UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

) Docket Nos. RD10-6-000,) RD09-7-002

COMPLIANCE FILING OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION IN RESPONSE TO JANUARY 20, 2011 ORDER ON VIOLATION RISK FACTORS AND VIOLATION SEVERITY LEVELS FOR CRITICAL INFRASTRUCTURE PROTECTION RELIABILITY STANDARDS

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March 21, 2011

TABLE OF CONTENTS

| I. | INTRODUCTION | 2 |
|------|---|-----|
| II. | NOTICES AND COMMUNICATIONS | 2 |
| III. | REVISIONS TO CIP VIOLATION RISK FACTORS AND CIP VIOLATION SEVERITY LEVELS | 3 |
| V. | CONCLUSION | 4 |
| | EXHIBIT A – CIP VIOLATION RISK FACTORS AND VIOLATION SEVER LEVELS – VERSION 1 | ITY |
| | EXHIBIT B – CIP VIOLATION RISK FACTORS AND VIOLATION SEVER LEVELS – VERSION 2 (CLEAN AND REDLINE) | ITY |
| | EXHIBIT C – CIP VIOLATION RISK FACTORS AND VIOLATION SEVER LEVELS – VERSION 3 (CLEAN AND REDLINE) | ITY |

EXHIBIT D – CIP VIOLATION RISK FACTORS AND VIOLATION SEVERITY LEVELS – VERSION 4 (CLEAN AND REDLINE)

I. INTRODUCTION

The North American Electric Reliability Corporation ("NERC"), in compliance with the

directive in the Federal Energy Regulatory Commission's ("FERC" or the "Commission")

January 20, 2011 Order ("January 20 Order"),¹ directing NERC's to file complete sets of

Violation Risk Factors ("VRFs") and Violation Severity Levels ("VSLs") to the Version 2 and

Version 3 Critical Infrastructure Protection ("CIP") Standards, hereby submits this compliance

filing that includes the following:

- A redline of the VRFs and VSLs for the CIP Version 2 Reliability Standards that includes the FERC-approved VRFs and VSLs for CIP Version 2 plus the directed modifications from the January 20, 2011 Order (Exhibit B);
- A redline of the VRFs and VSLs for the CIP Version 3 Reliability Standards that includes the FERC-approved VRFs and VSLs for CIP Version 3 plus the directed modifications from the January 20, 2011 Order (Exhibit C);
- A redline of the VRFs and the VSLs for the CIP Version 4 Reliability Standards carried over from the CIP Versions 2 and 3 VRFs and VSLs proposed in this filing for approval (**Exhibit D**). NERC is requesting that the CIP Version 4 VRFs and VSLs included in this filing replace the proposed CIP Version 4 VRFs and VSLs included in NERC's February 10, 2011 Petition for Approval of the CIP Version 4 Reliability Standards;² and
- The complete set of FERC-approved VRFs and VSLs for CIP Version 1 (Exhibit A) is included for reference.

II. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to the

following:

Gerald W. Cauley President and Chief Executive Officer David N. Cook* Senior Vice President and General Counsel Holly A. Hawkins* Assistant General Counsel for Standards and Critical Infrastructure Protection North American Electric Reliability

¹ Order on Version 2 and Version 3 Violation Risk Factors and Violation Severity Levels for Critical Infrastructure Protection Reliability Standards, 134 FERC ¶ 61,045 (January 20, 2011).

² Petition of the North American Electric Reliability Corporation for Approval of Critical Infrastructure Protection (CIP) Reliability Standards Version 4, Docket No. RM06-22-000 (February 10, 2011)

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*Persons to be included on the Commission's official service list.

III. <u>REVISIONS TO CIP VIOLATION RISK FACTORS AND CIP VIOLATION</u> <u>SEVERITY LEVELS</u>

On December 18, 2009, NERC filed a petition requesting FERC approval of proposed VRFs and VSLs for the CIP Version 2 Reliability Standards.³ On December 29, 2009, NERC filed a petition for approval of the proposed VRFs and VSLs for the CIP Version 3 Reliability Standards.⁴ FERC's January 20 Order approved the VRFs and VSLs for the CIP Versions 2 and 3 Standards, and directed modifications to be filed by March 21, 2011.

On February 10, 2011, NERC filed a petition for approval of the CIP Version 4 Standards that carried over the VRFs and VSLs from Versions 2 and 3 to Version 4.⁵ Due to the short amount of time between the issuance of FERC's January 20 Order and NERC's February 10 filing, the VRFs and VSLs included in NERC's CIP Version 4 petition did not take into consideration the changes directed in the Commission's January 20 Order.

NERC staff has prepared a comprehensive set of VRFs and VSLs for CIP Versions 2, 3, and 4 based on the VRFs and VSLs approved in the January 20 Order. The comprehensive set

³ Petition of the North American Electric Reliability Corporation for Approval of Violation Severity Levels to Critical Infrastructure Protection (CIP) Version 2 Reliability Standards CIP-002-2 through CIP-009-2 And Violation Risk Factors For CIP-003-2 and CIP-006-2, Docket Nos. RM06-22-000 and RD09-7-000 (December 18, 2009)

 ⁴ Compliance Filing of the North American Electric Reliability Corporation in Response to the Federal Energy Regulatory Commission's September 30, 2009 Order Approving Revised Reliability Standards for Critical Infrastructure Protection and Requiring Compliance Filing, Docket No. RD09-7-000 (December 29, 2009)
 ⁵ Petition of the North American Electric Reliability Corporation for Approval of Critical Infrastructure Protection

⁽CIP) Reliability Standards Version 4, Docket No. RM06-22-000 (February 10, 2011)

also includes the directed changes from the January 20 Order as well as minor, conforming changes. Accordingly, NERC hereby submits this compliance filing in response to the January 20 Order modifying the VRFs and VSLs for CIP Version 2 and 3 based on the guidance provided by the Commission on January 20. NERC also requests that the proposed CIP Version 4 VRFs and VSLs included in this filing replace the proposed CIP Version 4 VRFs and VSLs included in NERC's February 10, 2011 Petition for Approval of the CIP Version 4 Reliability Standards. The VRFs and VSLs included herein for Commission approval were approved by NERC's Board of Trustees on March 10, 2011.

V. CONCLUSION

The North American Electric Reliability Corporation respectfully requests that the Commission accept this Compliance Filing in accordance with the Commission's directives in the January 20, 2011 Order.

Respectfully submitted,

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/s/ Holly A. Hawkins

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 21st day of March, 2011.

<u>/s/ Holly A. Hawkins</u> Holly A. Hawkins Attorney for North American Electric Reliability Corporation

