account database where provisioning typically initiates.

The privilege review at least once every 15 calendar months is more detailed to ensure an individual’s associated privileges are the minimum necessary to perform their work function (i.e., least privilege). Entities can more efficiently perform this review by implementing role-based access. This involves determining the specific roles on the system (e.g., system operator, technician, report viewer, administrator, etc.) then grouping access privileges to the role and assigning users to the role. Role-based access does not assume any specific software and can be implemented by defining specific provisioning processes for each role where access group



assignments cannot be performed. Role-based access permissions eliminate the need to perform the privilege review on individual accounts. An example timeline of all the reviews in Requirement R4 is included below.

Separation of duties should be considered when performing the reviews in Requirement R4. The person reviewing should be different than the person provisioning access.

If the results of quarterly or at least once every 15 calendar months account reviews indicate an administrative or clerical error in which access was not actually provisioned, then the SDT intends that this error should not be considered a violation of this requirement.

For BES Cyber Systems that do not have user accounts defined, the controls listed in Requirement R4 are not applicable. However, the Responsible Entity should document such configurations.

**Requirement R5:**

The requirement to revoke access at the time of the termination action includes procedures showing revocation of access concurrent with the termination action. This requirement recognizes that the timing of the termination action may vary depending on the circumstance. Some common scenarios and possible processes on when the termination action occurs are provided in the following table. These scenarios are not an exhaustive list of all scenarios, but are representative of several routine business practices.

Scenario	Possible Process
Immediate involuntary termination	Human resources or corporate security escorts the individual off site and the supervisor or human resources personnel notify the appropriate personnel to begin the revocation process.
Scheduled involuntary termination	Human resources personnel are notified of the termination and work with appropriate personnel to schedule the revocation of access at the time of termination.
Voluntary termination	Human resources personnel are notified of the termination and work with appropriate personnel to schedule the revocation of access at the time of termination.
Retirement where the last working day is several weeks prior to the termination date	Human resources personnel coordinate with manager to determine the final date access is no longer needed and schedule the revocation of access on the determined day.
Death	Human resources personnel are notified of the death and work with appropriate personnel to begin the revocation process.

Revocation of electronic access should be understood to mean a process with the end result that electronic access to BES Cyber Systems is no longer possible using credentials assigned to or known by the individual(s) whose access privileges are being revoked. Steps taken to accomplish this outcome may include deletion or deactivation of accounts used by the individual(s), but no specific actions are prescribed. Entities should consider the ramifications of deleting an account may include incomplete event log entries due to an unrecognized account or system services using the account to log on.

The initial revocation required in Requirement R5.1 includes unescorted physical access and Interactive Remote Access. These two actions should prevent any further access by the individual after termination. If an individual still has local access accounts (i.e., accounts on the Cyber Asset itself) on BES Cyber Assets, then the Responsible Entity has 30 days to complete the revocation process for those accounts. However, nothing prevents a Responsible Entity from performing all of the access revocation at the time of termination.

For transferred or reassigned individuals, a review of access privileges should be performed. This review could entail a simple listing of all authorizations for an individual and working with the respective managers to determine which access will still be needed in the new position. For instances in which the individual still needs to retain access as part of a transitory period, the entity should schedule a time to review these access privileges or include the privileges in the quarterly account review or annual privilege review.

Revocation of access to shared accounts is called out separately to prevent the situation where passwords on substation and generation devices are constantly changed due to staff turnover.

Requirement 5.5 specified that passwords for shared account are to be changed within 30 calendar days of the termination action or when the Responsible Entity determines an individual no longer requires access to the account as a result of a reassignment or transfer. The 30 days applies under normal operating conditions. However, circumstances may occur where this is not possible. Some systems may require an outage or reboot of the system in order to complete the password change. In periods of extreme heat or cold, many Responsible Entities may prohibit system outages and reboots in order to maintain reliability of the BES. When these circumstances occur, the Responsible Entity must document these circumstances and prepare to change the password within 10 calendar days following the end of the operating circumstances. Records of activities must be retained to show that the Responsible Entity followed the plan they created.

## **Rationale:**

During the development of this standard, references to prior versions of the CIP standards and rationale for the requirements and their parts were embedded within the standard. Upon BOT approval, that information was moved to this section.

### **Rationale for R1:**

Ensures that Responsible Entities with personnel who have authorized electronic or authorized unescorted physical access to BES Cyber Assets take action so that those personnel with such authorized electronic or authorized unescorted physical access maintain awareness of the Responsible Entity's security practices.

**Summary of Changes:** Reformatted into table structure.

**Reference to prior version:** (Part 1.1) CIP-004-4, R1

**Change Rationale:** (Part 1.1)

*Changed to remove the need to ensure or prove everyone with authorized electronic or authorized unescorted physical access "received" ongoing reinforcement – to state that security awareness has been reinforced.*

*Moved example mechanisms to guidance.*

### **Rationale for R2:**

To ensure that the Responsible Entity's training program for personnel who need authorized electronic access and/or authorized unescorted physical access to BES Cyber Systems covers the proper policies, access controls, and procedures to protect BES Cyber Systems and are trained before access is authorized.

Based on their role, some personnel may not require training on all topics.

### **Summary of Changes:**

1. Addition of specific role training for:

- The visitor control program
- Electronic interconnectivity supporting the operation and control of BES Cyber Systems
- Storage media as part of the handling of BES Cyber Systems information

2. Change references from Critical Cyber Assets to BES Cyber Systems.

**Reference to prior version:** (Part 2.1) CIP004-4, R2.2.1

**Change Rationale:** (Part 2.1)

*Removed "proper use of Critical Cyber Assets" concept from previous versions to focus the requirement on cyber security issues, not the business function. The previous version was*

*focused more on the business or functional use of the BES Cyber System and is outside the scope of cyber security. Personnel who will administer the visitor control process or serve as escorts for visitors need training on the program. Core training on the handling of BES Cyber System (not Critical Cyber Assets) Information, with the addition of storage; FERC Order No. 706, paragraph 413 and paragraphs 632-634, 688, 732-734; DHS 2.4.16. Core training on the identification and reporting of a Cyber Security Incident; FERC Order No. 706, Paragraph 413; Related to CIP-008-5 & DHS Incident Reporting requirements for those with roles in incident reporting. Core training on the action plans and procedures to recover or re-establish BES Cyber Systems for personnel having a role in the recovery; FERC Order No. 706, Paragraph 413. Core training programs are intended to encompass networking hardware and software and other issues of electronic interconnectivity supporting the operation and control of BES Cyber Systems; FERC Order No. 706, Paragraph 434.*

**Reference to prior version:** (Part 2.2) CIP004-4, R2.1

**Change Rationale:** (Part 2.2)

*Addition of exceptional circumstances parameters as directed in FERC Order No. 706, Paragraph 431 is detailed in CIP-003-5.*

**Reference to prior version:** (Part 2.3) CIP004-4, R2.3

**Change Rationale:** (Part 2.3)

*Updated to replace “annually” with “once every 15 calendar months.”*

### **Rationale for R3:**

To ensure that individuals who need authorized electronic or authorized unescorted physical access to BES Cyber Systems have been assessed for risk. Whether initial access or maintaining access, those with access must have had a personnel risk assessment completed within the last 7 years.

**Summary of Changes:** Specify that the seven year criminal history check covers all locations where the individual has resided for six consecutive months or more, including current residence regardless of duration.

**Reference to prior version:** (Part 3.1) CIP004-4, R3.1

**Change Rationale:** (Part 3.1)

*Addressed interpretation request in guidance. Specified that process for identity confirmation is required. The implementation plan clarifies that a documented identity verification conducted under an earlier version of the CIP standards is sufficient.*

**Reference to prior version:** (Part 3.2) CIP004-4, R3.1

**Change Rationale:** (Part 3.2)

*Specify that the seven year criminal history check covers all locations where the individual has resided for six months or more, including current residence regardless of duration. Added*

*additional wording based on interpretation request. Provision is made for when a full seven-year check cannot be performed.*

**Reference to prior version:** (Part 3.3) New

**Change Rationale:** (Part 3.3)

*There should be documented criteria or a process used to evaluate criminal history records checks for authorizing access.*

**Reference to prior version:** (Part 3.4) CIP-004-4, R3.3

**Change Rationale:** (Part 3.4)

*Separated into its own table item.*

**Reference to prior version:** (Part 3.5) CIP-004-3, R3, R3.3

**Change Rationale:** (Part 3.5)

*Whether for initial access or maintaining access, establishes that those with access must have had PRA completed within 7 years. This covers both initial and renewal. The implementation plan specifies that initial performance of this requirement is 7 years after the last personnel risk assessment that was performed pursuant to a previous version of the CIP Cyber Security Standards for a personnel risk assessment. CIP-004-3, R3, R3.3*

#### **Rationale for R4:**

To ensure that individuals with access to BES Cyber Systems and the physical and electronic locations where BES Cyber System Information is stored by the Responsible Entity have been properly authorized for such access. "Authorization" should be considered to be a grant of permission by a person or persons empowered by the Responsible Entity to perform such grants and included in the delegations referenced in CIP-003-5. "Provisioning" should be considered the actions to provide access to an individual.

Access is physical, logical, and remote permissions granted to Cyber Assets composing the BES Cyber System or allowing access to the BES Cyber System. When granting, reviewing, or revoking access, the Responsible Entity must address the Cyber Asset specifically as well as the systems used to enable such access (i.e., physical access control system, remote access system, directory services).

CIP Exceptional Circumstances are defined in a Responsible Entity's policy from CIP-003-5 and allow an exception to the requirement for authorization to BES Cyber Systems and BES Cyber System Information.

Quarterly reviews in Part 4.5 are to perform a validation that only authorized users have been granted access to BES Cyber Systems. This is achieved by comparing individuals actually provisioned to a BES Cyber System against records of individuals authorized to access the BES Cyber System. The focus of this requirement is on the integrity of provisioning access rather than individual accounts on all BES Cyber Assets. The list of provisioned individuals can be an automatically generated account listing. However, in a BES Cyber System with several account

databases, the list of provisioned individuals may come from other records such as provisioning workflow or a user account database where provisioning typically initiates.

If the results of quarterly or annual account reviews indicate an administrative or clerical error in which access was not actually provisioned, then the SDT intends that the error should not be considered a violation of this requirement.

For BES Cyber Systems that do not have user accounts defined, the controls listed in Requirement R4 are not applicable. However, the Responsible Entity should document such configurations.