EXHIBIT A CIP VIOLATION RISK FACTORS AND VIOLATION SEVERITY LEVELS – VERSION 1

CIP Version 1 Violation Severity Levels and Violation Risk Factors

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|---|--|---|
| CIP-001-1 | R1. | Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load-Serving Entity shall have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi site sabotage affecting larger portions of the Interconnection. | N/A | N/A | The responsible entity has procedures for the recognition of sabotage events on its facilities and multi site sabotage affecting larger portions of the Interconnection but does not have a procedure for making their operating personnel aware of said events. | The responsible entity failed to have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi site sabotage affecting larger portions of the Interconnection. |
| CIP-001-1 | R2. | Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load-Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection. | N/A | N/A | The responsible entity has demonstrated the existence of a procedure to communicate information concerning sabotage events, but not all of the appropriate parties in the interconnection are identified. | The responsible entity failed to have a procedure for communicating information concerning sabotage events. |
| CIP-001-1 | R3. | Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load-Serving Entity shall | N/A | The responsible entity has demonstrated the existence of a response guideline | The responsible entity has demonstrated the existence of a response guideline | The responsible entity failed to have a response guideline for reporting disturbances due to sabotage events. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|---|---|--|
| | | provide its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events. | | for reporting disturbances due to sabotage events, but the guideline did not list all of the appropriate personnel to contact. | for reporting disturbances due to sabotage events, including all of the appropriate personnel to contact, but the guideline was not available to its operating personnel. | |
| CIP-001-1 | R4. | Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load-Serving Entity shall establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials and develop reporting procedures as appropriate to their circumstances. | N/A | N/A | The responsible entity has established communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials, but has not developed a reporting procedure. | The responsible entity failed to establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials, nor developed a reporting procedure. |
| CIP-002-1 | R1. | Critical Asset Identification Method — The Responsible Entity shall identify and document a risk-based assessment methodology to use to identify its Critical Assets. | N/A | N/A | N/A | The responsible entity has not documented a risk-based assessment methodology to use to identify its Critical Assets as specified in R1. |
| CIP-002-1 | R1.1 | The Responsible Entity shall maintain documentation describing its risk-based assessment methodology that includes procedures and | N/A | The Responsible Entity maintained documentation describing its risk- based assessment | The Responsible Entity maintained documentation describing its risk- based assessment | The Responsible Entity did not maintain documentation describing its risk-based assessment |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|---|---|---|
| | | evaluation criteria. | | methodology which includes evaluation criteria, but does not include procedures. | methodology that includes procedures but does not include evaluation criteria. | methodology that includes procedures and evaluation criteria. |
| CIP-002-1 | R1.2 | The risk-based assessment shall consider the following assets: | N/A | N/A | N/A | The Responsible Entity did not consider all of the asset types listed in R1.2.1 through R1.2.7 in its risk-based assessment. |
| CIP-002-1 | R1.2.1. | Control centers and backup control centers performing the functions of the entities listed in the Applicability section of this standard. | N/A | N/A | N/A | N/A |
| CIP-002-1 | R1.2.2. | Transmission substations that support the reliable operation of the Bulk Electric System. | N/A | N/A | N/A | N/A |
| CIP-002-1 | R1.2.3. | Generation resources that support the reliable operation of the Bulk Electric System. | N/A | N/A | N/A | N/A |
| CIP-002-1 | R1.2.4. | Systems and facilities critical to system restoration, including blackstart generators and substations in the electrical path of transmission lines used for initial system restoration. | N/A | N/A | N/A | N/A |
| CIP-002-1 | R1.2.5. | Systems and facilities critical to automatic load shedding under a common control system capable of shedding | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|---|---|
| | | 300 MW or more. | | | | |
| CIP-002-1 | R1.2.6. | Special Protection Systems that support the reliable operation of the Bulk Electric System. | N/A | N/A | N/A | N/A |
| CIP-002-1 | R1.2.7. | Any additional assets that support the reliable operation of the Bulk Electric System that the Responsible Entity deems appropriate to include in its assessment. | N/A | N/A | N/A | N/A |
| CIP-002-1 | R2. | Critical Asset Identification — The Responsible Entity shall develop a list of its identified Critical Assets determined through an annual application of the risk-based assessment methodology required in R1. The Responsible Entity shall review this list at least annually, and update it as necessary. | N/A | N/A | The Responsible Entity has developed a list of Critical Assets but the list has not been reviewed and updated annually as required. | The Responsible Entity did not develop a list of its identified Critical Assets even if such list is null. |
| CIP-002-1 | R3. | Critical Cyber Asset Identification — Using the list of Critical Assets developed pursuant to Requirement R2, the Responsible Entity shall develop a list of associated Critical Cyber Assets essential to the operation of the Critical Asset. Examples at control centers and backup control centers | N/A | N/A | The Responsible Entity has developed a list of associated Critical Cyber Assets essential to the operation of the Critical Asset list as per requirement R2 but the list has not been reviewed and updated annually as required. | The Responsible Entity did not develop a list of associated Critical Cyber Assets essential to the operation of the Critical Asset list as per requirement R2 even if such list is null. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|----------|---|
| | | include systems and facilities at master and remote sites that provide monitoring and control, automatic generation control, real-time power system modeling, and real-time inter utility data exchange. The Responsible Entity shall review this list at least annually, and update it as necessary. For the purpose of Standard CIP- 002, Critical Cyber Assets are further qualified to be those having at least one of the following characteristics: | | | | |
| CIP-002-1 | R3.1 | The Cyber Asset uses a routable protocol to communicate outside the Electronic Security Perimeter; or, | N/A | N/A | N/A | A Cyber Asset essential to the operation of the Critical Asset was identified that met the criteria in this requirement but was not included in the Critical Cyber Asset List. |
| CIP-002-1 | R3.2. | The Cyber Asset uses a routable protocol within a control center; or, | N/A | N/A | N/A | A Cyber Asset essential to the operation of the Critical Asset was identified that met the criteria in this requirement but was not included in the Critical Cyber Asset List. |
| CIP-002-1 | R3.3. | The Cyber Asset is dial-up accessible. | N/A | N/A | N/A | A Cyber Asset essential to the operation of the Critical Asset was identified that met the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|--|---|
| | | | | | | criteria in this requirement but was not included in the Critical Cyber Asset List. |
| CIP-002-1 | R4. | Annual Approval — A senior manager or delegate(s) shall approve annually the list of Critical Assets and the list of Critical Cyber Assets. Based on Requirements R1, R2, and R3 the Responsible Entity may determine that it has no Critical Assets or Critical Cyber Assets. The Responsible Entity shall keep a signed and dated record of the senior manager or delegate(s)'s approval of the list of Critical Assets and the list of Critical Cyber Assets (even if such lists are null.) | N/A | N/A | The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s)'s annual approval of the list of Critical Assets. OR The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s)'s annual approval of the list of Critical Cyber Assets (even if such lists are null.) | The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s)'s annual approval of both the list of Critical Assets and the list of Critical Cyber Assets (even if such lists are null.) |
| CIP-003-1 | R1. | Cyber Security Policy — The Responsible Entity shall document and implement a cyber security policy that represents management's commitment and ability to secure its Critical Cyber Assets. The Responsible Entity shall, at minimum, ensure the following: | N/A | N/A | N/A | The Responsible Entity has not documented or implemented a cyber security policy. |
| CIP-003-1 | R1.1. | The cyber security policy addresses the requirements | N/A | N/A | N/A | The Responsible Entity's cyber security policy |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|---|---|
| | | in Standards CIP-002 through CIP-009, including provision for emergency situations. | | | | does not address all the requirements in Standards CIP-002 through CIP-009, including provision for emergency situations. |
| CIP-003-1 | R1.2. | The cyber security policy is readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets. | N/A | N/A | N/A | The Responsible Entity's cyber security policy is not readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets. |
| CIP-003-1 | R1.3 | Annual review and approval of the cyber security policy by the senior manager assigned pursuant to R2. | N/A | N/A | N/A | The Responsible Entity's senior manager, assigned pursuant to R2, did not complete the annual review and approval of its cyber security policy. |
| CIP-003-1 | R2. | Leadership — The Responsible Entity shall assign a senior manager with overall responsibility for leading and managing the entity's implementation of, and adherence to, Standards CIP-002 through CIP-009. | N/A | N/A | N/A | The Responsible Entity has not assigned a senior manager with overall responsibility for leading and managing the entity's implementation of, and adherence to, Standards CIP-002 through CIP-009. |
| CIP-003-1 | R2.1. | The senior manager shall be identified by name, title, business phone, business address, and date of designation. | N/A | N/A | The senior manager is identified by name, title, and date of designation but the designation is | Identification of the senior manager is missing one of the following: name, title, or date of designation. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|--|---|
| | | | | | missing business phone or business address. | |
| CIP-003-1 | R2.2. | Changes to the senior manager must be documented within thirty calendar days of the effective date. | N/A | N/A | N/A | Changes to the senior manager were not documented within 30 days of the effective date. |
| CIP-003-1 | R2.3. | The senior manager or delegate(s) shall authorize and document any exception from the requirements of the cyber security policy. | N/A | N/A | N/A | The senior manager or delegate(s) did not authorize and document any exception from the requirements of the cyber security policy as required. |
| CIP-003-1 | R3. | Exceptions — Instances where the Responsible Entity cannot conform to its cyber security policy must be documented as exceptions and authorized by the senior manager or delegate(s). | N/A | N/A | In Instances where the Responsible Entity cannot conform to its cyber security policy, in R1, exceptions were documented, but were not authorized by the senior manager or delegate(s). | In Instances where the Responsible Entity cannot conform to its cyber security policy, in R1, exceptions were not documented. |
| CIP-003-1 | R3.1. | Exceptions to the Responsible Entity's cyber security policy must be documented within thirty days of being approved by the senior manager or delegate(s). | N/A | N/A | N/A | Exceptions to the Responsible Entity's cyber security policy were not documented within 30 days of being approved by the senior manager or delegate(s). |
| CIP-003-1 | R3.2. | Documented exceptions to | N/A | N/A | N/A | The Responsible Entity |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|---|--|
| | | the cyber security policy must include an explanation as to why the exception is necessary and any compensating measures, or a statement accepting risk. | | | | has a documented exception to the cyber security policy in R1, but did not include both: |
| | | | | | | an explanation as to why the exception is necessary, and |
| | | | | | | 2) any compensating measures or a statement accepting risk. |
| CIP-003-1 | R3.3. | Authorized exceptions to the cyber security policy must be reviewed and approved annually by the senior manager or delegate(s) to ensure the exceptions are still required and valid. Such review and approval shall be documented. | N/A | N/A | N/A | Exceptions to the cyber security policy were not reviewed or were not approved on an annual basis by the senior manager or delegate(s) to ensure the exceptions are still required and valid or the review and approval is not documented. |
| CIP-003-1 | R4. | Information Protection — The Responsible Entity shall implement and document a program to identify, classify, and protect information associated with Critical Cyber Assets. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document a program to identify, classify, and protect information associated with Critical Cyber Assets. |
| CIP-003-1 | R4.1. | The Critical Cyber Asset information to be protected shall include, at a minimum | N/A | N/A | The information protection program does not include one | The information protection program does not include two or |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|--|--|
| | | and regardless of media type, operational procedures, lists as required in Standard CIP-002, network topology or similar diagrams, floor plans of computing centers that contain Critical Cyber Assets, equipment layouts of Critical Cyber Assets, disaster recovery plans, incident response plans, and security configuration information. | | | of the minimum information types to be protected as detailed in R4.1. | more of the minimum information types to be protected as detailed in R4.1. |
| CIP-003-1 | R4.2. | The Responsible Entity shall classify information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. | N/A | N/A | N/A | The Responsible Entity did not classify the information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. |
| CIP-003-1 | R4.3. | The Responsible Entity shall, at least annually, assess adherence to its Critical Cyber Asset information protection program, document the assessment results, and implement an action plan to remediate deficiencies identified during the assessment. | N/A | N/A | N/A | The Responsible Entity did not annually assess adherence to its Critical Cyber Asset information protection program, including documentation of the assessment results, OR The Responsible Entity did not implement an action plan to remediate deficiencies identified during the assessment. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|--|---|
| CIP-003-1 | R5. | Access Control — The Responsible Entity shall document and implement a program for managing access to protected Critical Cyber Asset information. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document a program for managing access to protected Critical Cyber Asset information. |
| CIP-003-1 | R5.1. | The Responsible Entity shall maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information. | N/A | N/A | The Responsible Entity maintained a list of designated personnel for authorizing either logical or physical access but not both. | The Responsible Entity did not maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information. |
| CIP-003-1 | R5.1.1. | Personnel shall be identified by name, title, business phone and the information for which they are responsible for authorizing access. | N/A | N/A | The Responsible Entity did identify the personnel by name, title, and the information for which they are responsible for authorizing access, but the business phone is missing. | Personnel are not identified by name, title, or the information for which they are responsible for authorizing access. |
| CIP-003-1 | R5.1.2. | The list of personnel responsible for authorizing access to protected information shall be verified at least annually. | N/A | N/A | N/A | The Responsible Entity did not verify at least annually the list of personnel responsible for authorizing access to protected information. |
| CIP-003-1 | R5.2. | The Responsible Entity shall review at least annually the access privileges to protected information to | N/A | N/A | N/A | The Responsible Entity did not review at least annually the access privileges to protected |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|---------------------------------------|---------------------------------------|--|--|
| | | confirm that access privileges are correct and that they correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities. | | | | information to confirm that access privileges are correct and that they correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities. |
| CIP-003-1 | R5.3. | The Responsible Entity shall assess and document at least annually the processes for controlling access privileges to protected information. | N/A | N/A | N/A | The Responsible Entity did not assess and document at least annually the processes for controlling access privileges to protected information. |
| CIP-003-1 | R6. | Change Control and Configuration Management — The Responsible Entity shall establish and document a process of change control and configuration management for adding, modifying, replacing, or removing Critical Cyber Asset hardware or software, and implement supporting configuration management activities to identify, control and document all entity or vendor related changes to hardware and software components of Critical Cyber Assets pursuant to the change control process. | N/A | N/A | N/A | The Responsible Entity has not established or documented a change control process for the activities required in R6, OR The Responsible Entity has not established or documented a configuration management process for the activities required in R6. |
| CIP-004-1 | R1. | Awareness — The Responsible Entity shall | The Responsible Entity established | The Responsible Entity established | The Responsible Entity did document | The Responsible Entity did not establish, |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|---|--|--|---|
| | | establish, maintain, and document a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access receive on- going reinforcement in sound security practices. The program shall include security awareness reinforcement on at least a quarterly basis using mechanisms such as: • 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.). | and maintained but did not document a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access receive on- going reinforcement in sound security practices. | and maintained but did not document a security awareness program to ensure personnel having authorized cyber or authorized dunescorted physical access receive on- going reinforcement in sound security practices. AND The Responsible Entity did not provide security awareness reinforcement on at least a quarterly basis. | but did not establish nor maintain a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access receive on- going reinforcement in sound security practices. | maintain, nor document a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access receive on-going reinforcement in sound security practices. |
| CIP-004-1 | R2. | Training — The Responsible Entity shall establish, maintain, and document an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets, and review the program annually and update as necessary. | The Responsible Entity established and maintained but did not document an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical | The Responsible Entity established and maintained but did not document an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical | The Responsible Entity did document but did not establish nor maintain an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical | The Responsible Entity did not establish, maintain, nor document an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-------------------------------------|--|-------------------------------------|---|
| | | | access to Critical Cyber Assets. | access to Critical Cyber Assets AND The Responsible Entity did not review the training program on an annual basis. | access to Critical Cyber Assets. | |
| CIP-004-1 | R2.1. | This program will ensure that all personnel having such access to Critical Cyber Assets, including contractors and service vendors, are trained within ninety calendar days of such authorization. | N/A | N/A | N/A | Not all personnel having access to Critical Cyber Assets, including contractors and service vendors, were trained within ninety calendar days of such authorization. |
| CIP-004-1 | R2.2. | Training shall cover the policies, access controls, and procedures as developed for the Critical Cyber Assets covered by CIP-004, and include, at a minimum, the following required items appropriate to personnel roles and responsibilities: | N/A | N/A | N/A | The training does not include one or more of the minimum topics as detailed in R2.2.1, R2.2.2, R2.2.3, R2.2.4. |
| CIP-004-1 | R2.2.1. | The proper use of Critical Cyber Assets; | N/A | N/A | N/A | N/A |
| CIP-004-1 | R2.2.2. | Physical and electronic access controls to Critical Cyber Assets; | N/A | N/A | N/A | N/A |
| CIP-004-1 | R2.2.3. | The proper handling of Critical Cyber Asset information; and, | N/A | N/A | N/A | N/A |
| CIP-004-1 | R2.2.4. | Action plans and procedures to recover or re-establish | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | Critical Cyber Assets and access thereto following a Cyber Security Incident. | | | | |
| CIP-004-1 | R2.3. | The Responsible Entity shall maintain documentation that training is conducted at least annually, including the date the training was completed and attendance records. | N/A | N/A | The Responsible Entity did maintain documentation that training is conducted at least annually, but did not include attendance records. | The Responsible Entity did not maintain documentation that training is conducted at least annually, including the date the training was completed and attendance records. |
| CIP-004-1 | R3. | Personnel Risk Assessment —The Responsible Entity shall have a documented personnel risk assessment program, in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements, for personnel having authorized cyber or authorized unescorted physical access. A personnel risk assessment shall be conducted pursuant to that program within thirty days of such personnel being granted such access. Such program shall at a minimum include: | N/A | The Responsible Entity has a personnel risk assessment program, as stated in R3, for personnel having authorized cyber or authorized unescorted physical access, but the program is not documented. | The Responsible Entity has a personnel risk assessment program as stated in R3, but conducted the personnel risk assessment pursuant to that program in more than thirty (30) days of such personnel being granted such access. | The Responsible Entity does not have a documented personnel risk assessment program, as stated in R3, for personnel having authorized cyber or authorized unescorted physical access. OR The Responsible Entity did not conduct the personnel risk assessment pursuant to that program for personnel granted such access. |
| CIP-004-1 | R3.1. | The Responsible Entity shall ensure that each assessment conducted include, at least, identity verification (e.g., Social Security Number verification in the U.S.) and | N/A | N/A | The Responsible Entity did not ensure that an assessment conducted included an identity verification (e.g., | The Responsible Entity did not ensure that each assessment conducted include, at least, identity verification (e.g., Social |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | seven year criminal check. The Responsible Entity may conduct more detailed reviews, as permitted by law and subject to existing collective bargaining unit agreements, depending upon the criticality of the position. | | | Social Security Number verification in the U.S.) or a seven-year criminal check. | Security Number verification in the U.S.) and seven-year criminal check. |
| CIP-004-1 | R3.2. | The Responsible Entity shall update each personnel risk assessment at least every seven years after the initial personnel risk assessment or for cause. | N/A | The Responsible Entity did not update each personnel risk assessment at least every seven years after the initial personnel risk assessment but did update it for cause when applicable. | The Responsible Entity did not update each personnel risk assessment for cause (when applicable) but did at least updated it every seven years after the initial personnel risk assessment. | The Responsible Entity did not update each personnel risk assessment at least every seven years after the initial personnel risk assessment nor was it updated for cause when applicable. |
| CIP-004-1 | R3.3. | The Responsible Entity shall document the results of personnel risk assessments of its personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets, and that personnel risk assessments of contractor and service vendor personnel with such access are conducted pursuant to Standard CIP- 004. | The Responsible Entity did not document the results of personnel risk assessments for at least one individual but less than 5% of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | The Responsible Entity did not document the results of personnel risk assessments for 5% or more but less than 10% of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | The Responsible Entity did not document the results of personnel risk assessments for 10% or more but less than 15% of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | The Responsible Entity did not document the results of personnel risk assessments for 15% or more of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-004-1 | R4. | Access — The Responsible Entity shall maintain list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets. | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets, missing at least one individual but less than 5% of the authorized personnel. | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets, missing 5% or more but less than 10% of the authorized personnel. | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets, missing 10% or more but less than 15%of the authorized personnel. | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets, missing 15% or more of the authorized personnel. |
| CIP-004-1 | R4.1. | The Responsible Entity shall review the list(s) of its personnel who have such access to Critical Cyber Assets quarterly, and update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, or any change in the access rights of such personnel. The Responsible Entity shall ensure access list(s) for contractors and service vendors are properly maintained. | N/A | The Responsible Entity did not review the list(s) of its personnel who have access to Critical Cyber Assets quarterly. | The Responsible Entity did not update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, nor any change in the access rights of such personnel. | The Responsible Entity did not review the list(s) of all personnel who have access to Critical Cyber Assets quarterly, nor update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, nor any change in the access rights of such personnel. |
| CIP-004-1 | R4.2. | The Responsible Entity shall | N/A | The Responsible | The Responsible | The Responsible Entity |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | revoke such access to Critical Cyber Assets within 24 hours for personnel terminated for cause and within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. | | Entity did not revoke access within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. | Entity did not revoke access to Critical Cyber Assets within 24 hours for personnel terminated for cause. | did not revoke access to Critical Cyber Assets within 24 hours for personnel terminated for cause nor within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. |
| CIP-005-1 | R1. | Electronic Security Perimeter — The Responsible Entity shall ensure that every Critical Cyber Asset resides within an Electronic Security Perimeter. The Responsible Entity shall identify and document the Electronic Security Perimeter(s) and all access points to the perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not ensure that every Critical Cyber Asset resides within an Electronic Security Perimeter. OR The Responsible Entity did not identify and document the Electronic Security Perimeter(s) and all access points to the perimeter(s). |
| CIP-005-1 | R1.1. | Access points to the Electronic Security Perimeter(s) shall include any externally connected communication end point (for example, dial-up modems) terminating at any device within the Electronic Security Perimeter(s). | N/A | N/A | N/A | Access points to the Electronic Security Perimeter(s) do not include all externally connected communication end point (for example, dial- up modems) terminating at any device within the Electronic Security Perimeter(s). |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-005-1 | R1.2. | For a dial-up accessible Critical Cyber Asset that uses a non-routable protocol, the Responsible Entity shall define an Electronic Security Perimeter for that single access point at the dial-up device. | N/A | N/A | N/A | For one or more dial-up accessible Critical Cyber Assets that use a non- routable protocol, the Responsible Entity did not define an Electronic Security Perimeter for that single access point at the dial-up device. |
| CIP-005-1 | R1.3. | Communication links connecting discrete Electronic Security Perimeters shall not be considered part of the Electronic Security Perimeter. However, end points of these communication links within the Electronic Security Perimeter(s) shall be considered access points to the Electronic Security Perimeter(s). | N/A | N/A | N/A | At least one end point of a communication link within the Electronic Security Perimeter(s) connecting discrete Electronic Security Perimeters was not considered an access point to the Electronic Security Perimeter. |
| CIP-005-1 | R1.4. | Any non-critical Cyber Asset within a defined Electronic Security Perimeter shall be identified and protected pursuant to the requirements of Standard CIP-005. | N/A | N/A | N/A | One or more noncritical Cyber Asset within a defined Electronic Security Perimeter is not identified. OR Is not protected pursuant to the requirements of Standard CIP-005. |
| CIP-005-1 | R1.5. | Cyber Assets used in the access control and | N/A | N/A | N/A | A Cyber Asset used in the access control and |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | monitoring of the Electronic Security Perimeter(s) shall be afforded the protective measures as a specified in Standard CIP-003, Standard CIP-004 Requirement R3, Standard CIP-005 Requirements R2 and R3, Standard CIP-006 Requirements R2 and R3, Standard CIP-007, Requirements R1 and R3 through R9, Standard CIP- 008, and Standard CIP-009. | | | | monitoring of the Electronic Security Perimeter(s) is not provided in one (1) or more of the protective measures as specified in Standard CIP-003, Standard CIP-004 Requirement R3, Standard CIP-005 Requirements R2 and R3, Standard CIP-006 Requirements R2 and R3, Standard CIP-007, Requirements R1 and R3 through R9, Standard CIP-008, and Standard CIP-009. |
| CIP-005-1 | R1.6. | The Responsible Entity shall maintain documentation of Electronic Security Perimeter(s), all interconnected Critical and non-critical Cyber Assets within the Electronic Security Perimeter(s), all electronic access points to the Electronic Security Perimeter(s) and the Cyber Assets deployed for the access control and monitoring of these access points. | N/A | N/A | N/A | The Responsible Entity did not maintain documentation of one or more of the following: Electronic Security Perimeter(s), interconnected Critical and noncritical Cyber Assets within the Electronic Security Perimeter(s), electronic access points to the Electronic Security Perimeter(s) and Cyber Assets deployed for the access control and monitoring of these access points. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-005-1 | R2. | Electronic Access Controls — The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not implement or did not document the organizational processes and technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s). |
| CIP-005-1 | R2.1. | These processes and mechanisms shall use an access control model that denies access by default, such that explicit access permissions must be specified. | N/A | N/A | N/A | The processes and mechanisms did not use an access control model that denies access by default, such that explicit access permissions must be specified. |
| CIP-005-1 | R2.2. | At all access points to the Electronic Security Perimeter(s), the Responsible Entity shall enable only ports and services required for operations and for monitoring Cyber Assets within the Electronic Security Perimeter, and shall document, individually or by specified grouping, the configuration of those ports and services. | N/A | N/A | N/A | At one or more access points to the Electronic Security Perimeter(s), the Responsible Entity enabled ports and services not required for operations and for monitoring Cyber Assets within the Electronic Security Perimeter, or did not document, individually or by specified grouping, the configuration of those ports and services. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-005-1 | R2.3. | The Responsible Entity shall maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s) where applicable. |
| CIP-005-1 | R2.4. | Where external interactive access into the Electronic Security Perimeter has been enabled, the Responsible Entity shall implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible. | N/A | N/A | N/A | Where external interactive access into the Electronic Security Perimeter has been enabled the Responsible Entity did not implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible. |
| CIP-005-1 | R2.5. | The required documentation shall, at least, identify and describe: | N/A | N/A | N/A | The required documentation for R2 did not include one or more of the elements described in R2.5.1 through R2.5.4. |
| CIP-005-1 | R2.5.1. | The processes for access request and authorization. | N/A | N/A | N/A | N/A |
| CIP-005-1 | R2.5.2. | The authentication methods. | N/A | N/A | N/A | N/A |
| CIP-005-1 | R2.5.3. | The review process for authorization rights, in accordance with Standard CIP-004 Requirement R4. | N/A | N/A | N/A | N/A |
| CIP-005-1 | R2.5.4. | The controls used to secure | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | dial-up accessible connections. | | | | |
| CIP-005-1 | R2.6. | Appropriate Use Banner — Where technically feasible, electronic access control devices shall display an appropriate use banner on the user screen upon all interactive access attempts. The Responsible Entity shall maintain a document identifying the content of the banner. | The Responsible Entity did not maintain a document identifying the content of the banner. OR Where technically feasible less than 5% electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. | Where technically feasible 5% but less than 10% of electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. | Where technically feasible 10% but less than 15% of electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. | Where technically feasible, 15% or more electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. |
| CIP-005-1 | R3. | Monitoring Electronic Access — The Responsible Entity shall implement and document an electronic or manual process(es) for monitoring and logging access at access points to the Electronic Security Perimeter(s) twenty-four hours a day, seven days a week. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document electronic or manual processes monitoring and logging access points. |
| CIP-005-1 | R3.1. | For dial-up accessible Critical Cyber Assets that use non- routable protocols, the Responsible Entity shall | N/A | N/A | N/A | Where technically feasible, the Responsible Entity did not implement or did |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | implement and document monitoring process(es) at each access point to the dial- up device, where technically feasible. | | | | not document electronic or manual processes for monitoring at one or more access points to dial-up devices. |
| CIP-005-1 | R3.2. | Where technically feasible, the security monitoring process(es) shall detect and alert for attempts at or actual unauthorized accesses. These alerts shall provide for appropriate notification to designated response personnel. Where alerting is not technically feasible, the Responsible Entity shall review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. | N/A | N/A | N/A | Where technically feasible, the Responsible Entity did not implement security monitoring process(es) to detect and alert for attempts at or actual unauthorized accesses. OR The above alerts do not provide for appropriate notification to designated response personnel. OR Where alerting is not technically feasible, the Responsible Entity did not review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. |
| CIP-005-1 | R4. | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of the electronic | N/A | N/A | N/A | The Responsible Entity did not perform a Vulnerability Assessment at least annually for one or |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | access points to the Electronic Security Perimeter(s) at least annually. The vulnerability assessment shall include, at a minimum, the following: | | | | more of the access points to the Electronic Security Perimeter(s). OR The vulnerability assessment did not include one (1) or more of the subrequirements R4.1, R4.2, R4.3, R4.4, R4.5. |
| CIP-005-1 | R4.1. | A document identifying the vulnerability assessment process; | N/A | N/A | N/A | N/A |
| CIP-005-1 | R4.2. | A review to verify that only ports and services required for operations at these access points are enabled; | N/A | N/A | N/A | N/A |
| CIP-005-1 | R4.3. | The discovery of all access points to the Electronic Security Perimeter; | N/A | N/A | N/A | N/A |
| CIP-005-1 | R4.4. | A review of controls for default accounts, passwords, and network management community strings; and, | N/A | N/A | N/A | N/A |
| CIP-005-1 | R4.5. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | N/A | N/A | N/A | N/A |
| CIP-005-1 | R5. | Documentation Review and Maintenance — The Responsible Entity shall | The Responsible Entity did not review, update, and | The Responsible Entity did not review, update, and | The Responsible Entity did not review, update, and | The Responsible Entity did not review, update, and maintain greater |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | review, update, and maintain all documentation to support compliance with the requirements of Standard CIP-005. | maintain at least one but less than or equal to 5% of the documentation to support compliance with the requirements of Standard CIP-005. | maintain greater than 5% but less than or equal to 10% of the documentation to support compliance with the requirements of Standard CIP-005. | maintain greater than 10% but less than or equal to 15% of the documentation to support compliance with the requirements of Standard CIP-005. | than 15% of the documentation to support compliance with the requirements of Standard CIP-005. |
| CIP-005-1 | R5.1. | The Responsible Entity shall ensure that all documentation required by Standard CIP-005 reflect current configurations and processes and shall review the documents and procedures referenced in Standard CIP-005 at least annually. | N/A | The Responsible Entity did not provide evidence of an annual review of the documents and procedures referenced in Standard CIP-005. | The Responsible Entity did not document current configurations and processes referenced in Standard CIP-005. | The Responsible Entity did not document current configurations and processes and did not review the documents and procedures referenced in Standard CIP-005 at least annually. |
| CIP-005-1 | R5.2. | The Responsible Entity shall update the documentation to reflect the modification of the network or controls within ninety calendar days of the change. | N/A | N/A | N/A | The Responsible Entity did not update documentation to reflect a modification of the network or controls within ninety calendar days of the change. |
| CIP-005-1 | R5.3. | The Responsible Entity shall retain electronic access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008. | The Responsible Entity retained electronic access logs for 75 or more calendar days, but for less than 90 calendar days. | The Responsible Entity retained electronic access logs for 60 or more calendar days, but for less than 75 calendar days. | The Responsible Entity retained electronic access logs for 45 or more calendar days , but for less than 60 calendar days. | The Responsible Entity retained electronic access logs for less than 45 calendar days. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-006-1 | R1. | Physical Security Plan — The Responsible Entity shall create and maintain a physical security plan, approved by a senior manager or delegate(s) that shall address, at a minimum, the following: | N/A | N/A | The Responsible Entity created a physical security plan but did not gain approval by a senior manager or delegate(s). OR The Responsible Entity created but did not maintain a physical security plan. | The Responsible Entity did not create and maintain a physical security plan. |
| CIP-006-1 | R1.1. | Processes to ensure and document that all Cyber Assets within an Electronic Security Perimeter also reside within an identified Physical Security Perimeter. Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity shall deploy and document alternative measures to control physical access to the Critical Cyber Assets. | N/A | Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity has deployed but not documented alternative measures to control physical access to the Critical Cyber Assets. | Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity has not deployed alternative measures to control physical access to the Critical Cyber Assets. | The Responsible Entity's physical security plan does not include processes to ensure and document that all Cyber Assets within an Electronic Security Perimeter also reside within an identified Physical Security Perimeter. OR Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity has not deployed and documented alternative measures to control physical access to the Critical Cyber Assets. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-006-1 | R1.2. | Processes to identify all access points through each Physical Security Perimeter and measures to control entry at those access points. | N/A | The Responsible Entity's physical security plan includes measures to control entry at access points but not processes to identify all access points through each Physical Security Perimeter. | The Responsible Entity's physical security plan includes processes to identify all access points through each Physical Security Perimeter but not measures to control entry at those access points. | The Responsible Entity's physical security plan does not include processes to identify all access points through each Physical Security Perimeter nor measures to control entry at those access points. |
| CIP-006-1 | R1.3 | Processes, tools, and procedures to monitor physical access to the perimeter(s). | N/A | N/A | N/A | The Responsible Entity's physical security plan does not include processes, tools, and procedures to monitor physical access to the perimeter(s). |
| CIP-006-1 | R1.4 | Procedures for the appropriate use of physical access controls as described in Requirement R3 including visitor pass management, response to loss, and prohibition of inappropriate use of physical access controls. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not include procedures for the appropriate use of physical access controls as described in Requirement R3. |
| CIP-006-1 | R1.5 | Procedures for reviewing access authorization requests and revocation of access authorization, in accordance with CIP-004 Requirement R4. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not include procedures for reviewing access authorization requests or does not include revocation of access |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | authorization, in accordance with CIP- 004 Requirement R4. |
| CIP-006-1 | R1.6 | Procedures for escorted access within the physical security perimeter of personnel not authorized for unescorted access. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not include procedures for escorted access within the physical security perimeter. |
| CIP-006-1 | R1.7 | Process for updating the physical security plan within ninety calendar days of any physical security system redesign or reconfiguration, including, but not limited to, addition or removal of access points through the physical security perimeter, physical access controls, monitoring controls, or logging controls. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not include a process for updating the physical security plan within ninety calendar days of any physical security system redesign or reconfiguration. OR The plan was not updated within 90 calendar days of any physical security system redesign or reconfiguration. |
| CIP-006-1 | R1.8 | Cyber Assets used in the access control and monitoring of the Physical Security Perimeter(s) shall be afforded the protective measures specified in Standard CIP-003, Standard CIP-004 Requirement R3, | N/A | N/A | N/A | A Cyber Asset used in the access control and monitoring of the Physical Security Perimeter(s) is not afforded one (1) or more of the protective measures specified in |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | Standard CIP-005 Requirements R2 and R3, Standard CIP-006 Requirement R2 and R3, Standard CIP-007, Standard CIP-008 and Standard CIP- 009. | | | | Standard CIP-003, Standard CIP-004 Requirement R3, Standard CIP-005 Requirements R2 and R3, Standard CIP- 006 Requirements R2 and R3, Standard CIP-007, Standard CIP-008, and Standard CIP-009. |
| CIP-006-1 | R1.9 | Process for ensuring that the physical security plan is reviewed at least annually. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not include a process for ensuring that the physical security plan is reviewed at least annually. |
| CIP-006-1 | R2 | Physical Access Controls — The Responsible Entity shall document and implement the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. The Responsible Entity shall implement one or more of the following physical access methods: | N/A | N/A | N/A | The Responsible Entity has not documented, or has not implemented the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty- four hours a day, seven days a week using at least one of the access control methods identified in R2.1, R2.2, R2.3, or R2.4. |
| CIP-006-1 | R2.1. | Card Key: A means of electronic access where the access rights of the card | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | holder are predefined in a computer database. Access rights may differ from one perimeter to another. | | | | |
| CIP-006-1 | R2.2. | Special Locks: These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. | N/A | N/A | N/A | N/A |
| CIP-006-1 | R2.3. | Security Personnel: Personnel responsible for controlling physical access who may reside on-site or at a monitoring station. | N/A | N/A | N/A | N/A |
| CIP-006-1 | R2.4. | Other Authentication Devices: Biometric, keypad, token, or other equivalent devices that control physical access to the Critical Cyber Assets. | N/A | N/A | N/A | N/A |
| CIP-006-1 | R3 | Monitoring Physical Access — The Responsible Entity shall document and implement the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. Unauthorized access attempts shall be reviewed immediately and handled in accordance with the | N/A | N/A | N/A | The Responsible Entity has not documented or has not implemented the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week using at least one of the monitoring methods identified in |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | procedures specified in Requirement CIP-008. One or more of the following monitoring methods shall be used: | | | | Requirements R3.1 or R3.2. OR One or more unauthorized access attempts have not been reviewed immediately and handled in accordance with the procedures specified in CIP-008. |
| CIP-006-1 | R3.1. | Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel responsible for response. | N/A | N/A | N/A | N/A |
| CIP-006-1 | R3.2. | Human Observation of Access Points: Monitoring of physical access points by authorized personnel as specified in Requirement R2.3. | N/A | N/A | N/A | N/A |
| CIP-006-1 | R4 | Logging Physical Access — Logging shall record sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. The Responsible Entity shall implement and document the technical and procedural | N/A | N/A | N/A | The Responsible Entity has not implemented or has not documented the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: | | | | the logging methods identified in Requirements R4.1, R4.2, or R4.3 or has not recorded sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. |
| CIP-006-1 | R4.1. | Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method. | N/A | N/A | N/A | N/A |
| CIP-006-1 | R4.2. | Video Recording: Electronic capture of video images of sufficient quality to determine identity. | N/A | N/A | N/A | N/A |
| CIP-006-1 | R4.3. | Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R2.3. | N/A | N/A | N/A | N/A |
| CIP-006-1 | R5 | Access Log Retention — The responsible entity shall retain physical access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard | The Responsible Entity retained physical access logs for 75 or more calendar days, but for less than 90 calendar days. | The Responsible Entity retained physical access logs for 60 or more calendar days, but for less than 75 calendar days. | The Responsible Entity retained physical access logs for 45 or more calendar days , but for less than 60 calendar days. | The Responsible Entity retained physical access logs for less than 45 calendar days. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | CIP-008. | | | | |
| CIP-006-1 | R6 | Maintenance and Testing — The Responsible Entity shall implement a maintenance and testing program to ensure that all physical security systems under Requirements R2, R3, and R4 function properly. The program must include, at a minimum, the following: | N/A | N/A | N/A | The Responsible Entity has not implemented a maintenance and testing program to ensure that all physical security systems under Requirements R2, R3, and R4 function properly. OR The implemented program does not include one or more of the requirements; R6.1, R6.2, and R6.3. |
| CIP-006-1 | R6.1. | Testing and maintenance of all physical security mechanisms on a cycle no longer than three years. | N/A | N/A | N/A | N/A |
| CIP-006-1 | R6.2. | Retention of testing and maintenance records for the cycle determined by the Responsible Entity in Requirement R6.1. | N/A | N/A | N/A | N/A |
| CIP-006-1 | R6.3. | Retention of outage records regarding access controls, logging, and monitoring for a minimum of one calendar year. | N/A | N/A | N/A | N/A |
| CIP-007-1 | R1. | Test Procedures — The Responsible Entity shall ensure that new Cyber Assets and significant | N/A | N/A | N/A | The Responsible Entity did not ensure the prevention of adverse affects described in R1, |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | changes to existing Cyber Assets within the Electronic Security Perimeter do not adversely affect existing cyber security controls. For purposes of Standard CIP- 007, a significant change shall, at a minimum, include implementation of security patches, cumulative service packs, vendor releases, and version upgrades of operating systems, applications, database platforms, or other third- party software or firmware. | | | | by not including the required minimum significant changes. OR The Responsible Entity did not address one or more of the following: R1.1, R1.2, R1.3. |
| CIP-007-1 | R1.1. | The Responsible Entity shall create, implement, and maintain cyber security test procedures in a manner that minimizes adverse effects on the production system or its operation. | N/A | N/A | N/A | N/A |
| CIP-007-1 | R1.2. | The Responsible Entity shall document that testing is performed in a manner that reflects the production environment. | N/A | N/A | N/A | N/A |
| CIP-007-1 | R1.3. | The Responsible Entity shall document test results. | N/A | N/A | N/A | N/A |
| CIP-007-1 | R2. | Ports and Services — The Responsible Entity shall establish and document a process to ensure that only those ports and services | N/A | N/A | N/A | The Responsible Entity did not establish or did not document a process to ensure that only those ports and |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | required for normal and emergency operations are enabled. | | | | services required for normal and emergency operations are enabled. |
| CIP-007-1 | R2.1. | The Responsible Entity shall enable only those ports and services required for normal and emergency operations. | N/A | N/A | N/A | The Responsible Entity enabled one or more ports or services not required for normal and emergency operations on Cyber Assets inside the Electronic Security Perimeter(s). |
| CIP-007-1 | R2.2. | The Responsible Entity shall disable other ports and services, including those used for testing purposes, prior to production use of all Cyber Assets inside the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not disable one or more other ports or services, including those used for testing purposes, prior to production use for Cyber Assets inside the Electronic Security Perimeter(s). |
| CIP-007-1 | R2.3. | In the case where unused ports and services cannot be disabled due to technical limitations, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure or an acceptance of risk. | N/A | N/A | N/A | For cases where unused ports and services cannot be disabled due to technical limitations, the Responsible Entity did not document compensating measure(s) applied to mitigate risk exposure or state an acceptance of risk. |
| CIP-007-1 | R3. | Security Patch Management — The Responsible Entity, either separately or as a | N/A | N/A | N/A | The Responsible Entity did not establish or did not document, either |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | component of the documented configuration management process specified in CIP-003 Requirement R6, shall establish and document a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | | | | separately or as a component of the documented configuration management process specified in CIP-003 Requirement R6, a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). |
| CIP-007-1 | R3.1. | The Responsible Entity shall document the assessment of security patches and security upgrades for applicability within thirty calendar days of availability of the patches or upgrades. | N/A | N/A | N/A | The Responsible Entity did not document the assessment of security patches and security upgrades for applicability as required in Requirement R3 within 30 calendar days after the availability of the patches and upgrades. |
| CIP-007-1 | R3.2. | The Responsible Entity shall document the implementation of security patches. In any case where the patch is not installed, the Responsible Entity shall document compensating measure(s) applied to | N/A | N/A | N/A | The Responsible Entity did not document the implementation of applicable security patches as required in R3. OR Where an applicable |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | mitigate risk exposure or an acceptance of risk. | | | | patch was not installed, the Responsible Entity did not document the compensating measure(s) applied to mitigate risk exposure or an acceptance of risk. |
| CIP-007-1 | R4. | Malicious Software Prevention — The Responsible Entity shall use anti-virus software and other malicious software ("malware") prevention tools, where technically feasible, to detect, prevent, deter, and mitigate the introduction, exposure, and propagation of malware on all Cyber Assets within the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity, where technically feasible, did not use anti-virus software or other malicious software ("malware") prevention tools, on <u>one</u> or more Cyber Assets within the Electronic Security Perimeter(s). |
| CIP-007-1 | R4.1. | The Responsible Entity shall document and implement anti-virus and malware prevention tools. In the case where anti-virus software and malware prevention tools are not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure or an acceptance of risk. | N/A | N/A | N/A | The Responsible Entity did not document the implementation of antivirus and malware prevention tools for cyber assets within the electronic security perimeter. OR The Responsible Entity did not document the implementation of compensating |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | measure(s) applied to mitigate risk exposure or an acceptance of risk where antivirus and malware prevention tools are not installed. |
| CIP-007-1 | R4.2. | The Responsible Entity shall document and implement a process for the update of anti-virus and malware prevention "signatures." The process must address testing and installing the signatures. | N/A | N/A | N/A | The Responsible Entity did not document or did not implement a process including addressing testing and installing the signatures for the update of anti- virus and malware prevention "signatures." |
| CIP-007-1 | R5. | Account Management — The Responsible Entity shall establish, implement, and document technical and procedural controls that enforce access authentication of, and accountability for, all user activity, and that minimize the risk of unauthorized system access. | N/A | N/A | N/A | The Responsible Entity did not document or did not implement technical and procedural controls that enforce access authentication of, and accountability for, all user activity. |
| CIP-007-1 | R5.1. | The Responsible Entity shall ensure that individual and shared system accounts and authorized access permissions are consistent with the concept of "need to know" with respect to work functions performed. | N/A | N/A | N/A | The Responsible Entity did not ensure that individual and shared system accounts and authorized access permissions are consistent with the concept of "need to know" with respect to |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | work functions performed. |
| CIP-007-1 | R5.1.1. | The Responsible Entity shall ensure that user accounts are implemented as approved by designated personnel. Refer to Standard CIP-003 Requirement R5. | N/A | N/A | N/A | One or more user accounts implemented by the Responsible Entity were not implemented as approved by designated personnel. |
| CIP-007-1 | R5.1.2. | The Responsible Entity shall establish methods, processes, and procedures that generate logs of sufficient detail to create historical audit trails of individual user account access activity for a minimum of ninety days. | N/A | The Responsible Entity generated logs with sufficient detail to create historical audit trails of individual user account access activity, however the logs do not contain activity for a minimum of 90 days. | The Responsible Entity generated logs with insufficient detail to create historical audit trails of individual user account access activity. | The Responsible Entity did not generate logs of individual user account access activity. |
| CIP-007-1 | R5.1.3. | The Responsible Entity shall review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003 Requirement R5 and Standard CIP-004 Requirement R4. | N/A | N/A | N/A | The Responsible Entity did not review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003 Requirement R5 and Standard CIP-004 Requirement R4. |
| CIP-007-1 | R5.2. | The Responsible Entity shall implement a policy to minimize and manage the scope and acceptable use of administrator, shared, and | N/A | N/A | N/A | The Responsible Entity did not implement a policy to minimize and manage the scope and acceptable use of |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | other generic account privileges including factory default accounts. | | | | administrator, shared, and other generic account privileges including factory default accounts. |
| CIP-007-1 | R5.2.1. | The policy shall include the removal, disabling, or renaming of such accounts where possible. For such accounts that must remain enabled, passwords shall be changed prior to putting any system into service. | N/A | N/A | The Responsible Entity's policy did not include the removal, disabling, or renaming of such accounts where possible, however for accounts that must remain enabled, passwords were changed prior to putting any system into service. | For accounts that must remain enabled, the Responsible Entity did not change passwords prior to putting any system into service. |
| CIP-007-1 | R5.2.2. | The Responsible Entity shall identify those individuals with access to shared accounts. | N/A | N/A | N/A | The Responsible Entity did not identify all individuals with access to shared accounts. |
| CIP-007-1 | R5.2.3. | Where such accounts must be shared, the Responsible Entity shall have a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps for securing the account in the event of personnel changes (for example, change in | N/A | N/A | N/A | Where such accounts must be shared, the Responsible Entity has not implemented (one or more components of) a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps for securing |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | assignment or termination). | | | | the account in the event of personnel changes (for example, change in assignment or termination). |
| CIP-007-1 | R5.3. | At a minimum, the Responsible Entity shall require and use passwords, subject to the following, as technically feasible: | N/A | N/A | N/A | The Responsible Entity does not require passwords subject to R5.3.1, R5.3.2, R5.3.3. OR Does not use passwords subject to R5.3.1, R5.3.2, R5.3.3. |
| CIP-007-1 | R5.3.1. | Each password shall be a minimum of six characters. | N/A | N/A | N/A | N/A |
| CIP-007-1 | R5.3.2. | Each password shall consist of a combination of alpha, numeric, and "special" characters. | N/A | N/A | N/A | N/A |
| CIP-007-1 | R5.3.3. | Each password shall be changed at least annually, or more frequently based on risk. | N/A | N/A | N/A | N/A |
| CIP-007-1 | R6. | Security Status Monitoring — The Responsible Entity shall ensure that all Cyber Assets within the Electronic Security Perimeter, as technically feasible, implement automated tools or organizational process controls to monitor system events that are related to cyber security. | N/A | N/A | N/A | The Responsible Entity as technically feasible, did not implement automated tools or organizational process controls, to monitor system events that are related to cyber security on one or more of Cyber Assets inside the Electronic Security |

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| | | | | | | Perimeter(s). |
| CIP-007-1 | R6.1. | The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter. |
| CIP-007-1 | R6.2. | The security monitoring controls shall issue automated or manual alerts for detected Cyber Security Incidents. | N/A | N/A | N/A | The Responsible entity's security monitoring controls do not issue automated or manual alerts for detected Cyber Security Incidents. |
| CIP-007-1 | R6.3. | The Responsible Entity shall maintain logs of system events related to cyber security, where technically feasible, to support incident response as required in Standard CIP-008. | N/A | N/A | N/A | The Responsible Entity did not maintain logs of system events related to cyber security, where technically feasible, to support incident response as required in Standard CIP-008. |
| CIP-007-1 | R6.4. | The Responsible Entity shall retain all logs specified in Requirement R6 for ninety calendar days. | N/A | N/A | N/A | The Responsible Entity did not retain one or more of the logs specified in Requirement R6 for at least 90 calendar days. |
| CIP-007-1 | R6.5. | The Responsible Entity shall | N/A | N/A | N/A | The Responsible Entity |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | review logs of system events related to cyber security and maintain records documenting review of logs. | | | | did not review logs of system events related to cyber security nor maintain records documenting review of logs. |
| CIP-007-1 | R7. | Disposal or Redeployment — The Responsible Entity shall establish formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005. | N/A | N/A | The Responsible Entity established formal methods, processes, and procedures for redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005 but did not address redeployment as specified in R7.2. | The Responsible Entity did not establish formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005. OR The Responsible Entity established formal methods, processes, and procedures for redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005 but did not address disposal as specified in R7.1. OR Did not maintain records pertaining to disposal or |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | redeployment as specified in R7.3. |
| CIP-007-1 | R7.1. | Prior to the disposal of such assets, the Responsible Entity shall destroy or erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | N/A | N/A | N/A | N/A |
| CIP-007-1 | R7.2. | Prior to redeployment of such assets, the Responsible Entity shall, at a minimum, erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | N/A | N/A | N/A | N/A |
| CIP-007-1 | R7.3. | The Responsible Entity shall maintain records that such assets were disposed of or redeployed in accordance with documented procedures. | N/A | N/A | N/A | N/A |
| CIP-007-1 | R8 | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of all Cyber Assets within the Electronic Security Perimeter at least annually. The vulnerability assessment shall include, at a minimum, the following: | N/A | N/A | N/A | The Responsible Entity did not perform a Vulnerability Assessment on one or more Cyber Assets within the Electronic Security Perimeter at least annually. OR The vulnerability assessment did not include one (1) or more of the subrequirements |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | 8.1, 8.2, 8.3, 8.4. |
| CIP-007-1 | R8.1. | A document identifying the vulnerability assessment process; | N/A | N/A | N/A | N/A |
| CIP-007-1 | R8.2. | A review to verify that only ports and services required for operation of the Cyber Assets within the Electronic Security Perimeter are enabled; | N/A | N/A | N/A | N/A |
| CIP-007-1 | R8.3. | A review of controls for default accounts; and, | N/A | N/A | N/A | N/A |
| CIP-007-1 | R8.4. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | N/A | N/A | N/A | N/A |
| CIP-007-1 | R9 | Documentation Review and Maintenance — The Responsible Entity shall review and update the documentation specified in Standard CIP-007 at least annually. Changes resulting from modifications to the systems or controls shall be documented within ninety calendar days of the change. | N/A | N/A | The Responsible Entity did not review and update the documentation specified in Standard CIP-007 at least annually or the Responsible Entity did not document Changes resulting from modifications to the systems or controls within ninety calendar days of the change. | The Responsible Entity did not review and update the documentation specified in Standard CIP-007 at least annually nor were Changes resulting from modifications to the systems or controls documented within ninety calendar days of the change. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-008-1 | R1. | Cyber Security Incident Response Plan — The Responsible Entity shall develop and maintain a Cyber Security Incident response plan. The Cyber Security Incident Response plan shall address, at a minimum, the following: | N/A | N/A | The Responsible Entity has developed a Cyber Security Incident response plan that addresses all of the components required by R1.1 through R1.6 but has not maintained the plan in accordance with R1.4 or R1.5. | The Responsible Entity has not developed a Cyber Security Incident response plan that addresses all components of the sub- requirements R1.1 through R1.6. |
| CIP-008-1 | R1.1. | Procedures to characterize and classify events as reportable Cyber Security Incidents. | N/A | N/A | N/A | N/A |
| CIP-008-1 | R1.2. | Response actions, including roles and responsibilities of incident response teams, incident handling procedures, and communication plans. | N/A | N/A | N/A | N/A |
| CIP-008-1 | R1.3. | Process for reporting Cyber Security Incidents to the Electricity Sector Information Sharing and Analysis Center (ES ISAC). The Responsible Entity must ensure that all reportable Cyber Security Incidents are reported to the ES ISAC either directly or through an intermediary. | N/A | N/A | N/A | N/A |
| CIP-008-1 | R1.4. | Process for updating the Cyber Security Incident response plan within ninety | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | calendar days of any changes. | | | | |
| CIP-008-1 | R1.5. | Process for ensuring that the Cyber Security Incident response plan is reviewed at least annually. | N/A | N/A | N/A | N/A |
| CIP-008-1 | R1.6. | Process for ensuring the Cyber Security Incident response plan is tested at least annually. A test of the incident response plan can range from a paper drill, to a full operational exercise, to the response to an actual incident. | N/A | N/A | N/A | N/A |
| CIP-008-1 | R2 | Cyber Security Incident Documentation — The Responsible Entity shall keep relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 for three calendar years. | N/A | N/A | N/A | The Responsible Entity has not kept relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 for at least three calendar years. |
| CIP-009-1 | R1 | Recovery Plans — The Responsible Entity shall create and annually review recovery plan(s) for Critical Cyber Assets. The recovery plan(s) shall address at a minimum the following: | N/A | N/A | N/A | The Responsible Entity has not created or has not annually reviewed their recovery plan(s) for Critical Cyber Assets OR has created a plan but did not address one or more of the requirements CIP- 009- 1 R1.1 and R1.2. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-009-1 | R1.1. | Specify the required actions in response to events or conditions of varying duration and severity that would activate the recovery plan(s). | N/A | N/A | N/A | N/A |
| CIP-009-1 | R1.2. | Define the roles and responsibilities of responders. | N/A | N/A | N/A | N/A |
| CIP-009-1 | R2 | Exercises — The recovery plan(s) shall be exercised at least annually. An exercise of the recovery plan(s) can range from a paper drill, to a full operational exercise, to recovery from an actual incident. | N/A | N/A | N/A | The Responsible Entity's recovery plan(s) have not been exercised at least annually. |
| CIP-009-1 | R3 | Change Control — Recovery plan(s) shall be updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. Updates shall be communicated to personnel responsible for the activation and implementation of the recovery plan(s) within ninety calendar days of the change. | N/A | N/A | N/A | The Responsible Entity's recovery plan(s) have not been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. OR The Responsible Entity's recovery plan(s) have been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident but the updates were not communicated to |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | personnel responsible for the activation and implementation of the recovery plan(s) within 90 calendar days of the change. |
| CIP-009-1 | R4 | Backup and Restore — The recovery plan(s) shall include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. For example, backups may include spare electronic components or equipment, written documentation of configuration settings, tape backup, etc. | N/A | N/A | N/A | The Responsible Entity's recovery plan(s) do not include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. |
| CIP-009-1 | R5 | Testing Backup Media — Information essential to recovery that is stored on backup media shall be tested at least annually to ensure that the information is available. Testing can be completed off site. | N/A | N/A | N/A | The Responsible Entity's information essential to recovery that is stored on backup media has not been tested at least annually to ensure that the information is available. |