**Summary of Changes:** The primary change was in pulling the access management requirements from CIP-003-4, CIP-004-4, and CIP-007-4 into a single requirement. The requirements from Version 4 remain largely unchanged except to clarify some terminology. The purpose for combining these requirements is to remove the perceived redundancy in authorization and review. The requirement in CIP-004-4 R4 to maintain a list of authorized personnel has been removed because the list represents only one form of evidence to demonstrate compliance that only authorized persons have access.

**Reference to prior version:** (Part 4.1) CIP 003-4, R5.1 and R5.2; CIP-006-4, R1.5 and R4; CIP-007-4, R5.1 and R5.1.1

**Change Rationale:** (Part 4.1)

Combined requirements from CIP-003-4, CIP-007-4, and CIP-006-4 to make the authorization process clear and consistent. *CIP-003-4, CIP-004-4, CIP-006-4, and CIP-007-4 all reference authorization of access in some form, and CIP-003-4 and CIP-007-4 require authorization on a “need to know” basis or with respect to work functions performed. These were consolidated to ensure consistency in the requirement language.*

**Reference to prior version:** (Part 4.2) CIP 004-4, R4.1

**Change Rationale:** (Part 4.2)

*Feedback among team members, observers, and regional CIP auditors indicates there has been confusion in implementation around what the term “review” entailed in CIP-004-4, Requirement R4.1. This requirement clarifies the review should occur between the provisioned access and authorized access.*

**Reference to prior version:** (Part 4.3) CIP 007-4, R5.1.3

**Change Rationale:** (Part 4.3)

*Moved requirements to ensure consistency and eliminate the cross-referencing of requirements. Clarified what was necessary in performing verification by stating the objective was to confirm that access privileges are correct and the minimum necessary.*

**Reference to prior version:** (Part 4.4) CIP-003-4, R5.1.2

**Change Rationale:** (Part 4.4)

*Moved requirement to ensure consistency among access reviews. Clarified precise meaning of annual. Clarified what was necessary in performing a verification by stating the objective was to*



*confirm access privileges are correct and the minimum necessary for performing assigned work functions.*

**Rationale for R5:**

The timely revocation of electronic access to BES Cyber Systems is an essential element of an access management regime. When an individual no longer requires access to a BES Cyber System to perform his or her assigned functions, that access should be revoked. This is of particular importance in situations where a change of assignment or employment is involuntary, as there is a risk the individual(s) involved will react in a hostile or destructive manner.

In considering how to address directives in FERC Order No. 706 directing “immediate” revocation of access for involuntary separation, the SDT chose not to specify hourly time parameters in the requirement (e.g., revoking access within 1 hour). The point in time at which an organization terminates a person cannot generally be determined down to the hour. However, most organizations have formal termination processes, and the timeliest revocation of access occurs in concurrence with the initial processes of termination.

Access is physical, logical, and remote permissions granted to Cyber Assets composing the BES Cyber System or allowing access to the BES Cyber System. When granting, reviewing, or revoking access, the Responsible Entity must address the Cyber Asset specifically as well as the systems used to enable such access (e.g., physical access control system, remote access system, directory services).

**Summary of Changes:** FERC Order No. 706, Paragraphs 460 and 461, state the following: “The Commission adopts the CIP NOPR proposal to direct the ERO to develop modifications to CIP-004-1 to require immediate revocation of access privileges when an employee, contractor or vendor no longer performs a function that requires physical or electronic access to a Critical Cyber Asset for any reason (including disciplinary action, transfer, retirement, or termination).

As a general matter, the Commission believes that revoking access when an employee no longer needs it, either because of a change in job or the end of employment, must be immediate.”

**Reference to prior version:** (Part 5.1) CIP 004-4, R4.2

**Change Rationale:** (Part 5.1)

*The FERC Order No. 706, Paragraphs 460 and 461, directs modifications to the Standards to **require immediate revocation** for any person no longer needing access. To address this directive, this requirement specifies revocation concurrent with the termination instead of within 24 hours.*

**Reference to prior version:** (Part 5.2) CIP-004-4, R4.2

**Change Rationale:** (Part 5.2)

*FERC Order No. 706, Paragraph 460 and 461, direct modifications to the Standards to require immediate revocation for any person no longer needing access, including transferred employees. In reviewing how to modify this requirement, the SDT determined the date a person no longer needs access after a transfer was problematic because the need may change over time. As a result, the SDT adapted this requirement from NIST 800-53 Version 3 to review access authorizations on the date of the transfer. The SDT felt this was a more effective control in accomplishing the objective to prevent a person from accumulating unnecessary authorizations through transfers.*

**Reference to prior version:** (Part 5.3) New

**Change Rationale:** (Part 5.3)

*FERC Order No. 706, Paragraph 386, directs modifications to the standards to require prompt revocation of access to protected information. To address this directive, Responsible Entities are required to revoke access to areas designated for BES Cyber System Information. This could include records closets, substation control houses, records management systems, file shares or other physical and logical areas under the Responsible Entity's control.*

**Reference to prior version:** (Part 5.4) New

**Change Rationale:** (Part 5.4)

*FERC Order No. 706, Paragraph 460 and 461, direct modifications to the Standards to require immediate revocation for any person no longer needing access. In order to meet the immediate timeframe, Responsible Entities will likely have initial revocation procedures to prevent remote and physical access to the BES Cyber System. Some cases may take more time to coordinate access revocation on individual Cyber Assets and applications without affecting reliability. This requirement provides the additional time to review and complete the revocation process. Although the initial actions already prevent further access, this step provides additional assurance in the access revocation process.*

**Reference to prior version:** (Part 5.5) CIP-007-4, R5.2.3

**Change Rationale:** (Part 5.5)

*To provide clarification of expected actions in managing the passwords.*

## Version History

Version	Date	Action	Change Tracking
1	1/16/06	R3.2 — Change “Control Center” to “control center.”	3/24/06
2	9/30/09	Modifications to clarify the requirements and to bring the compliance elements into conformance with the latest guidelines for developing compliance elements of standards. Removal of reasonable business judgment. Replaced the RRO with the RE as a responsible entity. Rewording of Effective Date. Changed compliance monitor to Compliance Enforcement Authority.	
3	12/16/09	Updated version number from -2 to -3 Approved by the NERC Board of Trustees.	
3	3/31/10	Approved by FERC.	
4	12/30/10	Modified to add specific criteria for Critical Asset identification.	Update
4	1/24/11	Approved by the NERC Board of Trustees.	Update
5	11/26/12	Adopted by the NERC Board of Trustees.	Modified to coordinate with other CIP standards and to revise format to use RBS Template.
5.1	TBD	Modified two VSLs in R4.	Errata

## A. Introduction

1. **Title:** Cyber Security — Personnel & Training

2. **Number:** CIP-004-5.1

3. **Purpose:** To minimize the risk against compromise that could lead to misoperation or instability in the BES from individuals accessing BES Cyber Systems by requiring an appropriate level of personnel risk assessment, training, and security awareness in support of protecting BES Cyber Systems.

### 4. Applicability:

**4.1. Functional Entities:** For the purpose of the requirements contained herein, the following list of functional entities will be collectively referred to as “Responsible Entities.” For requirements in this standard where a specific functional entity or subset of functional entities are the applicable entity or entities, the functional entity or entities are specified explicitly.

#### 4.1.1. Balancing Authority

**4.1.2. Distribution Provider** that owns one or more of the following Facilities, systems, and equipment for the protection or restoration of the BES:

**4.1.2.1.** Each underfrequency Load shedding (UFLS) or undervoltage Load shedding (UVLS) system that:

**4.1.2.1.1.** is part of a Load shedding program that is subject to one or more requirements in a NERC or Regional Reliability Standard; and

**4.1.2.1.2.** performs automatic Load shedding under a common control system owned by the Responsible Entity, without human operator initiation, of 300 MW or more.

**4.1.2.2.** Each Special Protection System or Remedial Action Scheme where the Special Protection System or Remedial Action Scheme is subject to one or more requirements in a NERC or Regional Reliability Standard.

**4.1.2.3.** Each Protection System (excluding UFLS and UVLS) that applies to Transmission where the Protection System is subject to one or more requirements in a NERC or Regional Reliability Standard.

**4.1.2.4.** Each Cranking Path and group of Elements meeting the initial switching requirements from a Blackstart Resource up to and including the first interconnection point of the starting station service of the next generation unit(s) to be started.

#### 4.1.3. Generator Operator

#### 4.1.4. Generator Owner

#### 4.1.5. Interchange Coordinator or Interchange Authority

**4.1.6. Reliability Coordinator**

**4.1.7. Transmission Operator**

**4.1.8. Transmission Owner**

**4.2. Facilities:** For the purpose of the requirements contained herein, the following Facilities, systems, and equipment owned by each Responsible Entity in 4.1 above are those to which these requirements are applicable. For requirements in this standard where a specific type of Facilities, system, or equipment or subset of Facilities, systems, and equipment are applicable, these are specified explicitly.

**4.2.1. Distribution Provider:** One or more of the following Facilities, systems and equipment owned by the Distribution Provider for the protection or restoration of the BES:

**4.2.1.1.** Each UFLS or UVLS System that:

**4.2.1.1.1.** is part of a Load shedding program that is subject to one or more requirements in a NERC or Regional Reliability Standard; and

**4.2.1.1.2.** performs automatic Load shedding under a common control system owned by the Responsible Entity, without human operator initiation, of 300 MW or more.

**4.2.1.2.** Each Special Protection System or Remedial Action Scheme where the Special Protection System or Remedial Action Scheme is subject to one or more requirements in a NERC or Regional Reliability Standard.

**4.2.1.3.** Each Protection System (excluding UFLS and UVLS) that applies to Transmission where the Protection System is subject to one or more requirements in a NERC or Regional Reliability Standard.

**4.2.1.4.** Each Cranking Path and group of Elements meeting the initial switching requirements from a Blackstart Resource up to and including the first interconnection point of the starting station service of the next generation unit(s) to be started.

**4.2.2. Responsible Entities listed in 4.1 other than Distribution Providers:**

All BES Facilities.

**4.2.3. Exemptions:** The following are exempt from Standard CIP-004-5.1:

**4.2.3.1.** Cyber Assets at Facilities regulated by the Canadian Nuclear Safety Commission.

**4.2.3.2.** Cyber Assets associated with communication networks and data communication links between discrete Electronic Security Perimeters.

**4.2.3.3.** The systems, structures, and components that are regulated by the Nuclear Regulatory Commission under a cyber security plan pursuant to 10 C.F.R. Section 73.54.