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| CIP-001-1 | R1 | Critical Asset Identification Method — The Responsible Entity shall identify and document a risk-based assessment methodology to use to identify its Critical Assets. | MEDIUM |
| CIP-001-1 | R2 | The Responsible Entity shall maintain documentation describing its risk-based assessment methodology that includes procedures and evaluation criteria. | MEDIUM |
| CIP-001-1 | R3 | The risk-based assessment shall consider the following assets: | MEDIUM |
| CIP-001-1 | R4 | Control centers and backup control centers performing the functions of the entities listed in the Applicability section of this standard. | MEDIUM |
| CIP-002-1 | R1. | Transmission substations that support the reliable operation of the Bulk Electric System. | MEDIUM |
| CIP-002-1 | R1.1 | Generation resources that support the reliable operation of the Bulk Electric System. | LOWER |
| CIP-002-1 | R1.2 | Systems and facilities critical to system restoration, including blackstart generators and substations in the electrical path of transmission lines used for initial system restoration. | MEDIUM |
| CIP-002-1 | R1.2.1. | Systems and facilities critical to automatic load shedding under a common control system capable of shedding 300 MW or more. | LOWER |
| CIP-002-1 | R1.2.2. | Special Protection Systems that support the reliable operation of the Bulk Electric System. | LOWER |
| CIP-002-1 | R1.2.3. | Any additional assets that support the reliable operation of the Bulk Electric System that the Responsible Entity deems appropriate to include in its assessment. | LOWER |
| CIP-002-1 | R1.2.4. | Critical Asset Identification — The Responsible Entity shall develop a list of its identified Critical Assets determined through an annual application of the risk-based assessment methodology required in R1. The Responsible Entity shall review this list at least annually, and update it as necessary. | LOWER |
| CIP-002-1 | R1.2.5. | Critical Cyber Asset Identification — Using the list of Critical | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| | | Assets developed pursuant to Requirement R2, the Responsible Entity shall develop a list of associated Critical Cyber Assets essential to the operation of the Critical Asset. Examples at control centers and backup control centers include systems and facilities at master and remote sites that provide monitoring and control, automatic generation control, real-time power system modeling, and real-time inter utility data exchange. The Responsible Entity shall review this list at least annually, and update it as necessary. For the purpose of Standard CIP-002, Critical Cyber Assets are further qualified to be those having at least one of the following characteristics: | |
| CIP-002-1 | R1.2.6. | The Cyber Asset uses a routable protocol to communicate outside the Electronic Security Perimeter; or, | LOWER |
| CIP-002-1 | R1.2.7. | The Cyber Asset uses a routable protocol within a control center; or, | LOWER |
| CIP-002-1 | R2. | The Cyber Asset is dial-up accessible. | HIGH |
| CIP-002-1 | R3. | Annual Approval — A senior manager or delegate(s) shall approve annually the list of Critical Assets and the list of Critical Cyber Assets. Based on Requirements R1, R2, and R3 the Responsible Entity may determine that it has no Critical Assets or Critical Cyber Assets. The Responsible Entity shall keep a signed and dated record of the senior manager or delegate(s)'s approval of the list of Critical Assets and the list of Critical Cyber Assets (even if such lists are null.) | HIGH |
| CIP-002-1 | R3.1 | Cyber Security Policy — The Responsible Entity shall document and implement a cyber security policy that represents management's commitment and ability to secure its Critical Cyber Assets. The Responsible Entity shall, at minimum, ensure the following: | LOWER |
| CIP-002-1 | R3.2. | The cyber security policy addresses the requirements in Standards CIP-002 through CIP-009, including provision for emergency situations. | LOWER |
| CIP-002-1 | R3.3. | The cyber security policy is readily available to all personnel who have access to, or are responsible for, Critical Cyber | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| | | Assets. | |
| CIP-002-1 | R4. | Annual review and approval of the cyber security policy by the senior manager assigned pursuant to R2. | LOWER |
| CIP-003-1 | R1. | Leadership — The Responsible Entity shall assign a senior manager with overall responsibility for leading and managing the entity's implementation of, and adherence to, Standards CIP-002 through CIP-009. | MEDIUM |
| CIP-003-1 | R1.1. | The senior manager shall be identified by name, title, business phone, business address, and date of designation. | LOWER |
| CIP-003-1 | R1.2. | Changes to the senior manager must be documented within thirty calendar days of the effective date. | LOWER |
| CIP-003-1 | R1.3 | The senior manager or delegate(s), shall authorize and document any exception from the requirements of the cyber security policy. | LOWER |
| CIP-003-1 | R2. | Exceptions — Instances where the Responsible Entity cannot conform to its cyber security policy must be documented as exceptions and authorized by the senior manager or delegate(s). | MEDIUM |
| CIP-003-1 | R2.1. | Exceptions to the Responsible Entity's cyber security policy must be documented within thirty days of being approved by the senior manager or delegate(s). | LOWER |
| CIP-003-1 | R2.2. | Documented exceptions to the cyber security policy must include an explanation as to why the exception is necessary and any compensating measures, or a statement accepting risk. | LOWER |
| CIP-003-1 | R2.3. | Authorized exceptions to the cyber security policy must be reviewed and approved annually by the senior manager or delegate(s) to ensure the exceptions are still required and valid. Such review and approval shall be documented. | LOWER |
| CIP-003-1 | R3. | Information Protection — The Responsible Entity shall implement and document a program to identify, classify, and protect information associated with Critical Cyber Assets. | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-003-1 | R3.1. | The Critical Cyber Asset information to be protected shall include, at a minimum and regardless of media type, operational procedures, lists as required in Standard CIP- 002, network topology or similar diagrams, floor plans of computing centers that contain Critical Cyber Assets, equipment layouts of Critical Cyber Assets, disaster recovery plans, incident response plans, and security configuration information. | LOWER |
| CIP-003-1 | R3.2. | The Responsible Entity shall classify information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. | LOWER |
| CIP-003-1 | R3.3. | The Responsible Entity shall, at least annually, assess adherence to its Critical Cyber Asset information protection program, document the assessment results, and implement an action plan to remediate deficiencies identified during the assessment. | LOWER |
| CIP-003-1 | R4. | Access Control — The Responsible Entity shall document and implement a program for managing access to protected Critical Cyber Asset information. | MEDIUM |
| CIP-003-1 | R4.1. | The Responsible Entity shall maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information. | MEDIUM |
| CIP-003-1 | R4.2. | Personnel shall be identified by name, title, business phone and the information for which they are responsible for authorizing access. | LOWER |
| CIP-003-1 | R4.3. | The list of personnel responsible for authorizing access to protected information shall be verified at least annually. | LOWER |
| CIP-003-1 | R5. | The Responsible Entity shall review at least annually the access privileges to protected information to confirm that access privileges are correct and that they correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities. | LOWER |
| CIP-003-1 | R5.1. | The Responsible Entity shall assess and document at least | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|-------|
| | | annually the processes for controlling access privileges to protected information. | |
| CIP-003-1 | R5.1.1. | Change Control and Configuration Management — The Responsible Entity shall establish and document a process of change control and configuration management for adding, modifying, replacing, or removing Critical Cyber Asset hardware or software, and implement supporting configuration management activities to identify, control and document all entity or vendor related changes to hardware and software components of Critical Cyber Assets pursuant to the change control process. | LOWER |
| CIP-003-1 | R5.1.2. | Awareness — The Responsible Entity shall establish, maintain, and document a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access receive on-going reinforcement in sound security practices. The program shall include security awareness reinforcement on at least a quarterly basis using mechanisms such as: | LOWER |
| | | 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.). | |
| CIP-003-1 | R5.2. | Training — The Responsible Entity shall establish, maintain, and document an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets, and review the program annually and update as necessary. | LOWER |
| CIP-003-1 | R5.3. | This program will ensure that all personnel having such access to Critical Cyber Assets, including contractors and service vendors, are trained within ninety calendar days of such authorization. | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| CIP-003-1 | R6. | Training shall cover the policies, access controls, and procedures as developed for the Critical Cyber Assets covered by CIP-004, and include, at a minimum, the following required items appropriate to personnel roles and responsibilities: | LOWER |
| CIP-004-1 | R1. | The proper use of Critical Cyber Assets; | LOWER |
| CIP-004-1 | R2. | Physical and electronic access controls to Critical Cyber Assets; | LOWER |
| CIP-004-1 | R2.1. | The proper handling of Critical Cyber Asset information; and, | MEDIUM |
| CIP-004-1 | R2.2. | Action plans and procedures to recover or re-establish Critical Cyber Assets and access thereto following a Cyber Security Incident. | MEDIUM |
| CIP-004-1 | R2.2.1. | The Responsible Entity shall maintain documentation that training is conducted at least annually, including the date the training was completed and attendance records. | LOWER |
| CIP-004-1 | R2.2.2. | Personnel Risk Assessment —The Responsible Entity shall have a documented personnel risk assessment program, in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements, for personnel having authorized cyber or authorized unescorted physical access. A personnel risk assessment shall be conducted pursuant to that program within thirty days of such personnel being granted such access. Such program shall at a minimum include: | LOWER |
| CIP-004-1 | R2.2.3. | The Responsible Entity shall ensure that each assessment conducted include, at least, identity verification (e.g., Social Security Number verification in the U.S.) and seven year criminal check. The Responsible Entity may conduct more detailed reviews, as permitted by law and subject to existing collective bargaining unit agreements, depending upon the criticality of the position. | LOWER |
| CIP-004-1 | R2.2.4. | The Responsible Entity shall update each personnel risk assessment at least every seven years after the initial | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| | | personnel risk assessment or for cause. | |
| CIP-004-1 | R2.3. | The Responsible Entity shall document the results of personnel risk assessments of its personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets, and that personnel risk assessments of contractor and service vendor personnel with such access are conducted pursuant to Standard CIP-004. | LOWER |
| CIP-004-1 | R3. | Access — The Responsible Entity shall maintain list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets. | MEDIUM |
| CIP-004-1 | R3.1. | The Responsible Entity shall review the list(s) of its personnel who have such access to Critical Cyber Assets quarterly, and update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, or any change in the access rights of such personnel. The Responsible Entity shall ensure access list(s) for contractors and service vendors are properly maintained. | LOWER |
| CIP-004-1 | R3.2. | The Responsible Entity shall revoke such access to Critical Cyber Assets within 24 hours for personnel terminated for cause and within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. | LOWER |
| CIP-004-1 | R3.3. | Electronic Security Perimeter — The Responsible Entity shall ensure that every Critical Cyber Asset resides within an Electronic Security Perimeter. The Responsible Entity shall identify and document the Electronic Security Perimeter(s) and all access points to the perimeter(s). | LOWER |
| CIP-004-1 | R4. | Access points to the Electronic Security Perimeter(s) shall include any externally connected communication end point (for example, dial-up modems) terminating at any device within the Electronic Security Perimeter(s). | LOWER |
| CIP-004-1 | R4.1. | For a dial-up accessible Critical Cyber Asset that uses a non- routable protocol, the Responsible Entity shall define an | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| | | Electronic Security Perimeter for that single access point at the dial-up device. | |
| CIP-004-1 | R4.2. | Communication links connecting discrete Electronic Security Perimeters shall not be considered part of the Electronic Security Perimeter. However, end points of these communication links within the Electronic Security Perimeter(s) shall be considered access points to the Electronic Security Perimeter(s). | LOWER |
| CIP-005-1 | R1. | Any non-critical Cyber Asset within a defined Electronic Security Perimeter shall be identified and protected pursuant to the requirements of Standard CIP-005. | MEDIUM |
| CIP-005-1 | R1.1. | Cyber Assets used in the access control and monitoring of the Electronic Security Perimeter(s) shall be afforded the protective measures as a specified in Standard CIP-003, Standard CIP-004 Requirement R3, Standard CIP-005 Requirements R2 and R3, Standard CIP-006 Requirements R2 and R3, Standard CIP-007, Requirements R1 and R3 through R9, Standard CIP-008, and Standard CIP-009. | MEDIUM |
| CIP-005-1 | R1.2. | The Responsible Entity shall maintain documentation of Electronic Security Perimeter(s), all interconnected Critical and non-critical Cyber Assets within the Electronic Security Perimeter(s), all electronic access points to the Electronic Security Perimeter(s) and the Cyber Assets deployed for the access control and monitoring of these access points. | MEDIUM |
| CIP-005-1 | R1.3. | Electronic Access Controls — The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s). | MEDIUM |
| CIP-005-1 | R1.4. | These processes and mechanisms shall use an access control model that denies access by default, such that explicit access permissions must be specified. | MEDIUM |
| CIP-005-1 | R1.5. | At all access points to the Electronic Security Perimeter(s), the Responsible Entity shall enable only ports and services | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| | | required for operations and for monitoring Cyber Assets within the Electronic Security Perimeter, and shall document, individually or by specified grouping, the configuration of those ports and services. | |
| CIP-005-1 | R1.6. | The Responsible Entity shall maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s). | LOWER |
| CIP-005-1 | R2. | Where external interactive access into the Electronic Security Perimeter has been enabled, the Responsible Entity shall implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible. | MEDIUM |
| CIP-005-1 | R2.1. | The required documentation shall, at least, identify and describe: | MEDIUM |
| CIP-005-1 | R2.2. | The processes for access request and authorization. | MEDIUM |
| CIP-005-1 | R2.3. | The authentication methods. | MEDIUM |
| CIP-005-1 | R2.4. | The review process for authorization rights, in accordance with Standard CIP-004 Requirement R4. | MEDIUM |
| CIP-005-1 | R2.5. | The controls used to secure dial-up accessible connections. | LOWER |
| CIP-005-1 | R2.5.1. | Appropriate Use Banner — Where technically feasible, electronic access control devices shall display an appropriate use banner on the user screen upon all interactive access attempts. The Responsible Entity shall maintain a document identifying the content of the banner. | LOWER |
| CIP-005-1 | R2.5.2. | Monitoring Electronic Access — The Responsible Entity shall implement and document an electronic or manual process(es) for monitoring and logging access at access points to the Electronic Security Perimeter(s) twenty-four hours a day, seven days a week. | LOWER |
| CIP-005-1 | R2.5.3. | For dial-up accessible Critical Cyber Assets that use non- routable protocols, the Responsible Entity shall implement and document monitoring process(es) at each access point | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| | | to the dial-up device, where technically feasible. | |
| CIP-005-1 | R2.5.4. | Where technically feasible, the security monitoring process(es) shall detect and alert for attempts at or actual unauthorized accesses. These alerts shall provide for appropriate notification to designated response personnel. Where alerting is not technically feasible, the Responsible Entity shall review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. | LOWER |
| CIP-005-1 | R2.6. | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of the electronic access points to the Electronic Security Perimeter(s) at least annually. The vulnerability assessment shall include, at a minimum, the following: | LOWER |
| CIP-005-1 | R3. | A document identifying the vulnerability assessment process; | MEDIUM |
| CIP-005-1 | R3.1. | A review to verify that only ports and services required for operations at these access points are enabled; | MEDIUM |
| CIP-005-1 | R3.2. | The discovery of all access points to the Electronic Security Perimeter; | MEDIUM |
| CIP-005-1 | R4. | A review of controls for default accounts, passwords, and network management community strings; and, | MEDIUM |
| CIP-005-1 | R4.1. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | LOWER |
| CIP-005-1 | R4.2. | Documentation Review and Maintenance — The Responsible Entity shall review, update, and maintain all documentation to support compliance with the requirements of Standard CIP-005. | MEDIUM |
| CIP-005-1 | R4.3. | The Responsible Entity shall ensure that all documentation required by Standard CIP-005 reflect current configurations and processes and shall review the documents and procedures referenced in Standard CIP-005 at least annually. | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-005-1 | R4.4. | The Responsible Entity shall update the documentation to reflect the modification of the network or controls within ninety calendar days of the change. | MEDIUM |
| CIP-005-1 | R4.5. | The Responsible Entity shall retain electronic access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008. | MEDIUM |
| CIP-005-1 | R5. | Physical Security Plan — The Responsible Entity shall create and maintain a physical security plan, approved by a senior manager or delegate(s) that shall address, at a minimum, the following: | LOWER |
| CIP-005-1 | R5.1. | Processes to ensure and document that all Cyber Assets within an Electronic Security Perimeter also reside within an identified Physical Security Perimeter. Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity shall deploy and document alternative measures to control physical access to the Critical Cyber Assets. | LOWER |
| CIP-005-1 | R5.2. | Processes to identify all access points through each Physical Security Perimeter and measures to control entry at those access points. | LOWER |
| CIP-005-1 | R5.3. | Processes, tools, and procedures to monitor physical access to the perimeter(s). | LOWER |
| CIP-006-1 | R1. | Procedures for the appropriate use of physical access controls as described in Requirement R3 including visitor pass management, response to loss, and prohibition of inappropriate use of physical access controls. | MEDIUM |
| CIP-006-1 | R1.1. | Procedures for reviewing access authorization requests and revocation of access authorization, in accordance with CIP-004 Requirement R4. | MEDIUM |
| CIP-006-1 | R1.2. | Procedures for escorted access within the physical security perimeter of personnel not authorized for unescorted | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| | | access. | |
| CIP-006-1 | R1.3 | Process for updating the physical security plan within ninety calendar days of any physical security system redesign or reconfiguration, including, but not limited to, addition or removal of access points through the physical security perimeter, physical access controls, monitoring controls, or logging controls. | MEDIUM |
| CIP-006-1 | R1.4 | Cyber Assets used in the access control and monitoring of the Physical Security Perimeter(s) shall be afforded the protective measures specified in Standard CIP-003, Standard CIP-004 Requirement R3, Standard CIP-005 Requirements R2 and R3, Standard CIP-006 Requirement R2 and R3, Standard CIP-007, Standard CIP-008 and Standard CIP-009. | MEDIUM |
| CIP-006-1 | R1.5 | Process for ensuring that the physical security plan is reviewed at least annually. | MEDIUM |
| CIP-006-1 | R1.6 | Physical Access Controls — The Responsible Entity shall document and implement the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. The Responsible Entity shall implement one or more of the following physical access methods: | MEDIUM |
| CIP-006-1 | R1.7 | Card Key: A means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from one perimeter to another. | LOWER |
| CIP-006-1 | R1.8 | Special Locks: These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. | LOWER |
| CIP-006-1 | R1.9 | Security Personnel: Personnel responsible for controlling physical access who may reside on-site or at a monitoring station. | LOWER |
| CIP-006-1 | R2 | Other Authentication Devices: Biometric, keypad, token, or | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| | | other equivalent devices that control physical access to the Critical Cyber Assets. | |
| CIP-006-1 | R2.1. | Monitoring Physical Access — The Responsible Entity shall document and implement the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. Unauthorized access attempts shall be reviewed immediately and handled in accordance with the procedures specified in Requirement CIP-008. One or more of the following monitoring methods shall be used: | MEDIUM |
| CIP-006-1 | R2.2. | Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel responsible for response. | MEDIUM |
| CIP-006-1 | R2.3. | Human Observation of Access Points: Monitoring of physical access points by authorized personnel as specified in Requirement R2.3. | MEDIUM |
| CIP-006-1 | R2.4. | Logging Physical Access — Logging shall record sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. The Responsible Entity shall implement and document the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: | MEDIUM |
| CIP-006-1 | R3 | Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method. | MEDIUM |
| CIP-006-1 | R3.1. | Video Recording: Electronic capture of video images of sufficient quality to determine identity. | MEDIUM |
| CIP-006-1 | R3.2. | Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R2.3. | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-006-1 | R4 | Access Log Retention — The responsible entity shall retain physical access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008. | LOWER |
| CIP-006-1 | R4.1. | Maintenance and Testing — The Responsible Entity shall implement a maintenance and testing program to ensure that all physical security systems under Requirements R2, R3, and R4 function properly. The program must include, at a minimum, the following: | LOWER |
| CIP-006-1 | R4.2. | Testing and maintenance of all physical security mechanisms on a cycle no longer than three years. | LOWER |
| CIP-006-1 | R4.3. | Retention of testing and maintenance records for the cycle determined by the Responsible Entity in Requirement R6.1. | LOWER |
| CIP-006-1 | R5 | Retention of outage records regarding access controls, logging, and monitoring for a minimum of one calendar year. | LOWER |
| CIP-006-1 | R6 | Test Procedures — The Responsible Entity shall ensure that new Cyber Assets and significant changes to existing Cyber Assets within the Electronic Security Perimeter do not adversely affect existing cyber security controls. For purposes of Standard CIP-007, a significant change shall, at a minimum, include implementation of security patches, cumulative service packs, vendor releases, and version upgrades of operating systems, applications, database platforms, or other third-party software or firmware. | MEDIUM |
| CIP-006-1 | R6.1. | The Responsible Entity shall create, implement, and maintain cyber security test procedures in a manner that minimizes adverse effects on the production system or its operation. | MEDIUM |
| CIP-006-1 | R6.2. | The Responsible Entity shall document that testing is performed in a manner that reflects the production environment. | LOWER |
| CIP-006-1 | R6.3. | The Responsible Entity shall document test results. | LOWER |
| CIP-007-1 | R1. | Ports and Services — The Responsible Entity shall establish and document a process to ensure that only those ports and | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| | | services required for normal and emergency operations are enabled. | |
| CIP-007-1 | R1.1. | The Responsible Entity shall enable only those ports and services required for normal and emergency operations. | LOWER |
| CIP-007-1 | R1.2. | The Responsible Entity shall disable other ports and services, including those used for testing purposes, prior to production use of all Cyber Assets inside the Electronic Security Perimeter(s). | LOWER |
| CIP-007-1 | R1.3. | In the case where unused ports and services cannot be disabled due to technical limitations, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure or an acceptance of risk. | LOWER |
| CIP-007-1 | R2. | Security Patch Management — The Responsible Entity, either separately or as a component of the documented configuration management process specified in CIP-003 Requirement R6, shall establish and document a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | MEDIUM |
| CIP-007-1 | R2.1. | The Responsible Entity shall document the assessment of security patches and security upgrades for applicability within thirty calendar days of availability of the patches or upgrades. | MEDIUM |
| CIP-007-1 | R2.2. | The Responsible Entity shall document the implementation of security patches. In any case where the patch is not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure or an acceptance of risk. | MEDIUM |
| CIP-007-1 | R2.3. | Malicious Software Prevention — The Responsible Entity shall use anti-virus software and other malicious software ("malware") prevention tools, where technically feasible, to detect, prevent, deter, and mitigate the introduction, exposure, and propagation of malware on all Cyber Assets within the Electronic Security Perimeter(s). | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| CIP-007-1 | R3. | The Responsible Entity shall document and implement anti- virus and malware prevention tools. In the case where anti- virus software and malware prevention tools are not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure or an acceptance of risk. | LOWER |
| CIP-007-1 | R3.1. | The Responsible Entity shall document and implement a process for the update of anti-virus and malware prevention "signatures." The process must address testing and installing the signatures. | LOWER |
| CIP-007-1 | R3.2. | Account Management — The Responsible Entity shall establish, implement, and document technical and procedural controls that enforce access authentication of, and accountability for, all user activity, and that minimize the risk of unauthorized system access. | LOWER |
| CIP-007-1 | R4. | The Responsible Entity shall ensure that individual and shared system accounts and authorized access permissions are consistent with the concept of "need to know" with respect to work functions performed. | MEDIUM |
| CIP-007-1 | R4.1. | The Responsible Entity shall ensure that user accounts are implemented as approved by designated personnel. Refer to Standard CIP-003 Requirement R5. | MEDIUM |
| CIP-007-1 | R4.2. | The Responsible Entity shall establish methods, processes, and procedures that generate logs of sufficient detail to create historical audit trails of individual user account access activity for a minimum of ninety days. | MEDIUM |
| CIP-007-1 | R5. | The Responsible Entity shall review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003 Requirement R5 and Standard CIP-004 Requirement R4. | LOWER |
| CIP-007-1 | R5.1. | The Responsible Entity shall implement a policy to minimize and manage the scope and acceptable use of administrator, shared, and other generic account privileges including | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| | | factory default accounts. | |
| CIP-007-1 | R5.1.1. | The policy shall include the removal, disabling, or renaming of such accounts where possible. For such accounts that must remain enabled, passwords shall be changed prior to putting any system into service. | LOWER |
| CIP-007-1 | R5.1.2. | The Responsible Entity shall identify those individuals with access to shared accounts. | LOWER |
| CIP-007-1 | R5.1.3. | Where such accounts must be shared, the Responsible Entity shall have a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps for securing the account in the event of personnel changes (for example, change in assignment or termination). | MEDIUM |
| CIP-007-1 | R5.2. | At a minimum, the Responsible Entity shall require and use passwords, subject to the following, as technically feasible: | LOWER |
| CIP-007-1 | R5.2.1. | Each password shall be a minimum of six characters. | MEDIUM |
| CIP-007-1 | R5.2.2. | Each password shall consist of a combination of alpha, numeric, and "special" characters. | LOWER |
| CIP-007-1 | R5.2.3. | Each password shall be changed at least annually, or more frequently based on risk. | MEDIUM |
| CIP-007-1 | R5.3. | Security Status Monitoring — The Responsible Entity shall ensure that all Cyber Assets within the Electronic Security Perimeter, as technically feasible, implement automated tools or organizational process controls to monitor system events that are related to cyber security. | LOWER |
| CIP-007-1 | R5.3.1. | The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter. | LOWER |
| CIP-007-1 | R5.3.2. | The security monitoring controls shall issue automated or manual alerts for detected Cyber Security Incidents. | LOWER |
| CIP-007-1 | R5.3.3. | The Responsible Entity shall maintain logs of system events | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| | | related to cyber security, where technically feasible, to support incident response as required in Standard CIP-008. | |
| CIP-007-1 | R6. | The Responsible Entity shall retain all logs specified in Requirement R6 for ninety calendar days. | LOWER |
| CIP-007-1 | R6.1. | The Responsible Entity shall review logs of system events related to cyber security and maintain records documenting review of logs. | MEDIUM |
| CIP-007-1 | R6.2. | Disposal or Redeployment — The Responsible Entity shall establish formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005. | MEDIUM |
| CIP-007-1 | R6.3. | Prior to the disposal of such assets, the Responsible Entity shall destroy or erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | MEDIUM |
| CIP-007-1 | R6.4. | Prior to redeployment of such assets, the Responsible Entity shall, at a minimum, erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | LOWER |
| CIP-007-1 | R6.5. | The Responsible Entity shall maintain records that such assets were disposed of or redeployed in accordance with documented procedures. | LOWER |
| CIP-007-1 | R7. | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of all Cyber Assets within the Electronic Security Perimeter at least annually. The vulnerability assessment shall include, at a minimum, the following: | LOWER |
| CIP-007-1 | R7.1. | A document identifying the vulnerability assessment process; | LOWER |
| CIP-007-1 | R7.2. | A review to verify that only ports and services required for operation of the Cyber Assets within the Electronic Security Perimeter are enabled; | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF | |
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| CIP-007-1 | R7.3. | A review of controls for default accounts; and, | LOWER | |
| CIP-007-1 | R8 | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | LOWER | |
| CIP-007-1 | R8.1. | Documentation Review and Maintenance — The Responsible Entity shall review and update the documentation specified in Standard CIP-007 at least annually. Changes resulting from modifications to the systems or controls shall be documented within ninety calendar days of the change. | LOWER | |
| CIP-007-1 | R8.2. | Cyber Security Incident Response Plan — The Responsible Entity shall develop and maintain a Cyber Security Incident response plan. The Cyber Security Incident Response plan shall address, at a minimum, the following: | MEDIUM | |
| CIP-007-1 | R8.3. | Procedures to characterize and classify events as reportable Cyber Security Incidents. | MEDIUM | |
| CIP-007-1 | R8.4. | Response actions, including roles and responsibilities of incident response teams, incident handling procedures, and communication plans. | MEDIUM | |
| CIP-007-1 | R9 | | | |
| CIP-008-1 | R1. | Process for updating the Cyber Security Incident response plan within ninety calendar days of any changes. | LOWER | |
| CIP-008-1 | R1.1. | Process for ensuring that the Cyber Security Incident response plan is reviewed at least annually. | LOWER | |
| CIP-008-1 | R1.2. | Process for ensuring the Cyber Security Incident response plan is tested at least annually. A test of the incident response plan can range from a paper drill, to a full | LOWER | |

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| | | operational exercise, to the response to an actual incident. | |
| CIP-008-1 | R1.3. | Cyber Security Incident Documentation — The Responsible Entity shall keep relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 for three calendar years. | LOWER |
| CIP-008-1 | R1.4. | Recovery Plans — The Responsible Entity shall create and annually review recovery plan(s) for Critical Cyber Assets. The recovery plan(s) shall address at a minimum the following: | LOWER |
| CIP-008-1 | R1.5. | Specify the required actions in response to events or conditions of varying duration and severity that would activate the recovery plan(s). | LOWER |
| CIP-008-1 | R1.6. | Define the roles and responsibilities of responders. | LOWER |
| CIP-008-1 | R2 | Exercises — The recovery plan(s) shall be exercised at least annually. An exercise of the recovery plan(s) can range from a paper drill, to a full operational exercise, to recovery from an actual incident. | LOWER |
| CIP-009-1 | R1 | Change Control — Recovery plan(s) shall be updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. Updates shall be communicated to personnel responsible for the activation and implementation of the recovery plan(s) within ninety calendar days of the change. | MEDIUM |
| CIP-009-1 | R1.1. | Backup and Restore — The recovery plan(s) shall include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. For example, backups may include spare electronic components or equipment, written documentation of configuration settings, tape backup, etc. | MEDIUM |
| CIP-009-1 | R1.2. | Testing Backup Media — Information essential to recovery that is stored on backup media shall be tested at least annually to ensure that the information is available. Testing can be completed off site. | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| CIP-009-1 | R2 | | LOWER |
| CIP-009-1 | R3 | | LOWER |
| CIP-009-1 | R4 | | LOWER |
| CIP-009-1 | R5 | | LOWER |

EXHIBIT B

CIP VIOLATION RISK FACTORS AND VIOLATION SEVERITY LEVELS – VERSION 2 (CLEAN AND REDLINE)

CIP Version 2 Violation Severity Levels and Violation Risk Factors

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|---|--|--|
| CIP-002-2 | R1. | Critical Asset Identification Method — The Responsible Entity shall identify and document a risk-based assessment methodology to use to identify its Critical Assets. | N/A | N/A | N/A | The responsible entity has not documented a risk- based assessment methodology to use to identify its Critical Assets as specified in R1. |
| CIP-002-2 | R1.1 | The Responsible Entity shall maintain documentation describing its risk- based assessment methodology that includes procedures and evaluation criteria. | N/A | The Responsible Entity maintained documentation describing its risk- based assessment methodology which includes evaluation criteria, but does not include procedures. | The Responsible Entity maintained documentation describing its risk- based assessment methodology that includes procedures but does not include evaluation criteria. | The Responsible Entity did not maintain documentation describing its risk- based assessment methodology that includes procedures and evaluation criteria. |
| CIP-002-2 | R1.2 | The risk-based assessment shall consider the following assets: | N/A | N/A | N/A | The Responsible Entity did not consider all of the asset types listed in R1.2.1 through R1.2.7 in its risk- based assessment. |
| CIP-002-2 | R1.2.1. | Control centers and backup control centers performing the functions of the entities listed in the Applicability section of this standard. | N/A | N/A | N/A | N/A |
| CIP-002-2 | R1.2.2. | Transmission substations that support the reliable operation of the Bulk Electric System. | N/A | N/A | N/A | N/A |
| CIP-002-2 | R1.2.3. | Generation resources that support | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|--|---|
| | | the reliable operation of the Bulk Electric System. | | | | |
| CIP-002-2 | R1.2.4. | Systems and facilities critical to system restoration, including blackstart generators and substations in the electrical path of transmission lines used for initial system restoration. | N/A | N/A | N/A | N/A |
| CIP-002-2 | R1.2.5. | Systems and facilities critical to automatic load shedding under a common control system capable of shedding 300 MW or more. | N/A | N/A | N/A | N/A |
| CIP-002-2 | R1.2.6. | Special Protection Systems that support the reliable operation of the Bulk Electric System. | N/A | N/A | N/A | N/A |
| CIP-002-2 | R1.2.7. | Any additional assets that support the reliable operation of the Bulk Electric System that the Responsible Entity deems appropriate to include in its assessment. | N/A | N/A | N/A | N/A |
| CIP-002-2 | R2. | Critical Asset Identification — The Responsible Entity shall develop a list of its identified Critical Assets determined through an annual application of the risk-based assessment methodology required in R1. The Responsible Entity shall review this list at least annually, and update it as necessary. | N/A | N/A | The Responsible Entity has developed a list of Critical Assets but the list has not been reviewed and updated annually as required. | The Responsible Entity did not develop a list of its identified Critical Assets even if such list is null. |
| CIP-002-2 | R3. | Critical Cyber Asset Identification — Using the list of Critical Assets developed pursuant to Requirement R2, the Responsible Entity shall develop a list of associated Critical Cyber Assets essential to the operation of the Critical Asset. Examples at control centers and | N/A | N/A | The Responsible Entity has developed a list of associated Critical Cyber Assets essential to the operation of the Critical Asset list as per requirement R2 | The Responsible Entity did not develop a list of associated Critical Cyber Assets essential to the operation of the Critical Asset list as |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|---|---|
| | | backup control centers include systems and facilities at master and remote sites that provide monitoring and control, automatic generation control, real-time power system modeling, and real-time inter-utility data exchange. The Responsible Entity shall review this list at least annually, and update it as necessary. For the purpose of Standard CIP-002- 2, Critical Cyber Assets are further qualified to be those having at least one of the following characteristics: | | | but the list has not been reviewed and updated annually as required. | per requirement R2 even if such list is null. |
| CIP-002-2 | R3.1 | The Cyber Asset uses a routable protocol to communicate outside the Electronic Security Perimeter; or, | N/A | N/A | N/A | A Cyber Asset essential to the operation of the Critical Asset was identified that met the criteria in this requirement but was not included in the Critical Cyber Asset List. |
| CIP-002-2 | R3.2. | The Cyber Asset uses a routable protocol within a control center; or, | N/A | N/A | N/A | A Cyber Asset essential to the operation of the Critical Asset was identified that met the criteria in this requirement but was not included in the Critical Cyber Asset List. |
| CIP-002-2 | R3.3. | The Cyber Asset is dial-up accessible. | N/A | N/A | N/A | A Cyber Asset essential to the operation of the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|---|---|--|
| | | | | | | Critical Asset was identified that met the criteria in this requirement but was not included in the Critical Cyber Asset List. |
| CIP-002-2 | R4. | Annual Approval — The senior manager or delegate(s) shall approve annually the risk-based assessment methodology, the list of Critical Assets and the list of Critical Cyber Assets. Based on Requirements R1, R2, and R3 the Responsible Entity may determine that it has no Critical Assets or Critical Cyber Assets. The Responsible Entity shall keep a signed and dated record of the senior manager or delegate(s)'s approval of the risk-based assessment methodology, the list of Critical Assets and the list of Critical Cyber Assets (even if such lists are null.) | N/A | The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s)'s annual approval of the risk- based assessment methodology, the list of Critical Assets or the list of Critical Cyber Assets (even if such lists are null.) | The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s)'s annual approval of two of the following: the risk-based assessment methodology, the list of Critical Assets or the list of Critical Cyber Assets (even if such lists are null.) | The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s) annual approval of 1) A risk based assessment methodology for identification of Critical Assets, 2) a signed and dated approval of the list of Critical Assets, nor 3) a signed and dated approval of the list of Critical Cyber Assets (even if such lists are null.) |
| CIP-003-2 | R1. | Cyber Security Policy — The Responsible Entity shall document and implement a cyber security policy that represents management's commitment and ability to secure its Critical Cyber Assets. The Responsible Entity shall, at minimum, ensure the following: | N/A | N/A | N/A | The Responsible Entity has not documented or implemented a cyber security policy. |
| CIP-003-2 | R1.1. | The cyber security policy addresses | N/A | N/A | N/A | The Responsible |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|----------|--|
| | | the requirements in Standards CIP- 002-2 through CIP-009-2, including provision for emergency situations. | | | | Entity's cyber security policy does not address all the requirements in Standards CIP-002 through CIP-009, including provision for emergency situations. |
| CIP-003-2 | R1.2. | The cyber security policy is readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets. | N/A | N/A | N/A | The Responsible Entity's cyber security policy is not readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets. |
| CIP-003-2 | R1.3 | Annual review and approval of the cyber security policy by the senior manager assigned pursuant to R2. | N/A | N/A | N/A | The Responsible Entity's senior manager, assigned pursuant to R2, did not complete the annual review and approval of its cyber security policy. |
| CIP-003-2 | R2. | Leadership — The Responsible Entity shall assign a single senior manager with overall responsibility and authority for leading and managing the entity's implementation of, and adherence to, Standards CIP-002-2 through CIP-009-2. | N/A | N/A | N/A | The Responsible Entity has not assigned a single senior manager with overall responsibility and authority for leading and managing the entity's implementation of, and adherence to, |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|---|--|
| | | | | | | Standards CIP-002 through CIP-009. |
| CIP-003-2 | R2.1. | The senior manager shall be identified by name, title, and date of designation. | N/A | N/A | N/A | Identification of the senior manager is missing one of the following: name, title, or date of designation. |
| CIP-003-2 | R2.2. | Changes to the senior manager must be documented within thirty calendar days of the effective date. | N/A | N/A | N/A | Changes to the senior manager were not documented within 30 days of the effective date. |
| CIP-003-2 | R2.3. | Where allowed by Standards CIP- 002-2 through CIP-009-2, the senior manager may delegate authority for specific actions to a named delegate or delegates. These delegations shall be documented in the same manner as R2.1 and R2.2, and approved by the senior manager. | N/A | N/A | The identification of a senior manager's delegate does not include at least one of the following; name, title, or date of the designation, OR The document is not approved by the senior manager, OR Changes to the | A senior manager's delegate is not identified by name, title, and date of designation; the document delegating the authority does not identify the authority being delegated; the document delegating the authority is not approved by the senior manager; AND |
| | | | | | delegated authority are not documented within thirty | changes to the delegated authority |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | calendar days of the effective date. | are not documented within thirty calendar days of the effective date. |
| CIP-003-2 | R2.4 | The senior manager or delegate(s), shall authorize and document any exception from the requirements of the cyber security policy. | N/A | N/A | N/A | The senior manager or delegate(s) did not authorize and document any exceptions from the requirements of the cyber security policy as required. |
| CIP-003-2 | R3. | Exceptions — Instances where the Responsible Entity cannot conform to its cyber security policy must be documented as exceptions and authorized by the senior manager or delegate(s). | N/A | N/A | In Instances where the Responsible Entity cannot conform to its cyber security policy, in R1, exceptions were documented, but were not authorized by the senior manager or delegate(s). | In Instances where the Responsible Entity cannot conform to its cyber security policy, in R1, exceptions were not documented. |
| CIP-003-2 | R3.1. | Exceptions to the Responsible Entity's cyber security policy must be documented within thirty days of being approved by the senior manager or delegate(s). | N/A | N/A | N/A | Exceptions to the Responsible Entity's cyber security policy were not documented within 30 days of being approved by the senior manager or delegate(s). |
| CIP-003-2 | R3.2. | Documented exceptions to the cyber security policy must include an explanation as to why the exception | N/A | N/A | The Responsible Entity has a documented | The Responsible Entity has a documented |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | is necessary and any compensating measures. | | | exception to the cyber security policy in R1 but did not include either : 1) an explanation as to why the exception is necessary, or 2) any compensating measures. | exception to the cyber security policy in R1 but did not include both: 1) an explanation as to why the exception is necessary, and 2) any compensating measures. |
| CIP-003-2 | R3.3. | Authorized exceptions to the cyber security policy must be reviewed and approved annually by the senior manager or delegate(s) to ensure the exceptions are still required and valid. Such review and approval shall be documented. | N/A | N/A | N/A | Exceptions to the cyber security policy were not reviewed or were not approved on an annual basis by the senior manager or delegate(s) to ensure the exceptions are still required and valid or the review and approval is not documented. |
| CIP-003-2 | R4. | Information Protection — The Responsible Entity shall implement and document a program to identify, classify, and protect information associated with Critical Cyber Assets. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document a program to identify, classify, and protect information associated with Critical Cyber Assets. |
| CIP-003-2 | R4.1. | The Critical Cyber Asset information | N/A | N/A | The information | The information |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|--|--|
| | | to be protected shall include, at a minimum and regardless of media type, operational procedures, lists as required in Standard CIP- 002-2, network topology or similar diagrams, floor plans of computing centers that contain Critical Cyber Assets, equipment layouts of Critical Cyber Assets, disaster recovery plans, incident response plans, and security configuration information. | | | protection program does not include one of the minimum information types to be protected as detailed in R4.1. | protection program does not include two or more of the minimum information types to be protected as detailed in R4.1. |
| CIP-003-2 | R4.2. | The Responsible Entity shall classify information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. | N/A | N/A | N/A | The Responsible Entity did not classify the information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. |
| CIP-003-2 | R4.3. | The Responsible Entity shall, at least annually, assess adherence to its Critical Cyber Asset information protection program, document the assessment results, and implement an action plan to remediate deficiencies identified during the assessment. | N/A | N/A | N/A | The Responsible Entity did not annually assess adherence to its Critical Cyber Asset information protection program, including documentation of the assessment results, OR The Responsible Entity did not implement an action plan to remediate |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|--|--|
| | | | | | | deficiencies identified during the assessment. |
| CIP-003-2 | R5. | Access Control — The Responsible Entity shall document and implement a program for managing access to protected Critical Cyber Asset information. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document a program for managing access to protected Critical Cyber Asset information. |
| CIP-003-2 | R5.1. | The Responsible Entity shall maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information. | N/A | N/A | The Responsible Entity maintained a list of designated personnel for authorizing either logical or physical access but not both. | The Responsible Entity did not maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information. |
| CIP-003-2 | R5.1.1. | Personnel shall be identified by name, title, and the information for which they are responsible for authorizing access. | N/A | N/A | The Responsible Entity did identify the personnel by name, title, and the information for which they are responsible for authorizing access, but the business phone is missing. | Personnel are not identified by name, title, or the information for which they are responsible for authorizing access. |
| CIP-003-2 | R5.1.2. | The list of personnel responsible for authorizing access to protected information shall be verified at least | N/A | N/A | N/A | The Responsible Entity did not verify at least annually the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|----------|---|
| | | annually. | | | | list of personnel responsible for authorizing access to protected information. |
| CIP-003-2 | R5.2. | The Responsible Entity shall review at least annually the access privileges to protected information to confirm that access privileges are correct and that they correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities. | N/A | N/A | N/A | The Responsible Entity did not review at least annually the access privileges to protected information to confirm that access privileges are correct and that they correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities. |
| CIP-003-2 | R5.3. | The Responsible Entity shall assess and document at least annually the processes for controlling access privileges to protected information. | N/A | N/A | N/A | The Responsible Entity did not assess and document at least annually the processes for controlling access privileges to protected information. |
| CIP-003-2 | R6. | Change Control and Configuration Management — The Responsible Entity shall establish and document a process of change control and configuration management for adding, modifying, replacing, or removing Critical Cyber Asset | N/A | N/A | N/A | The Responsible Entity has not established or documented a change control process for the activities required in |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|--|---|
| | | hardware or software, and implement supporting configuration management activities to identify, control and document all entity or vendor related changes to hardware and software components of Critical Cyber Assets pursuant to the change control process. | | | | R6, OR The Responsible Entity has not established or documented a configuration management process for the activities required in R6. |
| CIP-004-2 | R1. | Awareness — The Responsible Entity shall establish, document, implement, and maintain a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security practices. The program shall include security awareness reinforcement on at least a quarterly basis using mechanisms such as: • 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, | N/A | N/A | The Responsible ^{[1}] Entity did not provide security awareness reinforcement on at least a quarterly basis. | The Responsible Entity did not establish, implement, maintain, or document a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security practices. |