**4.2.3.4.** For Distribution Providers, the systems and equipment that are not included in section 4.2.1 above.

**4.2.3.5.** Responsible Entities that identify that they have no BES Cyber Systems categorized as high impact or medium impact according to the CIP-002-5 identification and categorization processes.

## 5. Effective Dates:

1. **24 Months Minimum** – CIP-004-5.1 shall become effective on the later of July 1, 2015, or the first calendar day of the ninth calendar quarter after the effective date of the order providing applicable regulatory approval.
2. In those jurisdictions where no regulatory approval is required, CIP-004-5.1 shall become effective on the first day of the ninth calendar quarter following Board of Trustees' approval, or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities.

## 6. Background:

Standard CIP-004-5.1 exists as part of a suite of CIP Standards related to cyber security. CIP-002-5 requires the initial identification and categorization of BES Cyber Systems. CIP-003-5, CIP-004-5, CIP-005-5, CIP-006-5, CIP-007-5, CIP-008-5, CIP-009-5, CIP-010-1 and CIP-011-1 require a minimum level of organizational, operational and procedural controls to mitigate risk to BES Cyber Systems. This suite of CIP Standards is referred to as the *Version 5 CIP Cyber Security Standards*.

Most requirements open with, *“Each Responsible Entity shall implement one or more documented [processes, plan, etc] that include the applicable items in [Table Reference].”* The referenced table requires the applicable items in the procedures for the requirement’s common subject matter.

The SDT has incorporated within this standard a recognition that certain requirements should not focus on individual instances of failure as a sole basis for violating the standard. In particular, the SDT has incorporated an approach to empower and enable the industry to identify, assess, and correct deficiencies in the implementation of certain requirements. The intent is to change the basis of a violation in those requirements so that they are not focused on *whether* there is a deficiency, but on identifying, assessing, and correcting deficiencies. It is presented in those requirements by modifying “implement” as follows:

Each Responsible Entity shall implement, **in a manner that identifies, assesses, and corrects deficiencies, . . .**

The term *documented processes* refers to a set of required instructions specific to the Responsible Entity and to achieve a specific outcome. This term does not imply any particular naming or approval structure beyond what is stated in the requirements. An entity should include as much as it believes necessary in their documented processes, but they must address the applicable requirements in the table. The documented processes themselves are not required to include the “. . . identifies, assesses, and corrects deficiencies, . . .” elements described in the preceding paragraph, as those aspects are related to the manner of

implementation of the documented processes and could be accomplished through other controls or compliance management activities.

The terms *program* and *plan* are sometimes used in place of *documented processes* where it makes sense and is commonly understood. For example, documented processes describing a response are typically referred to as *plans* (i.e., incident response plans and recovery plans). Likewise, a security plan can describe an approach involving multiple procedures to address a broad subject matter.

Similarly, the term *program* may refer to the organization’s overall implementation of its policies, plans and procedures involving a subject matter. Examples in the standards include the personnel risk assessment program and the personnel training program. The full implementation of the CIP Cyber Security Standards could also be referred to as a program. However, the terms *program* and *plan* do not imply any additional requirements beyond what is stated in the standards.

Responsible Entities can implement common controls that meet requirements for multiple high and medium impact BES Cyber Systems. For example, a single training program could meet the requirements for training personnel across multiple BES Cyber Systems.

Measures for the initial requirement are simply the documented processes themselves. Measures in the table rows provide examples of evidence to show documentation and implementation of applicable items in the documented processes. These measures serve to provide guidance to entities in acceptable records of compliance and should not be viewed as an all-inclusive list.

Throughout the standards, unless otherwise stated, bulleted items in the requirements and measures are items that are linked with an “or,” and numbered items are items that are linked with an “and.”

Many references in the Applicability section use a threshold of 300 MW for UFLS and UVLS. This particular threshold of 300 MW for UVLS and UFLS was provided in Version 1 of the CIP Cyber Security Standards. The threshold remains at 300 MW since it is specifically addressing UVLS and UFLS, which are last ditch efforts to save the Bulk Electric System. A review of UFLS tolerances defined within regional reliability standards for UFLS program requirements to date indicates that the historical value of 300 MW represents an adequate and reasonable threshold value for allowable UFLS operational tolerances.

#### **“Applicable Systems” Columns in Tables:**

Each table has an “Applicable Systems” column to further define the scope of systems to which a specific requirement row applies. The CSO706 SDT adapted this concept from the National Institute of Standards and Technology (“NIST”) Risk Management Framework as a way of applying requirements more appropriately based on impact and connectivity characteristics. The following conventions are used in the “Applicable Systems” column as described.

- **High Impact BES Cyber Systems** – Applies to BES Cyber Systems categorized as high impact according to the CIP-002-5 identification and categorization processes.

- **Medium Impact BES Cyber Systems** – Applies to BES Cyber Systems categorized as medium impact according to the CIP-002-5 identification and categorization processes.
- **Medium Impact BES Cyber Systems with External Routable Connectivity** – Only applies to medium impact BES Cyber Systems with External Routable Connectivity. This also excludes Cyber Assets in the BES Cyber System that cannot be directly accessed through External Routable Connectivity.
- **Electronic Access Control or Monitoring Systems (EACMS)** – Applies to each Electronic Access Control or Monitoring System associated with a referenced high impact BES Cyber System or medium impact BES Cyber System. Examples may include, but are not limited to, firewalls, authentication servers, and log monitoring and alerting systems.
- **Physical Access Control Systems (PACS)** – Applies to each Physical Access Control System associated with a referenced high impact BES Cyber System or medium impact BES Cyber System with External Routable Connectivity.



**B. Requirements and Measures**

- R1.** Each Responsible Entity shall implement one or more documented processes that collectively include each of the applicable requirement parts in *CIP-004-5.1 Table R1 – Security Awareness Program*. [Violation Risk Factor: Lower] [Time Horizon: Operations Planning]
- M1.** Evidence must include each of the applicable documented processes that collectively include each of the applicable requirement parts in *CIP-004-5.1 Table R1 – Security Awareness Program* and additional evidence to demonstrate implementation as described in the Measures column of the table.

CIP-004-5.1 Table R1 – Security Awareness Program			
Part	Applicable Systems	Requirements	Measures
1.1	High Impact BES Cyber Systems Medium Impact BES Cyber Systems	Security awareness that, at least once each calendar quarter, reinforces cyber security practices (which may include associated physical security practices) for the Responsible Entity’s personnel who have authorized electronic or authorized unescorted physical access to BES Cyber Systems.	An example of evidence may include, but is not limited to, documentation that the quarterly reinforcement has been provided. Examples of evidence of reinforcement may include, but are not limited to, dated copies of information used to reinforce security awareness, as well as evidence of distribution, such as: <ul style="list-style-type: none"> <li>• direct communications (for example, e-mails, memos, computer-based training); or</li> <li>• indirect communications (for example, posters, intranet, or brochures); or</li> <li>• management support and reinforcement (for example, presentations or meetings).</li> </ul>

- R2.** Each Responsible Entity shall implement, in a manner that identifies, assesses, and corrects deficiencies, a cyber security training program(s) appropriate to individual roles, functions, or responsibilities that collectively includes each of the applicable requirement parts in *CIP-004-5.1 Table R2 – Cyber Security Training Program*. [*Violation Risk Factor: Lower*]  
[*Time Horizon: Operations Planning*]
- M2.** Evidence must include the training program that includes each of the applicable requirement parts in *CIP-004-5.1 Table R2 – Cyber Security Training Program* and additional evidence to demonstrate implementation of the program(s).

CIP-004-5.1 Table R2 – Cyber Security Training Program

Part	Applicable Systems	Requirements	Measures
2.1	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Training content on:</p> <ol style="list-style-type: none"> <li>2.1.1. Cyber security policies;</li> <li>2.1.2. Physical access controls;</li> <li>2.1.3. Electronic access controls;</li> <li>2.1.4. The visitor control program;</li> <li>2.1.5. Handling of BES Cyber System Information and its storage;</li> <li>2.1.6. Identification of a Cyber Security Incident and initial notifications in accordance with the entity’s incident response plan;</li> <li>2.1.7. Recovery plans for BES Cyber Systems;</li> <li>2.1.8. Response to Cyber Security Incidents; and</li> <li>2.1.9. Cyber security risks associated with a BES Cyber System’s electronic interconnectivity and interoperability with other Cyber Assets.</li> </ol>	<p>Examples of evidence may include, but are not limited to, training material such as power point presentations, instructor notes, student notes, handouts, or other training materials.</p>

CIP-004-5.1 Table R2 – Cyber Security Training Program			
Part	Applicable Systems	Requirements	Measures
2.2	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Require completion of the training specified in Part 2.1 prior to granting authorized electronic access and authorized unescorted physical access to applicable Cyber Assets, except during CIP Exceptional Circumstances.</p>	<p>Examples of evidence may include, but are not limited to, training records and documentation of when CIP Exceptional Circumstances were invoked.</p>
2.3	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Require completion of the training specified in Part 2.1 at least once every 15 calendar months.</p>	<p>Examples of evidence may include, but are not limited to, dated individual training records.</p>

**R3.** Each Responsible Entity shall implement, in a manner that identifies, assesses, and corrects deficiencies, one or more documented personnel risk assessment programs to attain and retain authorized electronic or authorized unescorted physical access to BES Cyber Systems that collectively include each of the applicable requirement parts in *CIP-004-5.1 Table R3 – Personnel Risk Assessment Program*. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning].

**M3.** Evidence must include the documented personnel risk assessment programs that collectively include each of the applicable requirement parts in *CIP-004-5.1 Table R3 – Personnel Risk Assessment Program* and additional evidence to demonstrate implementation of the program(s).

CIP-004-5.1 Table R3 – Personnel Risk Assessment Program			
Part	Applicable Systems	Requirements	Measures
3.1	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	Process to confirm identity.	An example of evidence may include, but is not limited to, documentation of the Responsible Entity’s process to confirm identity.