¹ Please note that FERC's January 20, 2011 Order on Version 2 And Version 3 Violation Risk Factors And Violation Severity Levels For Critical Infrastructure Protection Reliability Standards dictated "Responsible Entity" to be changed to "Responsibility Entity." NERC assumes FERC intended the VSL to read "Responsible Entity" and therefore is not making this change. NERC proposes to remove this footnote from the final approved list of VSLs.

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|---|---|
| | | etc.). | | | | |
| CIP-004-2 | R2. | Training — The Responsible Entity shall establish, document, implement, and maintain an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. The cyber security training program shall be reviewed annually, at a minimum, and shall be updated whenever necessary. | N/A | N/A | The Responsible[²] Entity did not review the training program on an annual basis. | The Responsible Entity did not establish, implement, maintain, or document an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. |
| CIP-004-2 | R2.1. | This program will ensure that all personnel having such access to Critical Cyber Assets, including contractors and service vendors, are trained prior to their being granted such access except in specified circumstances such as an emergency. | N/A | N/A | N/A | Not all personnel having authorized cyber or unescorted physical access to Critical Cyber Assets, including contractors and service vendors, were trained prior to their being granted such access except in specified circumstances such as an emergency. |
| CIP-004-2 | R2.2. | Training shall cover the policies, access controls, and procedures as developed for the Critical Cyber Assets covered by CIP-004-2, and include, at a minimum, the following | N/A | N/A | N/A | The training does not include one or more of the minimum topics as detailed in R2.2.1, |

² Please see previous footnote. NERC proposes to remove this footnote from the final approved list of VSLs.

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|---|--|---|
| | | required items appropriate to personnel roles and responsibilities: | | | | R2.2.2, R2.2.3, R2.2.4. |
| CIP-004-2 | R2.2.1. | The proper use of Critical Cyber Assets; | N/A | N/A | N/A | N/A |
| CIP-004-2 | R2.2.2. | Physical and electronic access controls to Critical Cyber Assets; | N/A | N/A | N/A | N/A |
| CIP-004-2 | R2.2.3. | The proper handling of Critical Cyber Asset information; and, | N/A | N/A | N/A | N/A |
| CIP-004-2 | R2.2.4. | Action plans and procedures to recover or re-establish Critical Cyber Assets and access thereto following a Cyber Security Incident. | N/A | N/A | N/A | N/A |
| CIP-004-2 | R2.3. | The Responsible Entity shall maintain documentation that training is conducted at least annually, including the date the training was completed and attendance records. | N/A | N/A | The Responsible Entity did maintain documentation that training is conducted at least annually, but did not include attendance records. | The Responsible Entity did not maintain documentation that training is conducted at least annually, including the date the training was completed and attendance records. |
| CIP-004-2 | R3. | Personnel Risk Assessment —The Responsible Entity shall have a documented personnel risk assessment program, in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements, for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. A personnel risk assessment shall be conducted pursuant to that program prior to | N/A | The Responsible Entity has a personnel risk assessment program, , as stated in R3 for personnel having authorized cyber or authorized unescorted physical access, but the program is not documented. | The Responsible Entity has a personnel risk assessment program as stated in R3, but conducted the personnel risk assessment pursuant to that program after such personnel were granted such access except in specified | The Responsible Entity does not have a documented personnel risk assessment program, as stated in R3, for personnel having authorized cyber or authorized unescorted physical access. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--|--|---|
| | | such personnel being granted such access except in specified circumstances such as an emergency. The personnel risk assessment program shall at a minimum include: | | | circumstances such as an emergency. | OR The Responsible Entity did not conduct the personnel risk assessment pursuant to that program for personnel granted such access except in specified circumstances such as an emergency. |
| CIP-004-2 | R3.1. | The Responsible Entity shall ensure that each assessment conducted include, at least, identity verification (e.g., Social Security Number verification in the U.S.) and seven year criminal check. The Responsible Entity may conduct more detailed reviews, as permitted by law and subject to existing collective bargaining unit agreements, depending upon the criticality of the position. | N/A | N/A | The Responsible Entity did not ensure that an assessment conducted included an identity verification (e.g., Social Security Number verification in the U.S.) or a seven-year criminal check. | The Responsible Entity did not ensure that each assessment conducted include, at least, identity verification (e.g., Social Security Number verification in the U.S.) and seven-year criminal check. |
| CIP-004-2 | R3.2. | The Responsible Entity shall update each personnel risk assessment at least every seven years after the initial personnel risk assessment or for cause. | N/A | The Responsible Entity did not update each personnel risk assessment at least every seven years after the initial personnel risk assessment but did update it for cause | The Responsible Entity did not update each personnel risk assessment for cause (when applicable) but did at least updated it every seven years after the initial | The Responsible Entity did not update each personnel risk assessment at least every seven years after the initial personnel risk assessment nor was it updated for cause |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|---|--|---|--|
| | | | | when applicable. | personnel risk assessment. | when applicable. |
| CIP-004-2 | R3.3. | The Responsible Entity shall document the results of personnel risk assessments of its personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets, and that personnel risk assessments of contractor and service vendor personnel with such access are conducted pursuant to Standard CIP- 004-2. | The Responsible Entity did not document the results of personnel risk assessments for at least one individual but less than 5% of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | The Responsible Entity did not document the results of personnel risk assessments for 5% or more but less than 10% of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | The Responsible Entity did not document the results of personnel risk assessments for 10% or more but less than 15% of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | The Responsible Entity did not document the results of personnel risk assessments for 15% or more of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. |
| CIP-004-2 | R4. | Access — The Responsible Entity shall maintain list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets. | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets, missing at least one individual but less than 5% of the authorized | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets, missing 5% or more but less than 10% of the authorized personnel. | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets, missing 10% or more but less than 15% of the authorized personnel. | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets, missing 15% or more of the authorized personnel. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-004-2 | R4.1. | The Responsible Entity shall review the list(s) of its personnel who have such access to Critical Cyber Assets quarterly, and update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, or any change in the access rights of such personnel. The Responsible Entity shall ensure access list(s) for contractors and service vendors are properly maintained. | personnel. N/A | The Responsible Entity did not review the list(s) of its personnel who have access to Critical Cyber Assets quarterly. | The Responsible Entity did not update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, nor any change in the access rights of such personnel. | The Responsible Entity did not review the list(s) of all personnel who have access to Critical Cyber Assets quarterly, nor update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, nor any change in the access rights of such personnel. |
| CIP-004-2 | R4.2. | The Responsible Entity shall revoke such access to Critical Cyber Assets within 24 hours for personnel terminated for cause and within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. | N/A | The Responsible Entity did not revoke access within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. | The Responsible Entity did not revoke access to Critical Cyber Assets within 24 hours for personnel terminated for cause. | The Responsible Entity did not revoke access to Critical Cyber Assets within 24 hours for personnel terminated for cause nor within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. |
| CIP-005-2 | R1. | Electronic Security Perimeter — The Responsible Entity shall ensure that every Critical Cyber Asset resides within an Electronic Security Perimeter. The Responsible Entity shall identify and document the | N/A | N/A | N/A | The Responsible Entity did not ensure that every Critical Cyber Asset resides within an Electronic |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | Electronic Security Perimeter(s) and all access points to the perimeter(s). | | | | Security Perimeter. OR The Responsible Entity did not identify and document the Electronic Security Perimeter(s) and all access points to the perimeter(s). |
| CIP-005-2 | R1.1. | Access points to the Electronic Security Perimeter(s) shall include any externally connected communication end point (for example, dial-up modems) terminating at any device within the Electronic Security Perimeter(s). | N/A | N/A | N/A | Access points to the Electronic Security Perimeter(s) do not include all externally connected communication end point (for example, dial-up modems) terminating at any device within the Electronic Security Perimeter(s). |
| CIP-005-2 | R1.2. | For a dial-up accessible Critical Cyber Asset that uses a non-routable protocol, the Responsible Entity shall define an Electronic Security Perimeter for that single access point at the dial-up device. | N/A | N/A | N/A | For one or more dial-up accessible Critical Cyber Assets that use a non- routable protocol, the Responsible Entity did not define an Electronic Security Perimeter for that single access point at the dial-up device. |
| CIP-005-2 | R1.3. | Communication links connecting | N/A | N/A | N/A | At least one end |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | discrete Electronic Security Perimeters shall not be considered part of the Electronic Security Perimeter. However, end points of these communication links within the Electronic Security Perimeter(s) shall be considered access points to the Electronic Security Perimeter(s). | | | | point of a communication link within the Electronic Security Perimeter(s) connecting discrete Electronic Security Perimeters was not considered an access point to the Electronic Security Perimeter. |
| CIP-005-2 | R1.4. | Any non-critical Cyber Asset within a defined Electronic Security Perimeter shall be identified and protected pursuant to the requirements of Standard CIP-005-2. | N/A | N/A | N/A | One or more noncritical Cyber Asset within a defined Electronic Security Perimeter is not identified. OR Is not protected pursuant to the requirements of Standard CIP-005. |
| CIP-005-2 | R1.5. | Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall be afforded the protective measures as a specified in Standard CIP-003-2; Standard CIP-004-2 Requirement R3; Standard CIP-005-2 Requirements R2 and R3; Standard CIP-006-2 Requirement R3; Standard CIP-007-2 Requirements R1 and R3 through R9; Standard CIP-008-2; and Standard CIP-009-2. | N/A | N/A | N/A | A Cyber Asset used in the access control and/or monitoring of the Electronic Security Perimeter(s) was not afforded one (1) or more of the protective measures as specified in Standard CIP-003-2; Standard CIP-004-2 Requirement R3; |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | Standard CIP-005-2 Requirements R2 and R3; Standard CIP-006-2 Requirement s -R3; Standard CIP-007-2 Requirements R1 and R3 through R9; Standard CIP-008-2; and Standard CIP- 009-2. |
| CIP-005-2 | R1.6. | The Responsible Entity shall maintain documentation of Electronic Security Perimeter(s), all interconnected Critical and non-critical Cyber Assets within the Electronic Security Perimeter(s), all electronic access points to the Electronic Security Perimeter(s) and the Cyber Assets deployed for the access control and monitoring of these access points. | N/A | N/A | N/A | The Responsible Entity did not maintain documentation of one or more of the following: Electronic Security Perimeter(s), interconnected Critical and noncritical Cyber Assets within the Electronic Security Perimeter(s), electronic access points to the Electronic Security Perimeter(s) and Cyber Assets deployed for the access control and monitoring of these access points. |
| CIP-005-2 | R2. | Electronic Access Controls — The Responsible Entity shall implement and document the organizational | N/A | N/A | N/A | The Responsible Entity did not |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | processes and technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s). | | | | implement or did not document the organizational processes and technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s). |
| CIP-005-2 | R2.1. | These processes and mechanisms shall use an access control model that denies access by default, such that explicit access permissions must be specified. | N/A | N/A | N/A | The processes and mechanisms did not use an access control model that denies access by default, such that explicit access permissions must be specified. |
| CIP-005-2 | R2.2. | At all access points to the Electronic Security Perimeter(s), the Responsible Entity shall enable only ports and services required for operations and for monitoring Cyber Assets within the Electronic Security Perimeter, and shall document, individually or by specified grouping, the configuration of those ports and services. | N/A | N/A | N/A | At one or more access points to the Electronic Security Perimeter(s), the Responsible Entity enabled ports and services not required for operations and for monitoring Cyber Assets within the Electronic Security Perimeter, or did not document, |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | individually or by specified grouping, the configuration of those ports and services. |
| CIP-005-2 | R2.3. | The Responsible Entity shall implement and maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not implement or maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s) where applicable. |
| CIP-005-2 | R2.4. | Where external interactive access into the Electronic Security Perimeter has been enabled, the Responsible Entity shall implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible. | N/A | N/A | N/A | Where external interactive access into the Electronic Security Perimeter has been enabled the Responsible Entity did not implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible. |
| CIP-005-2 | R2.5. | The required documentation shall, at least, identify and describe: | N/A | N/A | N/A | The required documentation for R2 did not include one or more of the elements described in R2.5.1 through |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | R2.5.4. |
| CIP-005-2 | R2.5.1. | The processes for access request and authorization. | N/A | N/A | N/A | N/A |
| CIP-005-2 | R2.5.2. | The authentication methods. | N/A | N/A | N/A | N/A |
| CIP-005-2 | R2.5.3. | The review process for authorization rights, in accordance with Standard CIP-004-2 Requirement R4. | N/A | N/A | N/A | N/A |
| CIP-005-2 | R2.5.4. | The controls used to secure dial-up accessible connections. | N/A | N/A | N/A | N/A |
| CIP-005-2 | R2.6. | Appropriate Use Banner — Where technically feasible, electronic access control devices shall display an appropriate use banner on the user screen upon all interactive access attempts. The Responsible Entity shall maintain a document identifying the content of the banner. | The Responsible Entity did not maintain a document identifying the content of the banner. OR Where technically feasible less than 5% electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. | Where technically feasible 5% but less than 10% of electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. | Where technically feasible 10% but less than 15% of electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. | Where technically feasible, 15% or more electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. |
| CIP-005-2 | R3. | Monitoring Electronic Access — The Responsible Entity shall implement and document an electronic or manual process(es) for monitoring and logging access at access points to the Electronic Security Perimeter(s) twenty-four hours a | N/A | N/A | N/A | The Responsible Entity did not implement or did not document electronic or manual processes monitoring and |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | day, seven days a week. | | | | logging access points. |
| CIP-005-2 | R3.1. | For dial-up accessible Critical Cyber Assets that use non-routable protocols, the Responsible Entity shall implement and document monitoring process(es) at each access point to the dial-up device, where technically feasible. | N/A | N/A | N/A | Where technically feasible, the Responsible Entity did not implement or did not document electronic or manual processes for monitoring at one or more access points to dial-up devices. |
| CIP-005-2 | R3.2. | Where technically feasible, the security monitoring process(es) shall detect and alert for attempts at or actual unauthorized accesses. These alerts shall provide for appropriate notification to designated response personnel. Where alerting is not technically feasible, the Responsible Entity shall review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. | N/A | N/A | N/A | Where technically feasible, the Responsible Entity did not implement security monitoring process(es) to detect and alert for attempts at or actual unauthorized accesses. OR The above alerts do not provide for appropriate notification to designated response personnel. OR Where alerting is not technically feasible, the Responsible Entity did not review or |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. |
| CIP-005-2 | R4. | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of the electronic access points to the Electronic Security Perimeter(s) at least annually. The vulnerability assessment shall include, at a minimum, the following: | N/A | N/A | N/A | The Responsible Entity did not perform a Vulnerability Assessment at least annually for one or more of the access points to the Electronic Security Perimeter(s). OR The vulnerability assessment did not include one (1) or more of the subrequirements R4.1, R4.2, R4.3, R4.4, R4.5. |
| CIP-005-2 | R4.1. | A document identifying the vulnerability assessment process; | N/A | N/A | N/A | N/A |
| CIP-005-2 | R4.2. | A review to verify that only ports and services required for operations at these access points are enabled; | N/A | N/A | N/A | N/A |
| CIP-005-2 | R4.3. | The discovery of all access points to the Electronic Security Perimeter; | N/A | N/A | N/A | N/A |
| CIP-005-2 | R4.4. | A review of controls for default accounts, passwords, and network management community strings; | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-005-2 | R4.5. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | N/A | N/A | N/A | N/A |
| CIP-005-2 | R5. | Documentation Review and Maintenance — The Responsible Entity shall review, update, and maintain all documentation to support compliance with the requirements of Standard CIP-005-2. | The Responsible Entity did not review, update, and maintain at least one but less than or equal to 5% of the documentation to support compliance with the requirements of Standard CIP-005. | The Responsible Entity did not review, update, and maintain greater than 5% but less than or equal to 10% of the documentation to support compliance with the requirements of Standard CIP-005. | The Responsible Entity did not review, update, and maintain greater than 10% but less than or equal to 15% of the documentation to support compliance with the requirements of Standard CIP-005. | The Responsible Entity did not review, update, and maintain greater than 15% of the documentation to support compliance with the requirements of Standard CIP-005. |
| CIP-005-2 | R5.1. | The Responsible Entity shall ensure that all documentation required by Standard CIP- 005-2 reflect current configurations and processes and shall review the documents and procedures referenced in Standard CIP-005-2 at least annually. | N/A | The Responsible Entity did not provide evidence of an annual review of the documents and procedures referenced in Standard CIP-005. | The Responsible Entity did not document current configurations and processes referenced in Standard CIP-005. | The Responsible Entity did not document current configurations and processes and did not review the documents and procedures referenced in Standard CIP-005 at least annually. |
| CIP-005-2 | R5.2. | The Responsible Entity shall update the documentation to reflect the modification of the network or controls within ninety calendar days of the change. | N/A | N/A | N/A | The Responsible Entity did not update documentation to reflect a modification of the network or controls within ninety |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | calendar days of the change. |
| CIP-005-2 | R5.3. | The Responsible Entity shall retain electronic access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-2. | The Responsible Entity retained electronic access logs for 75 or more calendar days, but for less than 90 calendar days. | The Responsible Entity retained electronic access logs for 60 or more calendar days, but for less than 75 calendar days. | The Responsible Entity retained electronic access logs for 45 or more calendar days , but for less than 60 calendar days. | The Responsible Entity retained electronic access logs for less than 45 calendar days. |
| CIP-006-2 | R1. | Physical Security Plan — The Responsible Entity shall document, implement, and maintain a physical security plan, approved by the senior manager or delegate(s) that shall address, at a minimum, the following: | N/A | N/A | The Responsible Entity created a physical security plan but did not gain approval by a senior manager or delegate(s). OR The Responsible Entity created and implemented but did not maintain a physical security plan. | The Responsible Entity did not document, implement, and maintain a physical security plan. |
| CIP-006-2 | R1.1. | All Cyber Assets within an Electronic Security Perimeter shall reside within an identified Physical Security Perimeter. Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity shall deploy and document alternative measures to control physical access to such Cyber Assets. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not include processes to ensure and document that all Cyber Assets within an Electronic Security Perimeter also reside within an |