CIP-004-5.1 Table R3 – Personnel Risk Assessment Program			
Part	Applicable Systems	Requirements	Measures
3.2	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Process to perform a seven year criminal history records check as part of each personnel risk assessment that includes:</p> <ol style="list-style-type: none"> <li>3.2.1. current residence, regardless of duration; and</li> <li>3.2.2. other locations where, during the seven years immediately prior to the date of the criminal history records check, the subject has resided for six consecutive months or more.</li> </ol> <p>If it is not possible to perform a full seven year criminal history records check, conduct as much of the seven year criminal history records check as possible and document the reason the full seven year criminal history records check could not be performed.</p>	<p>An example of evidence may include, but is not limited to, documentation of the Responsible Entity’s process to perform a seven year criminal history records check.</p>

**CIP-004-5.1 Table R3 – Personnel Risk Assessment Program**

Part	Applicable Systems	Requirements	Measures
3.3	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Criteria or process to evaluate criminal history records checks for authorizing access.</p>	<p>An example of evidence may include, but is not limited to, documentation of the Responsible Entity’s process to evaluate criminal history records checks.</p>
3.4	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Criteria or process for verifying that personnel risk assessments performed for contractors or service vendors are conducted according to Parts 3.1 through 3.3.</p>	<p>An example of evidence may include, but is not limited to, documentation of the Responsible Entity’s criteria or process for verifying contractors or service vendors personnel risk assessments.</p>

CIP-004-5.1 Table R3 – Personnel Risk Assessment Program

Part	Applicable Systems	Requirements	Measures
3.5	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Process to ensure that individuals with authorized electronic or authorized unescorted physical access have had a personnel risk assessment completed according to Parts 3.1 to 3.4 within the last seven years.</p>	<p>An example of evidence may include, but is not limited to, documentation of the Responsible Entity’s process for ensuring that individuals with authorized electronic or authorized unescorted physical access have had a personnel risk assessment completed within the last seven years.</p>

**R4.** Each Responsible Entity shall implement, in a manner that identifies, assesses, and corrects deficiencies, one or more documented access management programs that collectively include each of the applicable requirement parts in *CIP-004-5.1 Table R4 – Access Management Program*. [Violation Risk Factor: Lower] [Time Horizon: Operations Planning and Same Day Operations].

**M4.** Evidence must include the documented processes that collectively include each of the applicable requirement parts in *CIP-004-5.1 Table R4 – Access Management Program* and additional evidence to demonstrate that the access management program was implemented as described in the Measures column of the table.



CIP-004-5.1 Table R4 – Access Management Program

Part	Applicable Systems	Requirements	Measures
4.1	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Process to authorize based on need, as determined by the Responsible Entity, except for CIP Exceptional Circumstances:</p> <ol style="list-style-type: none"> <li>4.1.1. Electronic access;</li> <li>4.1.2. Unescorted physical access into a Physical Security Perimeter; and</li> <li>4.1.3. Access to designated storage locations, whether physical or electronic, for BES Cyber System Information.</li> </ol>	<p>An example of evidence may include, but is not limited to, dated documentation of the process to authorize electronic access, unescorted physical access in a Physical Security Perimeter, and access to designated storage locations, whether physical or electronic, for BES Cyber System Information.</p>

CIP-004-5.1 Table R4 – Access Management Program

Part	Applicable Systems	Requirements	Measures
4.2	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Verify at least once each calendar quarter that individuals with active electronic access or unescorted physical access have authorization records.</p>	<p>Examples of evidence may include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Dated documentation of the verification between the system generated list of individuals who have been authorized for access (i.e., workflow database) and a system generated list of personnel who have access (i.e., user account listing), or</li> <li>• Dated documentation of the verification between a list of individuals who have been authorized for access (i.e., authorization forms) and a list of individuals provisioned for access (i.e., provisioning forms or shared account listing).</li> </ul>

CIP-004-5.1 Table R4 – Access Management Program

Part	Applicable Systems	Requirements	Measures
4.3	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>For electronic access, verify at least once every 15 calendar months that all user accounts, user account groups, or user role categories, and their specific, associated privileges are correct and are those that the Responsible Entity determines are necessary.</p>	<p>An example of evidence may include, but is not limited to, documentation of the review that includes all of the following:</p> <ol style="list-style-type: none"> <li>1. A dated listing of all accounts/account groups or roles within the system;</li> <li>2. A summary description of privileges associated with each group or role;</li> <li>3. Accounts assigned to the group or role; and</li> <li>4. Dated evidence showing verification of the privileges for the group are authorized and appropriate to the work function performed by people assigned to each account.</li> </ol>

CIP-004-5.1 Table R4 – Access Management Program

Part	Applicable Systems	Requirements	Measures
4.4	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>Verify at least once every 15 calendar months that access to the designated storage locations for BES Cyber System Information, whether physical or electronic, are correct and are those that the Responsible Entity determines are necessary for performing assigned work functions.</p>	<p>An example of evidence may include, but is not limited to, the documentation of the review that includes all of the following:</p> <ol style="list-style-type: none"> <li>1. A dated listing of authorizations for BES Cyber System information;</li> <li>2. Any privileges associated with the authorizations; and</li> <li>3. Dated evidence showing a verification of the authorizations and any privileges were confirmed correct and the minimum necessary for performing assigned work functions.</li> </ol>

- R5.** Each Responsible Entity shall implement, in a manner that identifies, assesses, and corrects deficiencies, one or more documented access revocation programs that collectively include each of the applicable requirement parts in *CIP-004-5.1 Table R5 – Access Revocation*. [Violation Risk Factor: Medium] [Time Horizon: Same Day Operations and Operations Planning].
- M5.** Evidence must include each of the applicable documented programs that collectively include each of the applicable requirement parts in *CIP-004-5.1 Table R5 – Access Revocation* and additional evidence to demonstrate implementation as described in the Measures column of the table.

CIP-004-5.1 Table R5 – Access Revocation			
Part	Applicable Systems	Requirements	Measures
5.1	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>A process to initiate removal of an individual’s ability for unescorted physical access and Interactive Remote Access upon a termination action, and complete the removals within 24 hours of the termination action (Removal of the ability for access may be different than deletion, disabling, revocation, or removal of all access rights).</p>	<p>An example of evidence may include, but is not limited to, documentation of all of the following:</p> <ol style="list-style-type: none"> <li>1. Dated workflow or sign-off form verifying access removal associated with the termination action; and</li> <li>2. Logs or other demonstration showing such persons no longer have access.</li> </ol>

CIP-004-5.1 Table R5 – Access Revocation			
Part	Applicable Systems	Requirements	Measures
5.2	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>For reassignments or transfers, revoke the individual’s authorized electronic access to individual accounts and authorized unescorted physical access that the Responsible Entity determines are not necessary by the end of the next calendar day following the date that the Responsible Entity determines that the individual no longer requires retention of that access.</p>	<p>An example of evidence may include, but is not limited to, documentation of all of the following:</p> <ol style="list-style-type: none"> <li>1. Dated workflow or sign-off form showing a review of logical and physical access; and</li> <li>2. Logs or other demonstration showing such persons no longer have access that the Responsible Entity determines is not necessary.</li> </ol>

CIP-004-5.1 Table R5 – Access Revocation			
Part	Applicable Systems	Requirements	Measures
5.3	<p>High Impact BES Cyber Systems and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol> <p>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:</p> <ol style="list-style-type: none"> <li>1. EACMS; and</li> <li>2. PACS</li> </ol>	<p>For termination actions, revoke the individual’s access to the designated storage locations for BES Cyber System Information, whether physical or electronic (unless already revoked according to Requirement R5.1), by the end of the next calendar day following the effective date of the termination action.</p>	<p>An example of evidence may include, but is not limited to, workflow or sign-off form verifying access removal to designated physical areas or cyber systems containing BES Cyber System Information associated with the terminations and dated within the next calendar day of the termination action.</p>

CIP-004-5.1 Table R5 – Access Revocation			
Part	Applicable Systems	Requirements	Measures
5.4	High Impact BES Cyber Systems and their associated: <ul style="list-style-type: none"> <li>EACMS</li> </ul>	For termination actions, revoke the individual’s non-shared user accounts (unless already revoked according to Parts 5.1 or 5.3) within 30 calendar days of the effective date of the termination action.	An example of evidence may include, but is not limited to, workflow or sign-off form showing access removal for any individual BES Cyber Assets and software applications as determined necessary to completing the revocation of access and dated within thirty calendar days of the termination actions.



CIP-004-5.1 Table R5 – Access Revocation			
Part	Applicable Systems	Requirements	Measures
5.5	<p>High Impact BES Cyber Systems and their associated:</p> <ul style="list-style-type: none"> <li>EACMS</li> </ul>	<p>For termination actions, change passwords for shared account(s) known to the user within 30 calendar days of the termination action. For reassignments or transfers, change passwords for shared account(s) known to the user within 30 calendar days following the date that the Responsible Entity determines that the individual no longer requires retention of that access.</p> <p>If the Responsible Entity determines and documents that extenuating operating circumstances require a longer time period, change the password(s) within 10 calendar days following the end of the operating circumstances.</p>	<p>Examples of evidence may include, but are not limited to:</p> <ul style="list-style-type: none"> <li>Workflow or sign-off form showing password reset within 30 calendar days of the termination;</li> <li>Workflow or sign-off form showing password reset within 30 calendar days of the reassignments or transfers; or</li> <li>Documentation of the extenuating operating circumstance and workflow or sign-off form showing password reset within 10 calendar days following the end of the operating circumstance.</li> </ul>

## C. Compliance

### 1. Compliance Monitoring Process:

#### 1.1. Compliance Enforcement Authority:

The Regional Entity shall serve as the Compliance Enforcement Authority (“CEA”) unless the applicable entity is owned, operated, or controlled by the Regional Entity. In such cases the ERO or a Regional Entity approved by FERC or other applicable governmental authority shall serve as the CEA.

#### 1.2. Evidence Retention:

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the CEA may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Responsible Entity shall keep data or evidence to show compliance as identified below unless directed by its CEA to retain specific evidence for a longer period of time as part of an investigation:

- Each Responsible Entity shall retain evidence of each requirement in this standard for three calendar years.
- If a Responsible Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time specified above, whichever is longer.
- The CEA shall keep the last audit records and all requested and submitted subsequent audit records.