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| | | | | | | identified Physical Security Perimeter. |
| | | | | | | OR |
| | | | | | | Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity has not deployed or documented alternative measures to control physical access to such Cyber Assets within the Electronic Security Perimeter. |
| CIP-006-2 | R1.2. | Identification of all physical access points through each Physical Security Perimeter and measures to control entry at those access points. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not identify all access points through each Physical Security Perimeter or does not identify measures to control entry at those access points. |
| CIP-006-2 | R1.3 | Processes, tools, and procedures to monitor physical access to the perimeter(s). | N/A | N/A | N/A | The Responsible Entity's physical security plan does not include processes, tools, and procedures to |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | monitor physical access to the perimeter(s). |
| CIP-006-2 | R1.4 | Appropriate use of physical access controls as described in Requirement R4 including visitor pass management, response to loss, and prohibition of inappropriate use of physical access controls. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not address the appropriate use of physical access controls as described in Requirement R4. |
| CIP-006-2 | R1.5 | Review of access authorization requests and revocation of access authorization, in accordance with CIP-004-2 Requirement R4. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not address the review of access authorization requests or the revocation of access authorization, in accordance with CIP-004-2 Requirement R4. |
| CIP-006-2 | R1.6 | Continuous escorted access within the Physical Security Perimeter of personnel not authorized for unescorted access. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not address the process for continuous escorted access within the physical security perimeter. |
| CIP-006-2 | R1.7 | Update of the physical security plan within thirty calendar days of the | N/A | N/A | N/A | The Responsible Entity's physical |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | completion of any physical security system redesign or reconfiguration, including, but not limited to, addition or removal of access points through the Physical Security Perimeter, physical access controls, monitoring controls, or logging controls. | | | | security plan does not address updating the physical security plan within-thirty calendar days of the completion of a physical security system redesign or within thirty calendar days of the completion of a reconfiguration. OR The plan was not updated within thirty calendar days of the completion of a physical security system redesign or reconfiguration. |
| CIP-006-2 | R1.8 | Annual review of the physical security plan. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not address a process for ensuring that the physical security plan is reviewed at least annually. |
| CIP-006-2 | R2 | Protection of Physical Access Control | N/A | N/A | N/A | A Cyber Asset that |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | Systems — Cyber Assets that authorize and/or log access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers, shall: | | | | authorizes and/or logs access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers, was not protected |
| | | | | | | from unauthorized physical access. OR |
| | | | | | | A Cyber Asset that authorizes and/or logs access to the Physical Security Perimeter(s), exclusive of |
| | | | | | | hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms |
| | | | | | | and badge readers was not afforded the protective measures specified in Standard CIP-003- 2; Standard CIP-004- 2 Requirement R3; |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | Standard CIP-005-2 Requirements R2 and R3; Standard CIP-006-2 Requirements R4 and R5; Standard CIP-007-2; Standard CIP-008-2; and Standard CIP-009-2. |
| CIP-006-2 | R2.1. | Be protected from unauthorized physical access. | N/A | N/A | N/A | N/A |
| CIP-006-2 | R2.2. | Be afforded the protective measures specified in Standard CIP-003-2; Standard CIP-004-2 Requirement R3; Standard CIP-005-2 Requirements R2 and R3; Standard CIP-006-2 Requirements R4 and R5; Standard CIP-007-2; Standard CIP-008-2; and Standard CIP-009-2. | N/A | N/A | N/A | N/A |
| CIP-006-2 | R3 | Protection of Electronic Access Control Systems — Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall reside within an identified Physical Security Perimeter. | N/A | N/A | N/A | A Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) does not reside within an identified Physical Security Perimeter. |
| CIP-006-2 | R4 | Physical Access Controls — The Responsible Entity shall document and implement the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days | N/A | N/A | N/A | The Responsible Entity has not documented or has not implemented the operational and procedural controls to manage physical |

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| | a week. The Responsible Entity shall implement one or more of the following physical access methods: Card Key: A means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from one perimeter to another. Special Locks: These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. Security Personnel: Personnel responsible for controlling physical access who may reside on-site or at a monitoring station. Other Authentication Devices: Biometric, keypad, token, or other equivalent devices that control physical access to the Critical Cyber Assets | | | | access at all access points to the Physical Security Perimeter(s) twenty- four hours a day, seven days a week using one or more of the following physical access methods: • Card Key: A means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from one perimeter to another. • Special Locks: These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. • Security Personnel: Personnel responsible for controlling physical access who may |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | reside on-site or at a monitoring station. • Other Authentication Devices: Biometric, keypad, token, or other equivalent devices that control physical access to the Critical Cyber Assets. |
| CIP-006-2 | R5 | Monitoring Physical Access — The Responsible Entity shall document and implement the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. Unauthorized access attempts shall be reviewed immediately and handled in accordance with the procedures specified in Requirement CIP-008-2. One or more of the following monitoring methods shall be used: • Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel responsible for response. • Human Observation of Access Points: Monitoring of physical access points by | N/A | N/A | N/A | The Responsible Entity has not documented or has not implemented the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) twenty- four hours a day, seven days a week using one or more of the following monitoring methods: • Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | authorized personnel as specified in Requirement R4. | | | | immediate notification to personnel responsible for response. • Human Observation of Access Points: Monitoring of physical access points by authorized personnel as specified in Requirement R4. OR An unauthorized access attempt was not reviewed immediately and handled in accordance with CIP-008-2. |
| CIP-006-2 | R6 | Logging Physical Access — Logging shall record sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. The Responsible Entity shall implement and document the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: | N/AT | N/A | N/A | The Responsible Entity has not implemented or has not documented the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the |

| Standard Requirement Number Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method. Video Recording: Electronic capture of video images of sufficient quality to determine identity. Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4 | | | | following logging methods or their equivalent: • Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method, • Video Recording: Electronic capture of video images of sufficient quality to determine identity, or • Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4. OR The Responsible Entity has not recorded sufficient information to uniquely identify |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | individuals and the time of access twenty-four hours a day, seven days a week. |
| CIP-006-2 | R7 | Access Log Retention — The responsible entity shall retain physical access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-2. | N/A | N/A | N/A | The responsible entity did not retain physical access logs for at least ninety calendar days. |
| CIP-006-2 | R8 | Maintenance and Testing — The Responsible Entity shall implement a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly. The program must include, at a minimum, the following: | N/A | N/A | N/A | The Responsible Entity has not implemented a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly. OR The implemented program does not include one or more of the requirements; |
| CIP-006-2 | R8.1 | Testing and maintenance of all physical security mechanisms on a cycle no longer than three years. | N/A | N/A | N/A | R8.1, R8.2, and R8.3. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-006-2 | R8.2 | Retention of testing and maintenance records for the cycle determined by the Responsible Entity in Requirement R8.1. | N/A | N/A | N/A | N/A |
| CIP-006-2 | R8.3 | Retention of outage records regarding access controls, logging, and monitoring for a minimum of one calendar year. | N/A | N/A | N/A | N/A |
| CIP-007-2 | R1. | Test Procedures — The Responsible Entity shall ensure that new Cyber Assets and significant changes to existing Cyber Assets within the Electronic Security Perimeter do not adversely affect existing cyber security controls. For purposes of Standard CIP-007-2, a significant change shall, at a minimum, include implementation of security patches, cumulative service packs, vendor releases, and version upgrades of operating systems, applications, database platforms, or other third- party software or firmware. | N/A | N/A | N/A | The Responsible Entity did not ensure the prevention of adverse affects described in R1, by not including the required minimum significant changes. OR The Responsible Entity did not address one or more of the following: R1.1, R1.2, R1.3. |
| CIP-007-2 | R1.1. | The Responsible Entity shall create, implement, and maintain cyber security test procedures in a manner that minimizes adverse effects on the production system or its operation. | N/A | N/A | N/A | N/A |
| CIP-007-2 | R1.2. | The Responsible Entity shall document that testing is performed in a manner that reflects the production environment. | N/A | N/A | N/A | N/A |
| CIP-007-2 | R1.3. | The Responsible Entity shall | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | document test results. | | | | |
| CIP-007-2 | R2. | Ports and Services — The Responsible Entity shall establish, document and implement a process to ensure that only those ports and services required for normal and emergency operations are enabled. | N/A | N/A | N/A | The Responsible Entity did not establish (implement) or did not document a process to ensure that only those ports and services required for normal and emergency operations are enabled. |
| CIP-007-2 | R2.1. | The Responsible Entity shall enable only those ports and services required for normal and emergency operations. | N/A | N/A | N/A | The Responsible Entity enabled one or more ports or services not required for normal and emergency operations on Cyber Assets inside the Electronic Security Perimeter(s). |
| CIP-007-2 | R2.2. | The Responsible Entity shall disable other ports and services, including those used for testing purposes, prior to production use of all Cyber Assets inside the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not disable one or more other ports or services, including those used for testing purposes, prior to production use for Cyber Assets inside the Electronic Security Perimeter(s). |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-007-2 | R2.3. | In the case where unused ports and services cannot be disabled due to technical limitations, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | N/A | N/A | N/A | For cases where unused ports and services cannot be disabled due to technical limitations, the Responsible Entity did not document compensating measure(s) applied to mitigate risk. |
| CIP-007-2 | R3. | Security Patch Management — The Responsible Entity, either separately or as a component of the documented configuration management process specified in CIP-003-2 Requirement R6, shall establish, document and implement a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not establish (implement) or did not document, either separately or as a component of the documented configuration management process specified in CIP-003-2 Requirement R6, a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-007-2 | R3.1. | The Responsible Entity shall document the assessment of security patches and security upgrades for applicability within thirty calendar days of availability of the patches or upgrades. | N/A | N/A | N/A | The Responsible Entity did not document the assessment of security patches and security upgrades for applicability as required in Requirement R3 within 30 calendar days after the availability of the patches and upgrades. |
| CIP-007-2 | R3.2. | The Responsible Entity shall document the implementation of security patches. In any case where the patch is not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | N/A | N/A | N/A | The Responsible Entity did not document the implementation of applicable security patches as required in R3. OR Where an applicable patch was not installed, the Responsible Entity did not document the compensating measure(s) applied to mitigate risk. |
| CIP-007-2 | R4. | Malicious Software Prevention — The Responsible Entity shall use anti- virus software and other malicious software ("malware") prevention tools, where technically feasible, to detect, prevent, deter, and mitigate | N/A | N/A | N/A | The Responsible Entity, where technically feasible, did not use anti- virus software or |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | the introduction, exposure, and propagation of malware on all Cyber Assets within the Electronic Security Perimeter(s). | | | | other malicious software ("malware") prevention tools, on <u>one</u> or more Cyber Assets within the Electronic Security Perimeter(s). |
| CIP-007-2 | R4.1. | The Responsible Entity shall document and implement anti-virus and malware prevention tools. In the case where anti-virus software and malware prevention tools are not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | N/A | N/A | N/A | The Responsible Entity did not document the implementation of antivirus and malware prevention tools for cyber assets within the electronic security perimeter. OR The Responsible Entity did not document the implementation of compensating measure(s) applied to mitigate risk exposure where antivirus and malware prevention tools are not installed. |
| CIP-007-2 | R4.2. | The Responsible Entity shall document and implement a process for the update of | N/A | N/A | N/A | The Responsible Entity did not document or did |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | anti-virus and malware prevention "signatures." The process must address testing and installing the signatures. | | | | not implement a process including addressing testing and installing the signatures for the update of anti-virus and malware prevention "signatures." |
| CIP-007-2 | R5. | Account Management — The Responsible Entity shall establish, implement, and document technical and procedural controls that enforce access authentication of, and accountability for, all user activity, and that minimize the risk of unauthorized system access. | N/A | N/A | N/A | The Responsible Entity did not document or did not implement technical and procedural controls that enforce access authentication of, and accountability for, all user activity. |
| CIP-007-2 | R5.1. | The Responsible Entity shall ensure that individual and shared system accounts and authorized access permissions are consistent with the concept of "need to know" with respect to work functions performed. | N/A | N/A | N/A | The Responsible Entity did not ensure that individual and shared system accounts and authorized access permissions are consistent with the concept of "need to know" with respect to work functions performed. |
| CIP-007-2 | R5.1.1. | The Responsible Entity shall ensure that user accounts are implemented as approved by designated personnel. Refer to Standard CIP-003-2 | N/A | N/A | N/A | One or more user accounts implemented by the Responsible Entity were not |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | Requirement R5. | | | | implemented as approved by designated personnel. |
| CIP-007-2 | R5.1.2. | The Responsible Entity shall establish methods, processes, and procedures that generate logs of sufficient detail to create historical audit trails of individual user account access activity for a minimum of ninety days. | N/A | The Responsible Entity generated logs with sufficient detail to create historical audit trails of individual user account access activity, however the logs do not contain activity for a minimum of 90 days. | The Responsible Entity generated logs with insufficient detail to create historical audit trails of individual user account access activity. | The Responsible Entity did not generate logs of individual user account access activity. |
| CIP-007-2 | R5.1.3. | The Responsible Entity shall review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003-2 Requirement R5 and Standard CIP- 004-2 Requirement R4. | N/A | N/A | N/A | The Responsible Entity did not review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003-2 Requirement R5 and Standard CIP-004-2 Requirement R4. |
| CIP-007-2 | R5.2. | The Responsible Entity shall implement a policy to minimize and manage the scope and acceptable use of administrator, shared, and other generic account privileges including factory default accounts. | N/A | N/A | N/A | The Responsible Entity did not implement a policy to minimize and manage the scope and acceptable use of administrator, shared, and other generic account |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | privileges including factory default accounts. |
| CIP-007-2 | R5.2.1. | The policy shall include the removal, disabling, or renaming of such accounts where possible. For such accounts that must remain enabled, passwords shall be changed prior to putting any system into service. | N/A | N/A | The Responsible Entity's policy did not include the removal, disabling, or renaming of such accounts where possible, however for accounts that must remain enabled, passwords were changed prior to putting any system into service. | For accounts that must remain enabled, the Responsible Entity did not change passwords prior to putting any system into service. |
| CIP-007-2 | R5.2.2. | The Responsible Entity shall identify those individuals with access to shared accounts. | N/A | N/A | N/A | The Responsible Entity did not identify all individuals with access to shared accounts. |
| CIP-007-2 | R5.2.3. | Where such accounts must be shared, the Responsible Entity shall have a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps for securing the account in the event of personnel changes (for example, change in assignment or termination). | N/A | N/A | N/A | Where such accounts must be shared, the Responsible Entity has not implemented (one or more components of) a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | account use (automated or manual), and steps for securing the account in the event of personnel changes (for example, change in assignment or termination). |
| CIP-007-2 | R5.3. | At a minimum, the Responsible Entity shall require and use passwords, subject to the following, as technically feasible: | N/A | N/A | N/A | The Responsible Entity does not require passwords subject to R5.3.1, R5.3.2, R5.3.3. OR Does not use passwords subject to R5.3.1, R5.3.2, R5.3.3. |
| CIP-007-2 | R5.3.1. | Each password shall be a minimum of six characters. | N/A | N/A | N/A | N/A |
| CIP-007-2 | R5.3.2. | Each password shall consist of a combination of alpha, numeric, and "special" characters. | N/A | N/A | N/A | N/A |
| CIP-007-2 | R5.3.3. | Each password shall be changed at least annually, or more frequently based on risk. | N/A | N/A | N/A | N/A |
| CIP-007-2 | R6. | Security Status Monitoring — The Responsible Entity shall ensure that all Cyber Assets within the Electronic Security Perimeter, as technically feasible, implement automated tools or organizational process controls to monitor system events that are | N/A | N/A | N/A | The Responsible Entity as technically feasible, did not implement automated tools or organizational process controls, to |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | related to cyber security. | | | | monitor system events that are related to cyber security on one or more of Cyber Assets inside the Electronic Security Perimeter(s). |
| CIP-007-2 | R6.1. | The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter. |
| CIP-007-2 | R6.2. | The security monitoring controls shall issue automated or manual alerts for detected Cyber Security Incidents. | N/A | N/A | N/A | The Responsible entity's security monitoring controls do not issue automated or manual alerts for detected Cyber Security Incidents. |
| CIP-007-2 | R6.3. | The Responsible Entity shall maintain logs of system events related to cyber security, where technically feasible, to support incident response as required in Standard CIP-008-2. | N/A | N/A | N/A | The Responsible Entity did not maintain logs of system events related to cyber security, where |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | technically feasible, to support incident response as required in Standard CIP-008. |
| CIP-007-2 | R6.4. | The Responsible Entity shall retain all logs specified in Requirement R6 for ninety calendar days. | N/A | N/A | N/A | The Responsible Entity did not retain one or more of the logs specified in Requirement R6 for at least 90 calendar days. |
| CIP-007-2 | R6.5. | The Responsible Entity shall review logs of system events related to cyber security and maintain records documenting review of logs. | N/A | N/A | N/A | The Responsible Entity did not review logs of system events related to cyber security nor maintain records documenting review of logs. |
| CIP-007-2 | R7. | Disposal or Redeployment — The Responsible Entity shall establish and implement formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-2. | N/A | N/A | The Responsible Entity established and implemented formal methods, processes, and procedures for redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-2 but did not address redeployment as | The Responsible Entity did not establish or implement formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-2. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | specified in R7.2. | OR The Responsible |
| | | | | | | Entity established formal methods, processes, and procedures for redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-2 but did not address disposal as specified in R7.1. |
| | | | | | | The Responsible Entity did not maintain records pertaining to disposal or redeployment as specified in R7.3.[³] |
| CIP-007-2 | R7.1. | Prior to the disposal of such assets, the Responsible Entity shall destroy or erase the data storage media to | N/A | N/A | N/A | N/A |

³ Please note that FERC's January 20, 2011 Order on Version 2 And Version 3 Violation Risk Factors And Violation Severity Levels For Critical Infrastructure Protection Reliability Standards dictated that this should read "…records pertaining to disposal **of** redeployment as specified in R7.3." (Emphasis added) It has come to NERC's attention that it should read "…records pertaining to disposal **or** redeployment as specified in R7.3." (Emphasis added) and NERC has made this change accordingly. NERC proposes to remove this footnote from the final approved list of VSLs.