#### 1.3. Compliance Monitoring and Assessment Processes:

- Compliance Audit
- Self-Certification
- Spot Checking
- Compliance Investigation
- Self-Reporting
- Complaint

#### 1.4. Additional Compliance Information:

- None

2. Table of Compliance Elements

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Operations Planning	Lower	The Responsible Entity did not reinforce cyber security practices during a calendar quarter but did so less than 10 calendar days after the start of a subsequent calendar quarter. (1.1)	The Responsible Entity did not reinforce cyber security practices during a calendar quarter but did so between 10 and 30 calendar days after the start of a subsequent calendar quarter. (1.1)	The Responsible Entity did not reinforce cyber security practices during a calendar quarter but did so within the subsequent quarter but beyond 30 calendar days after the start of that calendar quarter. (1.1)	The Responsible Entity did not document or implement any security awareness process(es) to reinforce cyber security practices. (R1)  OR  The Responsible Entity did not reinforce cyber security practices and associated physical security practices for at least two consecutive calendar quarters. (1.1)
R2	Operations Planning	Lower	The Responsible Entity implemented a cyber security training program but failed to include one of the training	The Responsible Entity implemented a cyber security training program but failed to include two of the training content topics in Requirement Parts 2.1.1 through 2.1.9, and did not identify, assess and correct the	The Responsible Entity implemented a cyber security training program but failed to include three of the training content topics in Requirement Parts 2.1.1 through 2.1.9, and did not identify, assess and correct the	The Responsible Entity did not implement a cyber security training program appropriate to individual roles, functions, or responsibilities. (R2)  OR  The Responsible Entity

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			<p>content topics in Requirement Parts 2.1.1 through 2.1.9, and did not identify, assess and correct the deficiencies. (2.1)</p> <p>OR</p> <p>The Responsible Entity implemented a cyber security training program but failed to train one individual (with the exception of CIP Exceptional Circumstances) prior to their being granted authorized electronic and authorized</p>	<p>deficiencies. (2.1)</p> <p>OR</p> <p>The Responsible Entity implemented a cyber security training program but failed to train two individuals (with the exception of CIP Exceptional Circumstances) prior to their being granted authorized electronic and authorized unescorted physical access, and did not identify, assess and correct the deficiencies. (2.2)</p> <p>OR</p> <p>The Responsible Entity implemented a cyber security training program but failed to train two individuals with authorized electronic or authorized unescorted physical</p>	<p>deficiencies. (2.1)</p> <p>OR</p> <p>The Responsible Entity implemented a cyber security training program but failed to train three individuals (with the exception of CIP Exceptional Circumstances) prior to their being granted authorized electronic and authorized unescorted physical access, and did not identify, assess and correct the deficiencies. (2.2)</p> <p>OR</p> <p>The Responsible Entity implemented a cyber security training program but failed to train three individuals with authorized electronic or authorized unescorted physical</p>	<p>implemented a cyber security training program but failed to include four or more of the training content topics in Requirement Parts 2.1.1 through 2.1.9, and did not identify, assess and correct the deficiencies. (2.1)</p> <p>OR</p> <p>The Responsible Entity implemented a cyber security training program but failed to train four or more individuals (with the exception of CIP Exceptional Circumstances) prior to their being granted authorized electronic and authorized unescorted physical access, and did not identify, assess and correct the deficiencies.</p>

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			<p>unescorted physical access, and did not identify, assess and correct the deficiencies. (2.2)</p> <p>OR</p> <p>The Responsible Entity implemented a cyber security training program but failed to train one individual with authorized electronic or authorized unescorted physical access within 15 calendar months of the previous training completion</p>	<p>access within 15 calendar months of the previous training completion date, and did not identify, assess and correct the deficiencies. (2.3)</p>	<p>access within 15 calendar months of the previous training completion date, and did not identify, assess and correct the deficiencies. (2.3)</p>	<p>(2.2)</p> <p>OR</p> <p>The Responsible Entity implemented a cyber security training program but failed to train four or more individuals with authorized electronic or authorized unescorted physical access within 15 calendar months of the previous training completion date, and did not identify, assess and correct the deficiencies. (2.3)</p>

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			date, and did not identify, assess and correct the deficiencies. (2.3)			
<b>R3</b>	<b>Operations Planning</b>	<b>Medium</b>	<p>The Responsible Entity has a program for conducting Personnel Risk Assessments (PRAs) for individuals, including contractors and service vendors, but did not conduct the PRA as a condition of granting authorized electronic or authorized unescorted physical access</p>	<p>The Responsible Entity has a program for conducting Personnel Risk Assessments (PRAs) for individuals, including contractors and service vendors, but did not conduct the PRA as a condition of granting authorized electronic or authorized unescorted physical access for two individuals, and did not identify, assess, and correct the deficiencies. (R3)</p> <p>OR</p> <p>The Responsible Entity did conduct Personnel Risk Assessments (PRAs) for individuals, including</p>	<p>The Responsible Entity has a program for conducting Personnel Risk Assessments (PRAs) for individuals, including contractors and service vendors, but did not conduct the PRA as a condition of granting authorized electronic or authorized unescorted physical access for three individuals, and did not identify, assess, and correct the deficiencies. (R3)</p> <p>OR</p> <p>The Responsible Entity did conduct Personnel Risk Assessments (PRAs) for individuals, including</p>	<p>The Responsible Entity did not have all of the required elements as described by 3.1 through 3.4 included within documented program(s) for implementing Personnel Risk Assessments (PRAs), for individuals, including contractors and service vendors, for obtaining and retaining authorized cyber or authorized unescorted physical access. (R3)</p> <p>OR</p> <p>The Responsible Entity has a program for conducting Personnel Risk Assessments (PRAs)</p>

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			for one individual, and did not identify, assess, and correct the deficiencies. (R3) OR The Responsible Entity did conduct Personnel Risk Assessments (PRAs) for individuals, including contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not confirm identity for one	contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not confirm identity for two individuals, and did not identify, assess, and correct the deficiencies. (3.1 & 3.4) OR The Responsible Entity has a process to perform seven-year criminal history record checks for individuals, including contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not include the required checks described in 3.2.1 and 3.2.2 for two individuals, and did not identify, assess, and correct the deficiencies.	contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not confirm identity for three individuals, and did not identify, assess, and correct the deficiencies. (3.1 & 3.4) OR The Responsible Entity has a process to perform seven-year criminal history record checks for individuals, including contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not include the required checks described in 3.2.1 and 3.2.2 for three individuals, and did not identify, assess, and correct the deficiencies.	for individuals, including contractors and service vendors, but did not conduct the PRA as a condition of granting authorized electronic or authorized unescorted physical access for four or more individuals, and did not identify, assess, and correct the deficiencies. (R3) OR The Responsible Entity did conduct Personnel Risk Assessments (PRAs) for individuals, including contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not confirm identity for four or more individuals, and did not identify, assess, and correct the deficiencies. (3.1 & 3.4)

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			individual, and did not identify, assess, and correct the deficiencies. (3.1 & 3.4) OR The Responsible Entity has a process to perform seven-year criminal history record checks for individuals, including contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not include the required	(3.2 & 3.4) OR The Responsible Entity did conduct Personnel Risk Assessments (PRAs) for individuals, including contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not evaluate criminal history records check for access authorization for two individuals, and did not identify, assess, and correct the deficiencies. (3.3 & 3.4) OR The Responsible Entity did not conduct Personnel Risk Assessments (PRAs) for two individuals with authorized electronic or authorized unescorted physical access within 7	(3.2 & 3.4) OR The Responsible Entity did conduct Personnel Risk Assessments (PRAs) for individuals, including contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not evaluate criminal history records check for access authorization for three individuals, and did not identify, assess, and correct the deficiencies. (3.3 & 3.4) OR The Responsible Entity did not conduct Personnel Risk Assessments (PRAs) for three individuals with authorized electronic or authorized unescorted physical access within 7	OR The Responsible Entity has a process to perform seven-year criminal history record checks for individuals, including contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not include the required checks described in 3.2.1 and 3.2.2 for four or more individuals, and did not identify, assess, and correct the deficiencies. (3.2 & 3.4) OR The Responsible Entity did conduct Personnel Risk Assessments (PRAs) for individuals, including contractors and service vendors, with authorized electronic or



R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			<p>checks described in 3.2.1 and 3.2.2 for one individual, and did not identify, assess, and correct the deficiencies. (3.2 &amp; 3.4)</p> <p>OR</p> <p>The Responsible Entity did conduct Personnel Risk Assessments (PRAs) for individuals, including contractors and service vendors, with authorized electronic or authorized unescorted physical access</p>	<p>calendar years of the previous PRA completion date, and did not identify, assess, and correct the deficiencies. (3.5)</p>	<p>calendar years of the previous PRA completion date, and did not identify, assess, and correct the deficiencies. (3.5)</p>	<p>authorized unescorted physical access but did not evaluate criminal history records check for access authorization for four or more individuals, and did not identify, assess, and correct the deficiencies. (3.3 &amp; 3.4)</p> <p>OR</p> <p>The Responsible Entity did not conduct Personnel Risk Assessments (PRAs) for four or more individuals with authorized electronic or authorized unescorted physical access within 7 calendar years of the previous PRA completion date and has identified deficiencies, and did not identify, assess, and correct the deficiencies. (3.5)</p>

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			but did not evaluate criminal history records check for access authorization for one individual, and did not identify, assess, and correct the deficiencies. (3.3 & 3.4) OR The Responsible Entity did not conduct Personnel Risk Assessments (PRAs) for one individual with authorized electronic or authorized unescorted physical access within 7			

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			calendar years of the previous PRA completion date, and did not identify, assess, and correct the deficiencies. (3.5)			
<b>R4</b>	<b>Operations Planning and Same Day Operations</b>	<b>Lower</b>	The Responsible Entity did not verify that individuals with active electronic or active unescorted physical access have authorization records during a calendar quarter but did so less than 10 calendar days after the start	The Responsible Entity did not verify that individuals with active electronic or active unescorted physical access have authorization records during a calendar quarter but did so between 10 and <del>2030</del> calendar days after the start of a subsequent calendar quarter, and did not identify, assess, and correct the deficiencies. (4.2)  OR	The Responsible Entity did not verify that individuals with active electronic or active unescorted physical access have authorization records during a calendar quarter but did so between <del>2010</del> and 30 calendar days after the start of a subsequent calendar quarter, and did not identify, assess, and correct the deficiencies. (4.2)  OR	The Responsible Entity did not implement any documented program(s) for access management. (R4)  OR The Responsible Entity has implemented one or more documented program(s) for access management that includes a process to authorize electronic access, unescorted physical access, or access to the designated storage locations where

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			<p>of a subsequent calendar quarter, and did not identify, assess and correct the deficiencies. (4.2)</p> <p>OR</p> <p>The Responsible Entity has implemented processes to verify that user accounts, user account groups, or user role categories, and their specific, associated privileges are correct and necessary within 15</p>	<p>The Responsible Entity has implemented processes to verify that user accounts, user account groups, or user role categories, and their specific, associated privileges are correct and necessary within 15 calendar months of the previous verification but for two BES Cyber Systems, privileges were incorrect or unnecessary, and did not identify, assess, and correct the deficiencies. (4.3)</p> <p>OR</p> <p>The Responsible Entity has implemented processes to verify that access to the designated storage locations for BES Cyber System Information is correct and necessary within 15</p>	<p>The Responsible Entity has implemented processes to verify that user accounts, user account groups, or user role categories, and their specific, associated privileges are correct and necessary within 15 calendar months of the previous verification but for three BES Cyber Systems, privileges were incorrect or unnecessary, and did not identify, assess, and correct the deficiencies. (4.3)</p> <p>OR</p> <p>The Responsible Entity has implemented processes to verify that access to the designated storage locations for BES Cyber System Information is correct and necessary within 15</p>	<p>BES Cyber System Information is located, and did not identify, assess, and correct the deficiencies. (4.1)</p> <p>OR</p> <p>The Responsible Entity did not verify that individuals with active electronic or active unescorted physical access have authorization records for at least two consecutive calendar quarters, and did not identify, assess, and correct the deficiencies. (4.2)</p> <p>OR</p> <p>The Responsible Entity has implemented processes to verify that user accounts, user account groups, or user role categories, and their specific, associated</p>

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			calendar months of the previous verification but for one BES Cyber System, privileges were incorrect or unnecessary, and did not identify, assess and correct the deficiencies. (4.3) OR The Responsible Entity has implemented processes to verify that access to the designated storage locations for BES Cyber System Information is	calendar months of the previous verification but for two BES Cyber System Information storage locations, privileges were incorrect or unnecessary, and did not identify, assess, and correct the deficiencies. (4.4)	calendar months of the previous verification but for three BES Cyber System Information storage locations, privileges were incorrect or unnecessary, and did not identify, assess, and correct the deficiencies. (4.4)	privileges are correct and necessary within 15 calendar months of the previous verification but for four or more BES Cyber Systems, privileges were incorrect or unnecessary, and did not identify, assess, and correct the deficiencies. (4.3) OR The Responsible Entity has implemented processes to verify that access to the designated storage locations for BES Cyber System Information is correct and necessary within 15 calendar months of the previous verification but for four or more BES Cyber System Information storage locations, privileges

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			correct and necessary within 15 calendar months of the previous verification but for one BES Cyber System Information storage location, privileges were incorrect or unnecessary, and did not identify, assess and correct the deficiencies. (4.4)			were incorrect or unnecessary, and did not identify, assess, and correct the deficiencies. (4.4)
<b>R5</b>	<b>Same Day Operations and Operations Planning</b>	<b>Medium</b>	The Responsible Entity has implemented one or more process(es) to revoke the individual's	The Responsible Entity has implemented one or more process(es) to remove the ability for unescorted physical access and Interactive Remote Access upon a termination action or	The Responsible Entity has implemented one or more process(es) to remove the ability for unescorted physical access and Interactive Remote Access upon a termination action or	The Responsible Entity has not implemented any documented program(s) for access revocation for electronic access, unescorted physical access, or BES Cyber System

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			<p>access to the designated storage locations for BES Cyber System Information but, for one individual, did not do so by the end of the next calendar day following the effective date and time of the termination action, and did not identify, assess, and correct the deficiencies. (5.3)</p> <p>OR</p> <p>The Responsible Entity has implemented</p>	<p>complete the removal within 24 hours of the termination action but did not initiate those removals for one individual, and did not identify, assess, and correct the deficiencies. (5.1)</p> <p>OR</p> <p>The Responsible Entity has implemented one or more process(es) to determine that an individual no longer requires retention of access following reassignments or transfers but, for one individual, did not revoke the authorized electronic access to individual accounts and authorized unescorted physical access by the end of the next calendar</p>	<p>complete the removal within 24 hours of the termination action but did not initiate those removals for two individuals, and did not identify, assess, and correct the deficiencies. (5.1)</p> <p>OR</p> <p>The Responsible Entity has implemented one or more process(es) to determine that an individual no longer requires retention of access following reassignments or transfers but, for two individuals, did not revoke the authorized electronic access to individual accounts and authorized unescorted physical access by the end of the next calendar</p>	<p>Information storage locations. (R5)</p> <p>OR</p> <p>The Responsible Entity has implemented one or more process(es) to remove the ability for unescorted physical access and Interactive Remote Access upon a termination action or complete the removal within 24 hours of the termination action but did not initiate those removals for three or more individuals, and did not identify, assess, and correct the deficiencies. (5.1)</p> <p>OR</p> <p>The Responsible Entity has implemented one or more process(es) to determine that an individual no longer</p>

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			<p>one or more process(es) to revoke the individual’s user accounts upon termination action but did not do so for within 30 calendar days of the date of termination action for one or more individuals, and did not identify, assess, and correct the deficiencies. (5.4)</p> <p>OR</p> <p>The Responsible Entity has implemented one or more process(es) to</p>	<p>day following the predetermined date, and did not identify, assess, and correct the deficiencies. (5.2)</p> <p>OR</p> <p>The Responsible Entity has implemented one or more process(es) to revoke the individual’s access to the designated storage locations for BES Cyber System Information but, for two individuals, did not do so by the end of the next calendar day following the effective date and time of the termination action, and did not identify, assess, and correct the deficiencies. (5.3)</p>	<p>day following the predetermined date, and did not identify, assess, and correct the deficiencies. (5.2)</p> <p>OR</p> <p>The Responsible Entity has implemented one or more process(es) to revoke the individual’s access to the designated storage locations for BES Cyber System Information but, for three or more individuals, did not do so by the end of the next calendar day following the effective date and time of the termination action, and did not identify, assess, and correct the deficiencies. (5.3)</p>	<p>requires retention of access following reassignments or transfers but, for three or more individuals, did not revoke the authorized electronic access to individual accounts and authorized unescorted physical access by the end of the next calendar day following the predetermined date, and did not identify, assess, and correct the deficiencies. (5.2)</p>



R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			change passwords for shared accounts known to the user upon termination action, reassignment, or transfer, but did not do so for within 30 calendar days of the date of termination action, reassignment, or transfer for one or more individuals, and did not identify, assess, and correct the deficiencies. (5.5)  OR  The Responsible			

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			Entity has implemented one or more process(es) to determine and document extenuating operating circumstances following a termination action, reassignment, or transfer, but did not change one or more passwords for shared accounts known to the user within 10 calendar days following the end of the extenuating operating circumstances, and did not			

R #	Time Horizon	VRF	Violation Severity Levels (CIP-004-5.1)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			identify, assess, and correct the deficiencies. (5.5)			

**D. Regional Variances**

None.

**E. Interpretations**

None.

**F. Associated Documents**

None.

**Guidelines and Technical Basis**

**Section 4 – Scope of Applicability of the CIP Cyber Security Standards**

Section “4. Applicability” of the standards provides important information for Responsible Entities to determine the scope of the applicability of the CIP Cyber Security Requirements.

Section “4.1. Functional Entities” is a list of NERC functional entities to which the standard applies. If the entity is registered as one or more of the functional entities listed in Section 4.1, then the NERC CIP Cyber Security Standards apply. Note that there is a qualification in Section 4.1 that restricts the applicability in the case of Distribution Providers to only those that own certain types of systems and equipment listed in 4.2. Furthermore,

Section “4.2. Facilities” defines the scope of the Facilities, systems, and equipment owned by the Responsible Entity, as qualified in Section 4.1, that is subject to the requirements of the standard. As specified in the exemption section 4.2.3.5, this standard does not apply to Responsible Entities that do not have High Impact or Medium Impact BES Cyber Systems under CIP-002-5’s categorization. In addition to the set of BES Facilities, Control Centers, and other systems and equipment, the list includes the set of systems and equipment owned by Distribution Providers. While the NERC Glossary term “Facilities” already includes the BES characteristic, the additional use of the term BES here is meant to reinforce the scope of applicability of these Facilities where it is used, especially in this applicability scoping section. This in effect sets the scope of Facilities, systems, and equipment that is subject to the standards.

**Requirement R1:**

The security awareness program is intended to be an informational program, not a formal training program. It should reinforce security practices to ensure that personnel maintain awareness of best practices for both physical and electronic security to protect its BES Cyber Systems. The Responsible Entity is not required to provide records that show that each individual received or understood the information, but they must maintain documentation of the program materials utilized in the form of posters, memos, and/or presentations.

Examples of possible mechanisms and evidence, when dated, which can be used are:

- Direct communications (e.g., emails, memos, computer based training, etc.);
- Indirect communications (e.g., posters, intranet, brochures, etc.);
- Management support and reinforcement (e.g., presentations, meetings, etc.).

### **Requirement R2:**

Training shall cover the policies, access controls, and procedures as developed for the BES Cyber Systems and include, at a minimum, the required items appropriate to personnel roles and responsibilities from Table R2. The Responsible Entity has the flexibility to define the training program and it may consist of multiple modules and multiple delivery mechanisms, but a single training program for all individuals needing to be trained is acceptable. The training can focus on functions, roles or responsibilities at the discretion of the Responsible Entity.

One new element in the training content is intended to encompass networking hardware and software and other issues of electronic interconnectivity supporting the operation and control of BES Cyber Systems as per FERC Order No. 706, Paragraph 434. This is not intended to provide technical training to individuals supporting networking hardware and software, but educating system users of the cyber security risks associated with the interconnectedness of these systems. The users, based on their function, role or responsibility, should have a basic understanding of which systems can be accessed from other systems and how the actions they take can affect cyber security.

Each Responsible Entity shall ensure all personnel who are granted authorized electronic access and/or authorized unescorted physical access to its BES Cyber Systems, including contractors and service vendors, complete cyber security training prior to their being granted authorized access, except for CIP Exceptional Circumstances. To retain the authorized accesses, individuals must complete the training at least one every 15 months.

### **Requirement R3:**

Each Responsible Entity shall ensure a personnel risk assessment is performed for all personnel who are granted authorized electronic access and/or authorized unescorted physical access to its BES Cyber Systems, including contractors and service vendors, prior to their being granted authorized access, except for program specified exceptional circumstances that are approved by the single senior management official or their delegate and impact the reliability of the BES or emergency response. Identity should be confirmed in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements. Identity only needs to be confirmed prior to initially granting access and only requires periodic confirmation according to the entity's process during the tenure of employment, which may or may not be the same as the initial verification action.

A seven year criminal history check should be performed for those locations where the individual has resided for at least six consecutive months. This check should also be performed in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements. When it is not possible to perform a full seven year criminal history check, documentation must be made of what criminal history check was performed, and the reasons a full seven-year check could not be performed. Examples of this could include

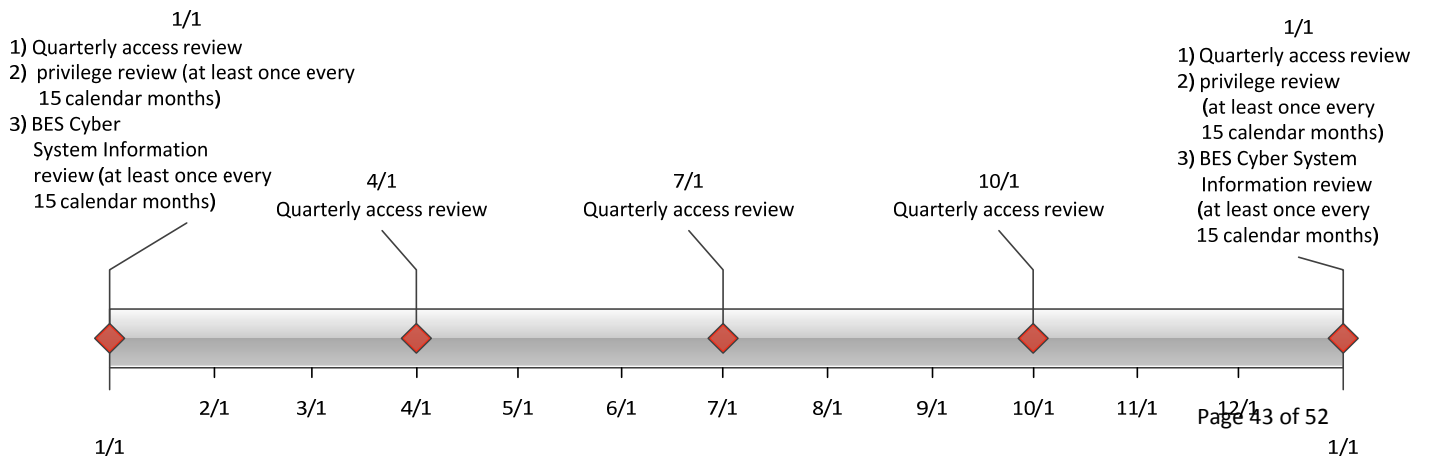
individuals under the age of 25 where a juvenile criminal history may be protected by law, individuals who may have resided in locations from where it is not possible to obtain a criminal history records check, violates the law or is not allowed under the existing collective bargaining agreement. The Responsible Entity should consider the absence of information for the full seven years when assessing the risk of granting access during the process to evaluate the criminal history check. There needs to be a personnel risk assessment that has been completed within the last seven years for each individual with access. A new criminal history records check must be performed as part of the new PRA. Individuals who have been granted access under a previous version of these standards need a new PRA within seven years of the date of their last PRA. The clarifications around the seven year criminal history check in this version do not require a new PRA be performed by the implementation date.

**Requirement R4:**

Authorization for electronic and unescorted physical access and access to BES Cyber System Information must be on the basis of necessity in the individual performing a work function. Documentation showing the authorization should have some justification of the business need included. To ensure proper segregation of duties, access authorization and provisioning should not be performed by the same person where possible.

This requirement specifies both quarterly reviews and reviews at least once every 15 calendar months. Quarterly reviews are to perform a validation that only authorized users have been granted access to BES Cyber Systems. This is achieved by comparing individuals actually provisioned to a BES Cyber System against records of individuals authorized to the BES Cyber System. The focus of this requirement is on the integrity of provisioning access rather than individual accounts on all BES Cyber Assets. The list of provisioned individuals can be an automatically generated account listing. However, in a BES Cyber System with several account databases, the list of provisioned individuals may come from other records such as provisioning workflow or a user account database where provisioning typically initiates.

The privilege review at least once every 15 calendar months is more detailed to ensure an individual’s associated privileges are the minimum necessary to perform their work function (i.e., least privilege). Entities can more efficiently perform this review by implementing role-based access. This involves determining the specific roles on the system (e.g., system operator, technician, report viewer, administrator, etc.) then grouping access privileges to the role and assigning users to the role. Role-based access does not assume any specific software and can be implemented by defining specific provisioning processes for each role where access group



assignments cannot be performed. Role-based access permissions eliminate the need to perform the privilege review on individual accounts. An example timeline of all the reviews in Requirement R4 is included below.

Separation of duties should be considered when performing the reviews in Requirement R4. The person reviewing should be different than the person provisioning access.

If the results of quarterly or at least once every 15 calendar months account reviews indicate an administrative or clerical error in which access was not actually provisioned, then the SDT intends that this error should not be considered a violation of this requirement.

For BES Cyber Systems that do not have user accounts defined, the controls listed in Requirement R4 are not applicable. However, the Responsible Entity should document such configurations.

**Requirement R5:**

The requirement to revoke access at the time of the termination action includes procedures showing revocation of access concurrent with the termination action. This requirement recognizes that the timing of the termination action may vary depending on the circumstance. Some common scenarios and possible processes on when the termination action occurs are provided in the following table. These scenarios are not an exhaustive list of all scenarios, but are representative of several routine business practices.

Scenario	Possible Process
Immediate involuntary termination	Human resources or corporate security escorts the individual off site and the supervisor or human resources personnel notify the appropriate personnel to begin the revocation process.
Scheduled involuntary termination	Human resources personnel are notified of the termination and work with appropriate personnel to schedule the revocation of access at the time of termination.
Voluntary termination	Human resources personnel are notified of the termination and work with appropriate personnel to schedule the revocation of access at the time of termination.
Retirement where the last working day is several weeks prior to the termination date	Human resources personnel coordinate with manager to determine the final date access is no longer needed and schedule the revocation of access on the determined day.
Death	Human resources personnel are notified of the death and work with appropriate personnel to begin the revocation process.

Revocation of electronic access should be understood to mean a process with the end result that electronic access to BES Cyber Systems is no longer possible using credentials assigned to or known by the individual(s) whose access privileges are being revoked. Steps taken to accomplish this outcome may include deletion or deactivation of accounts used by the individual(s), but no specific actions are prescribed. Entities should consider the ramifications of deleting an account may include incomplete event log entries due to an unrecognized account or system services using the account to log on.

The initial revocation required in Requirement R5.1 includes unescorted physical access and Interactive Remote Access. These two actions should prevent any further access by the individual after termination. If an individual still has local access accounts (i.e., accounts on the Cyber Asset itself) on BES Cyber Assets, then the Responsible Entity has 30 days to complete the revocation process for those accounts. However, nothing prevents a Responsible Entity from performing all of the access revocation at the time of termination.

For transferred or reassigned individuals, a review of access privileges should be performed. This review could entail a simple listing of all authorizations for an individual and working with the respective managers to determine which access will still be needed in the new position. For instances in which the individual still needs to retain access as part of a transitory period, the entity should schedule a time to review these access privileges or include the privileges in the quarterly account review or annual privilege review.

Revocation of access to shared accounts is called out separately to prevent the situation where passwords on substation and generation devices are constantly changed due to staff turnover.

Requirement 5.5 specified that passwords for shared account are to be changed within 30 calendar days of the termination action or when the Responsible Entity determines an individual no longer requires access to the account as a result of a reassignment or transfer. The 30 days applies under normal operating conditions. However, circumstances may occur where this is not possible. Some systems may require an outage or reboot of the system in order to complete the password change. In periods of extreme heat or cold, many Responsible Entities may prohibit system outages and reboots in order to maintain reliability of the BES. When these circumstances occur, the Responsible Entity must document these circumstances and prepare to change the password within 10 calendar days following the end of the operating circumstances. Records of activities must be retained to show that the Responsible Entity followed the plan they created.



## **Rationale:**

During the development of this standard, references to prior versions of the CIP standards and rationale for the requirements and their parts were embedded within the standard. Upon BOT approval, that information was moved to this section.

### **Rationale for R1:**

Ensures that Responsible Entities with personnel who have authorized electronic or authorized unescorted physical access to BES Cyber Assets take action so that those personnel with such authorized electronic or authorized unescorted physical access maintain awareness of the Responsible Entity's security practices.

**Summary of Changes:** Reformatted into table structure.

**Reference to prior version:** (Part 1.1) CIP-004-4, R1

**Change Rationale:** (Part 1.1)

*Changed to remove the need to ensure or prove everyone with authorized electronic or authorized unescorted physical access "received" ongoing reinforcement – to state that security awareness has been reinforced.*

*Moved example mechanisms to guidance.*

### **Rationale for R2:**

To ensure that the Responsible Entity's training program for personnel who need authorized electronic access and/or authorized unescorted physical access to BES Cyber Systems covers the proper policies, access controls, and procedures to protect BES Cyber Systems and are trained before access is authorized.

Based on their role, some personnel may not require training on all topics.

### **Summary of Changes:**

1. Addition of specific role training for:

- The visitor control program
- Electronic interconnectivity supporting the operation and control of BES Cyber Systems
- Storage media as part of the handling of BES Cyber Systems information

2. Change references from Critical Cyber Assets to BES Cyber Systems.

**Reference to prior version:** (Part 2.1) CIP004-4, R2.2.1

**Change Rationale:** (Part 2.1)

*Removed "proper use of Critical Cyber Assets" concept from previous versions to focus the requirement on cyber security issues, not the business function. The previous version was*

*focused more on the business or functional use of the BES Cyber System and is outside the scope of cyber security. Personnel who will administer the visitor control process or serve as escorts for visitors need training on the program. Core training on the handling of BES Cyber System (not Critical Cyber Assets) Information, with the addition of storage; FERC Order No. 706, paragraph 413 and paragraphs 632-634, 688, 732-734; DHS 2.4.16. Core training on the identification and reporting of a Cyber Security Incident; FERC Order No. 706, Paragraph 413; Related to CIP-008-5 & DHS Incident Reporting requirements for those with roles in incident reporting. Core training on the action plans and procedures to recover or re-establish BES Cyber Systems for personnel having a role in the recovery; FERC Order No. 706, Paragraph 413. Core training programs are intended to encompass networking hardware and software and other issues of electronic interconnectivity supporting the operation and control of BES Cyber Systems; FERC Order No. 706, Paragraph 434.*

**Reference to prior version:** (Part 2.2) CIP004-4, R2.1

**Change Rationale:** (Part 2.2)

*Addition of exceptional circumstances parameters as directed in FERC Order No. 706, Paragraph 431 is detailed in CIP-003-5.*

**Reference to prior version:** (Part 2.3) CIP004-4, R2.3

**Change Rationale:** (Part 2.3)

*Updated to replace “annually” with “once every 15 calendar months.”*

### **Rationale for R3:**

To ensure that individuals who need authorized electronic or authorized unescorted physical access to BES Cyber Systems have been assessed for risk. Whether initial access or maintaining access, those with access must have had a personnel risk assessment completed within the last 7 years.

**Summary of Changes:** Specify that the seven year criminal history check covers all locations where the individual has resided for six consecutive months or more, including current residence regardless of duration.

**Reference to prior version:** (Part 3.1) CIP004-4, R3.1

**Change Rationale:** (Part 3.1)

*Addressed interpretation request in guidance. Specified that process for identity confirmation is required. The implementation plan clarifies that a documented identity verification conducted under an earlier version of the CIP standards is sufficient.*

**Reference to prior version:** (Part 3.2) CIP004-4, R3.1

**Change Rationale:** (Part 3.2)

*Specify that the seven year criminal history check covers all locations where the individual has resided for six months or more, including current residence regardless of duration. Added*

*additional wording based on interpretation request. Provision is made for when a full seven-year check cannot be performed.*

**Reference to prior version:** (Part 3.3) New

**Change Rationale:** (Part 3.3)

*There should be documented criteria or a process used to evaluate criminal history records checks for authorizing access.*

**Reference to prior version:** (Part 3.4) CIP-004-4, R3.3

**Change Rationale:** (Part 3.4)

*Separated into its own table item.*

**Reference to prior version:** (Part 3.5) CIP-004-3, R3, R3.3

**Change Rationale:** (Part 3.5)

*Whether for initial access or maintaining access, establishes that those with access must have had PRA completed within 7 years. This covers both initial and renewal. The implementation plan specifies that initial performance of this requirement is 7 years after the last personnel risk assessment that was performed pursuant to a previous version of the CIP Cyber Security Standards for a personnel risk assessment. CIP-004-3, R3, R3.3*

#### **Rationale for R4:**

To ensure that individuals with access to BES Cyber Systems and the physical and electronic locations where BES Cyber System Information is stored by the Responsible Entity have been properly authorized for such access. "Authorization" should be considered to be a grant of permission by a person or persons empowered by the Responsible Entity to perform such grants and included in the delegations referenced in CIP-003-5. "Provisioning" should be considered the actions to provide access to an individual.

Access is physical, logical, and remote permissions granted to Cyber Assets composing the BES Cyber System or allowing access to the BES Cyber System. When granting, reviewing, or revoking access, the Responsible Entity must address the Cyber Asset specifically as well as the systems used to enable such access (i.e., physical access control system, remote access system, directory services).

CIP Exceptional Circumstances are defined in a Responsible Entity's policy from CIP-003-5 and allow an exception to the requirement for authorization to BES Cyber Systems and BES Cyber System Information.

Quarterly reviews in Part 4.5 are to perform a validation that only authorized users have been granted access to BES Cyber Systems. This is achieved by comparing individuals actually provisioned to a BES Cyber System against records of individuals authorized to access the BES Cyber System. The focus of this requirement is on the integrity of provisioning access rather than individual accounts on all BES Cyber Assets. The list of provisioned individuals can be an automatically generated account listing. However, in a BES Cyber System with several account

databases, the list of provisioned individuals may come from other records such as provisioning workflow or a user account database where provisioning typically initiates.

If the results of quarterly or annual account reviews indicate an administrative or clerical error in which access was not actually provisioned, then the SDT intends that the error should not be considered a violation of this requirement.

For BES Cyber Systems that do not have user accounts defined, the controls listed in Requirement R4 are not applicable. However, the Responsible Entity should document such configurations.

**Summary of Changes:** The primary change was in pulling the access management requirements from CIP-003-4, CIP-004-4, and CIP-007-4 into a single requirement. The requirements from Version 4 remain largely unchanged except to clarify some terminology. The purpose for combining these requirements is to remove the perceived redundancy in authorization and review. The requirement in CIP-004-4 R4 to maintain a list of authorized personnel has been removed because the list represents only one form of evidence to demonstrate compliance that only authorized persons have access.

**Reference to prior version:** (Part 4.1) CIP 003-4, R5.1 and R5.2; CIP-006-4, R1.5 and R4; CIP-007-4, R5.1 and R5.1.1

**Change Rationale:** (Part 4.1)

Combined requirements from CIP-003-4, CIP-007-4, and CIP-006-4 to make the authorization process clear and consistent. *CIP-003-4, CIP-004-4, CIP-006-4, and CIP-007-4 all reference authorization of access in some form, and CIP-003-4 and CIP-007-4 require authorization on a “need to know” basis or with respect to work functions performed. These were consolidated to ensure consistency in the requirement language.*

**Reference to prior version:** (Part 4.2) CIP 004-4, R4.1

**Change Rationale:** (Part 4.2)

*Feedback among team members, observers, and regional CIP auditors indicates there has been confusion in implementation around what the term “review” entailed in CIP-004-4, Requirement R4.1. This requirement clarifies the review should occur between the provisioned access and authorized access.*

**Reference to prior version:** (Part 4.3) CIP 007-4, R5.1.3

**Change Rationale:** (Part 4.3)

*Moved requirements to ensure consistency and eliminate the cross-referencing of requirements. Clarified what was necessary in performing verification by stating the objective was to confirm that access privileges are correct and the minimum necessary.*

**Reference to prior version:** (Part 4.4) CIP-003-4, R5.1.2

**Change Rationale:** (Part 4.4)

*Moved requirement to ensure consistency among access reviews. Clarified precise meaning of annual. Clarified what was necessary in performing a verification by stating the objective was to*

*confirm access privileges are correct and the minimum necessary for performing assigned work functions.*

**Rationale for R5:**

The timely revocation of electronic access to BES Cyber Systems is an essential element of an access management regime. When an individual no longer requires access to a BES Cyber System to perform his or her assigned functions, that access should be revoked. This is of particular importance in situations where a change of assignment or employment is involuntary, as there is a risk the individual(s) involved will react in a hostile or destructive manner.

In considering how to address directives in FERC Order No. 706 directing “immediate” revocation of access for involuntary separation, the SDT chose not to specify hourly time parameters in the requirement (e.g., revoking access within 1 hour). The point in time at which an organization terminates a person cannot generally be determined down to the hour. However, most organizations have formal termination processes, and the timeliest revocation of access occurs in concurrence with the initial processes of termination.

Access is physical, logical, and remote permissions granted to Cyber Assets composing the BES Cyber System or allowing access to the BES Cyber System. When granting, reviewing, or revoking access, the Responsible Entity must address the Cyber Asset specifically as well as the systems used to enable such access (e.g., physical access control system, remote access system, directory services).

**Summary of Changes:** FERC Order No. 706, Paragraphs 460 and 461, state the following: “The Commission adopts the CIP NOPR proposal to direct the ERO to develop modifications to CIP-004-1 to require immediate revocation of access privileges when an employee, contractor or vendor no longer performs a function that requires physical or electronic access to a Critical Cyber Asset for any reason (including disciplinary action, transfer, retirement, or termination).

As a general matter, the Commission believes that revoking access when an employee no longer needs it, either because of a change in job or the end of employment, must be immediate.”

**Reference to prior version:** (Part 5.1) CIP 004-4, R4.2

**Change Rationale:** (Part 5.1)

*The FERC Order No. 706, Paragraphs 460 and 461, directs modifications to the Standards to **require immediate revocation** for any person no longer needing access. To address this directive, this requirement specifies revocation concurrent with the termination instead of within 24 hours.*

**Reference to prior version:** (Part 5.2) CIP-004-4, R4.2

**Change Rationale:** (Part 5.2)

*FERC Order No. 706, Paragraph 460 and 461, direct modifications to the Standards to require immediate revocation for any person no longer needing access, including transferred employees. In reviewing how to modify this requirement, the SDT determined the date a person no longer needs access after a transfer was problematic because the need may change over time. As a result, the SDT adapted this requirement from NIST 800-53 Version 3 to review access authorizations on the date of the transfer. The SDT felt this was a more effective control in accomplishing the objective to prevent a person from accumulating unnecessary authorizations through transfers.*

**Reference to prior version:** (Part 5.3) New

**Change Rationale:** (Part 5.3)

*FERC Order No. 706, Paragraph 386, directs modifications to the standards to require prompt revocation of access to protected information. To address this directive, Responsible Entities are required to revoke access to areas designated for BES Cyber System Information. This could include records closets, substation control houses, records management systems, file shares or other physical and logical areas under the Responsible Entity's control.*

**Reference to prior version:** (Part 5.4) New

**Change Rationale:** (Part 5.4)

*FERC Order No. 706, Paragraph 460 and 461, direct modifications to the Standards to require immediate revocation for any person no longer needing access. In order to meet the immediate timeframe, Responsible Entities will likely have initial revocation procedures to prevent remote and physical access to the BES Cyber System. Some cases may take more time to coordinate access revocation on individual Cyber Assets and applications without affecting reliability. This requirement provides the additional time to review and complete the revocation process. Although the initial actions already prevent further access, this step provides additional assurance in the access revocation process.*

**Reference to prior version:** (Part 5.5) CIP-007-4, R5.2.3

**Change Rationale:** (Part 5.5)

*To provide clarification of expected actions in managing the passwords.*

## Version History

Version	Date	Action	Change Tracking
1	1/16/06	R3.2 — Change “Control Center” to “control center.”	3/24/06
2	9/30/09	Modifications to clarify the requirements and to bring the compliance elements into conformance with the latest guidelines for developing compliance elements of standards. Removal of reasonable business judgment. Replaced the RRO with the RE as a responsible entity. Rewording of Effective Date. Changed compliance monitor to Compliance Enforcement Authority.	
3	12/16/09	Updated version number from -2 to -3 Approved by the NERC Board of Trustees.	
3	3/31/10	Approved by FERC.	
4	12/30/10	Modified to add specific criteria for Critical Asset identification.	Update
4	1/24/11	Approved by the NERC Board of Trustees.	Update
5	11/26/12	Adopted by the NERC Board of Trustees.	Modified to coordinate with other CIP standards and to revise format to use RBS Template.
<a href="#">5.1</a>	<a href="#">TBD</a>	<a href="#">Modified two VSLs in R4.</a>	<a href="#">Errata</a>