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | prevent unauthorized retrieval of sensitive cyber security or reliability data. | | | | |
| CIP-007-2 | R7.2. | Prior to redeployment of such assets, the Responsible Entity shall, at a minimum, erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | N/A | N/A | N/A | N/A |
| CIP-007-2 | R7.3. | The Responsible Entity shall maintain records that such assets were disposed of or redeployed in accordance with documented procedures. | N/A | N/A | N/A | N/A |
| CIP-007-2 | R8 | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of all Cyber Assets within the Electronic Security Perimeter at least annually. The vulnerability assessment shall include, at a minimum, the following: | N/A | N/A | N/A | The Responsible Entity did not perform a Vulnerability Assessment on one or more Cyber Assets within the Electronic Security Perimeter at least annually. OR The vulnerability assessment did not include one (1) or more of the subrequirements 8.1, 8.2, 8.3, 8.4. |
| CIP-007-2 | R8.1. | A document identifying the vulnerability assessment process; | N/A | N/A | N/A | N/A |
| CIP-007-2 | R8.2. | A review to verify that only ports and services required for operation of the Cyber Assets within the | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | Electronic Security Perimeter are enabled; | | | | |
| CIP-007-2 | R8.3. | A review of controls for default accounts; and, | N/A | N/A | N/A | N/A |
| CIP-007-2 | R8.4. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | N/A | N/A | N/A | N/A |
| CIP-007-2 | R9 | Documentation Review and Maintenance — The Responsible Entity shall review and update the documentation specified in Standard CIP-007-2 at least annually. Changes resulting from modifications to the systems or controls shall be documented within thirty calendar days of the change being completed. | N/A | N/A | The Responsible Entity did not review and update the documentation specified in Standard CIP-007-2 at least annually. OR The Responsible Entity did not document changes resulting from modifications to the systems or controls within thirty calendar days of the change being completed. | The Responsible Entity did not review and update the documentation specified in Standard CIP-007-2 at least annually and changes resulting from modifications to the systems or controls were not documented within thirty calendar days of the change being completed. |
| CIP-008-2 | R1. | Cyber Security Incident Response Plan — The Responsible Entity shall develop and maintain a Cyber Security Incident response plan and implement the plan in response to Cyber Security Incidents. The Cyber | N/A | N/A | The Responsible Entity has developed a Cyber Security Incident response plan that addresses all of the | The Responsible Entity has not developed a Cyber Security Incident response plan that addresses all of the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | Security Incident response plan shall address, at a minimum, the following: | | | components required by R1.1 through R1.6 but has not maintained the plan in accordance with those components. | components required by R1.1 through R1.6, or has not implemented the plan in response to a Cyber Security Incident. |
| CIP-008-2 | R1.1. | Procedures to characterize and classify events as reportable Cyber Security Incidents. | N/A | N/A | N/A | N/A |
| CIP-008-2 | R1.2. | Response actions, including roles and responsibilities of Cyber Security Incident response teams, Cyber Security Incident handling procedures, and communication plans. | N/A | N/A | N/A | N/A |
| CIP-008-2 | R1.3. | Process for reporting Cyber Security Incidents to the Electricity Sector Information Sharing and Analysis Center (ES-ISAC). The Responsible Entity must ensure that all reportable Cyber Security Incidents are reported to the ES-ISAC either directly or through an intermediary. | N/A | N/A | N/A | N/A |
| CIP-008-2 | R1.4. | Process for updating the Cyber Security Incident response plan within thirty calendar days of any changes. | N/A | N/A | N/A | N/A |
| CIP-008-2 | R1.5. | Process for ensuring that the Cyber Security Incident response plan is reviewed at least annually. | N/A | N/A | N/A | N/A |
| CIP-008-2 | R1.6. | Process for ensuring the Cyber Security Incident response plan is tested at least annually. A test of the Cyber Security Incident response plan can range from a paper drill, to | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | a full operational exercise, to the response to an actual incident. Testing the Cyber Security Incident response plan does not require removing a component or system from service during the test. | | | | |
| CIP-008-2 | R2 | Cyber Security Incident Documentation — The Responsible Entity shall keep relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 for three calendar years. | N/A | N/A | N/A | The Responsible Entity has not kept relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 for at least three calendar years. |
| CIP-009-2 | R1 | Recovery Plans — The Responsible Entity shall create and annually review recovery plan(s) for Critical Cyber Assets. The recovery plan(s) shall address at a minimum the following: | N/A | N/A | N/A | The Responsible Entity has not created or has not annually reviewed their recovery plan(s) for Critical Cyber Assets OR has created a plan but did not address one or more of the requirements CIP- 009-1 R1.1 and R1.2. |
| CIP-009-2 | R1.1. | Specify the required actions in response to events or conditions of varying duration and severity that would activate the recovery plan(s). | N/A | N/A | N/A | N/A |
| CIP-009-2 | R1.2. | Define the roles and responsibilities of responders. | N/A | N/A | N/A | N/A |

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| CIP-009-2 R2 | Exercises — The recovery plan(s) shall be exercised at least annually. An exercise of the recovery plan(s) can range from a paper drill, to a full operational exercise, to recovery from an actual incident. | N/A | N/A | N/A | The Responsible Entity's recovery plan(s) have not been exercised at least annually. |
| CIP-009-2 R3 | Change Control — Recovery plan(s) shall be updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. Updates shall be communicated to personnel responsible for the activation and implementation of the recovery plan(s) within thirty calendar days of the change being completed. | N/A | N/A | N/A | The Responsible Entity's recovery plan(s) have not been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. OR The Responsible Entity's recovery plan(s) have been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident but the updates were not communicated to personnel responsible for the activation and implementation of the recovery plan(s) |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | within thirty calendar days of the change. |
| CIP-009-2 | R4 | Backup and Restore — The recovery plan(s) shall include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. For example, backups may include spare electronic components or equipment, written documentation of configuration settings, tape backup, etc. | N/A | N/A | N/A | The Responsible Entity's recovery plan(s) do not include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. |
| CIP-009-2 | R5 | Testing Backup Media — Information essential to recovery that is stored on backup media shall be tested at least annually to ensure that the information is available. Testing can be completed off site. | N/A | N/A | N/A | The Responsible Entity's information essential to recovery that is stored on backup media has not been tested at least annually to ensure that the information is available. |

VRFs

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| CIP-002-2 | R1. | Critical Asset Identification Method — The Responsible Entity shall identify and document a risk-based assessment methodology to use to identify its Critical Assets. | MEDIUM |
| CIP-002-2 | R1.1 | The Responsible Entity shall maintain documentation describing its risk-based assessment methodology that includes procedures and evaluation criteria. | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| CIP-002-2 | R1.2 | The risk-based assessment shall consider the following assets: | MEDIUM |
| CIP-002-2 | R1.2.1. | Control centers and backup control centers performing the functions of the entities listed in the Applicability section of this standard. | LOWER |
| CIP-002-2 | R1.2.2. | Transmission substations that support the reliable operation of the Bulk Electric System. | LOWER |
| CIP-002-2 | R1.2.3. | Generation resources that support the reliable operation of the Bulk Electric System. | LOWER |
| CIP-002-2 | R1.2.4. | Systems and facilities critical to system restoration, including blackstart generators and substations in the electrical path of transmission lines used for initial system restoration. | LOWER |
| CIP-002-2 | R1.2.5. | Systems and facilities critical to automatic load shedding under a common control system capable of shedding 300 MW or more. | LOWER |
| CIP-002-2 | R1.2.6. | Special Protection Systems that support the reliable operation of the Bulk Electric System. | LOWER |
| CIP-002-2 | R1.2.7. | Any additional assets that support the reliable operation of the Bulk Electric System that the Responsible Entity deems appropriate to include in its assessment. | LOWER |
| CIP-002-2 | R2. | Critical Asset Identification — The Responsible Entity shall develop a list of its identified Critical Assets determined through an annual application of the risk-based assessment methodology required in R1. The Responsible Entity shall review this list at least annually, and update it as necessary. | HIGH |
| CIP-002-2 | R3. | Critical Cyber Asset Identification — Using the list of Critical Assets developed pursuant to Requirement R2, the Responsible Entity shall develop a list of associated Critical Cyber Assets essential to the operation of the Critical Asset. Examples at control centers and backup control centers include systems and facilities at master and remote sites that provide monitoring and control, automatic generation control, real-time power system modeling, and real-time inter-utility data exchange. The Responsible Entity shall review this list at least annually, and update it as necessary. For the purpose of Standard CIP- 002-2, Critical Cyber Assets are further qualified to be those having at least one of the following characteristics: | HIGH |
| CIP-002-2 | R3.1 | The Cyber Asset uses a routable protocol to communicate outside the Electronic Security Perimeter; or, | LOWER |
| CIP-002-2 | R3.2. | The Cyber Asset uses a routable protocol within a control center; or, | LOWER |
| CIP-002-2 | R3.3. | The Cyber Asset is dial-up accessible. | LOWER |
| CIP-002-2 | R4. | Annual Approval — The senior manager or delegate(s) shall approve annually the risk- based assessment methodology, the list of Critical Assets and the list of Critical Cyber Assets. Based on Requirements R1, R2, and R3 the Responsible Entity may determine that it has no Critical Assets or Critical Cyber Assets. The Responsible Entity shall keep a signed and dated record of the senior manager or delegate(s)'s approval of the risk- | LOWER |

| Standard | Requirement | Text of Requirement | VRF |
|-----------|-------------|---|--------|
| Number | Number | based assessment methodology, the list of Critical Assets and the list of Critical Cyber | |
| | | Assets (even if such lists are null.) | |
| CIP-003-2 | R1. | Cyber Security Policy — The Responsible Entity shall document and implement a cyber security policy that represents management's commitment and ability to secure its Critical | MEDIUM |
| | | Cyber Assets. The Responsible Entity shall, at minimum, ensure the following: | |
| CIP-003-2 | R1.1. | The cyber security policy addresses the requirements in Standards CIP-002-2 through | LOWER |
| | | CIP-009-2, including provision for emergency situations. | |
| CIP-003-2 | R1.2. | The cyber security policy is readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets. | LOWER |
| CIP-003-2 | R1.3 | Annual review and approval of the cyber security policy by the senior manager assigned pursuant to R2. | LOWER |
| CIP-003-2 | R2. | Leadership — The Responsible Entity shall assign a senior manager with overall responsibility for leading and managing the entity's implementation of, and adherence to, Standards CIP-002 through CIP-009. | MEDIUM |
| CIP-003-2 | R2.1. | The senior manager shall be identified by name, title, and date of designation. | LOWER |
| CIP-003-2 | R2.2. | Changes to the senior manager must be documented within thirty calendar days of the effective date. | LOWER |
| CIP-003-2 | R2.3. | Where allowed by Standards CIP-002-2 through CIP-009-2, the senior manager may delegate authority for specific actions to a named delegate or delegates. These delegations shall be documented in the same manner as R2.1 and R2.2, and approved by the senior manager. | LOWER |
| CIP-003-2 | R2.4 | The senior manager or delegate(s), shall authorize and document any exception from the requirements of the cyber security policy. | LOWER |
| CIP-003-2 | R3. | Exceptions — Instances where the Responsible Entity cannot conform to its cyber security policy must be documented as exceptions and authorized by the senior manager or delegate(s). | LOWER |
| CIP-003-2 | R3.1. | Exceptions to the Responsible Entity's cyber security policy must be documented within thirty days of being approved by the senior manager or delegate(s). | LOWER |
| CIP-003-2 | R3.2. | Documented exceptions to the cyber security policy must include an explanation as to why the exception is necessary and any compensating measures. | LOWER |
| CIP-003-2 | R3.3. | Authorized exceptions to the cyber security policy must be reviewed and approved annually by the senior manager or delegate(s) to ensure the exceptions are still required and valid. Such review and approval shall be documented. | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| CIP-003-2 | R4. | Information Protection — The Responsible Entity shall implement and document a program to identify, classify, and protect information associated with Critical Cyber Assets. | MEDIUM |
| CIP-003-2 | R4.1. | The Critical Cyber Asset information to be protected shall include, at a minimum and regardless of media type, operational procedures, lists as required in Standard CIP-002-2, network topology or similar diagrams, floor plans of computing centers that contain Critical Cyber Assets, equipment layouts of Critical Cyber Assets, disaster recovery plans, incident response plans, and security configuration information. | MEDIUM |
| CIP-003-2 | R4.2. | The Responsible Entity shall classify information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. | LOWER |
| CIP-003-2 | R4.3. | The Responsible Entity shall, at least annually, assess adherence to its Critical Cyber Asset information protection program, document the assessment results, and implement an action plan to remediate deficiencies identified during the assessment. | LOWER |
| CIP-003-2 | R5. | Access Control — The Responsible Entity shall document and implement a program for managing access to protected Critical Cyber Asset information. | LOWER |
| CIP-003-2 | R5.1. | The Responsible Entity shall maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information. | LOWER |
| CIP-003-2 | R5.1.1. | Personnel shall be identified by name, title, and the information for which they are responsible for authorizing access. | LOWER |
| CIP-003-2 | R5.1.2. | The list of personnel responsible for authorizing access to protected information shall be verified at least annually. | LOWER |
| CIP-003-2 | R5.2. | The Responsible Entity shall review at least annually the access privileges to protected information to confirm that access privileges are correct and that they correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities. | LOWER |
| CIP-003-2 | R5.3. | The Responsible Entity shall assess and document at least annually the processes for controlling access privileges to protected information. | LOWER |
| CIP-003-2 | R6. | Change Control and Configuration Management — The Responsible Entity shall establish and document a process of change control and configuration management for adding, modifying, replacing, or removing Critical Cyber Asset hardware or software, and implement supporting configuration management activities to identify, control and document all entity or vendor related changes to hardware and software components of Critical Cyber Assets pursuant to the change control process. | LOWER |
| CIP-004-2 | R1. | Awareness — The Responsible Entity shall establish, document, implement, and maintain a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security practices. The program shall include security awareness reinforcement on | LOWER |

| Standard | Requirement | Text of Requirement | VRF |
|-----------|-------------|--|--------|
| Number | Number | | |
| | | at least a quarterly basis using mechanisms such as: | |
| | | • 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.). | |
| CIP-004-2 | R2. | Training — The Responsible Entity shall establish, document, implement, and maintain | LOWER |
| | | an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. The cyber security | |
| | | training program shall be reviewed annually, at a minimum, and shall be updated | |
| | | whenever necessary. | |
| CIP-004-2 | R2.1. | This program will ensure that all personnel having such access to Critical Cyber Assets, | MEDIUM |
| | 112.1. | including contractors and service vendors, are trained prior to their being granted such | |
| | | access except in specified circumstances such as an emergency. | |
| CIP-004-2 | R2.2. | Training shall cover the policies, access controls, and procedures as developed for the | MEDIUM |
| | | Critical Cyber Assets covered by CIP-004-2, and include, at a minimum, the following | |
| | | required items appropriate to personnel roles and responsibilities: | |
| CIP-004-2 | R2.2.1. | The proper use of Critical Cyber Assets; | LOWER |
| CIP-004-2 | R2.2.2. | Physical and electronic access controls to Critical Cyber Assets; | LOWER |
| CIP-004-2 | R2.2.3. | The proper handling of Critical Cyber Asset information; and, | LOWER |
| CIP-004-2 | R2.2.4. | Action plans and procedures to recover or re-establish Critical Cyber Assets and access thereto following a Cyber Security Incident. | MEDIUM |
| CIP-004-2 | R2.3. | The Responsible Entity shall maintain documentation that training is conducted at least | LOWER |
| | | annually, including the date the training was completed and attendance records. | |
| CIP-004-2 | R3. | Personnel Risk Assessment — The Responsible Entity shall have a documented personnel | MEDIUM |
| | | risk assessment program, in accordance with federal, state, provincial, and local laws, | |
| | | and subject to existing collective bargaining unit agreements, for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. A | |
| | | personnel risk assessment shall be conducted pursuant to that program prior to such | |
| | | personnel being granted such access except in specified circumstances such as an | |
| | | emergency. | |
| | | The personnel risk assessment program shall at a minimum include: | |
| CIP-004-2 | R3.1. | The Responsible Entity shall ensure that each assessment conducted include, at least, | LOWER |
| | | identity verification (e.g., Social Security Number verification in the U.S.) and sevenyear | |
| | | criminal check. The Responsible Entity may conduct more detailed reviews, as | |
| | | permitted by law and subject to existing collective bargaining unit agreements, | |
| | | depending upon the criticality of the position. | |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| CIP-004-2 | R3.2. | The Responsible Entity shall update each personnel risk assessment at least every seven years after the initial personnel risk assessment or for cause. | LOWER |
| CIP-004-2 | R3.3. | The Responsible Entity shall document the results of personnel risk assessments of its personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets, and that personnel risk assessments of contractor and service vendor personnel with such access are conducted pursuant to Standard CIP-004-2. | LOWER |
| CIP-004-2 | R4. | Access — The Responsible Entity shall maintain list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets. | LOWER |
| CIP-004-2 | R4.1. | The Responsible Entity shall review the list(s) of its personnel who have such access to Critical Cyber Assets quarterly, and update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, or any change in the access rights of such personnel. The Responsible Entity shall ensure access list(s) for contractors and service vendors are properly maintained. | LOWER |
| CIP-004-2 | R4.2. | The Responsible Entity shall revoke such access to Critical Cyber Assets within 24 hours for personnel terminated for cause and within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. | LOWER |
| CIP-005-2 | R1. | Electronic Security Perimeter — The Responsible Entity shall ensure that every Critical Cyber Asset resides within an Electronic Security Perimeter. The Responsible Entity shall identify and document the Electronic Security Perimeter(s) and all access points to the perimeter(s). | MEDIUM |
| CIP-005-2 | R1.1. | Access points to the Electronic Security Perimeter(s) shall include any externally connected communication end point (for example, dial-up modems) terminating at any device within the Electronic Security Perimeter(s). | MEDIUM |
| CIP-005-2 | R1.2. | For a dial-up accessible Critical Cyber Asset that uses a non-routable protocol, the Responsible Entity shall define an Electronic Security Perimeter for that single access point at the dial-up device. | MEDIUM |
| CIP-005-2 | R1.3. | Communication links connecting discrete Electronic Security Perimeters shall not be considered part of the Electronic Security Perimeter. However, end points of these communication links within the Electronic Security Perimeter(s) shall be considered access points to the Electronic Security Perimeter(s). | MEDIUM |
| CIP-005-2 | R1.4. | Any non-critical Cyber Asset within a defined Electronic Security Perimeter shall be identified and protected pursuant to the requirements of Standard CIP-005-2. | MEDIUM |
| CIP-005-2 | R1.5. | Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall be afforded the protective measures as a specified in Standard CIP- 003-2; Standard CIP-004-2 Requirement R3; Standard CIP-005-2 Requirements R2 and R3; Standard CIP-006-2 Requirement R3; Standard CIP-007-2 Requirements R1 and | MEDIUM |

| Standard | Requirement | Text of Requirement | VRF |
|-----------|-------------|--|--------|
| Number | Number | | |
| | | R3 through R9; Standard CIP-008-2; and Standard CIP-009-2. | |
| CIP-005-2 | R1.6. | The Responsible Entity shall maintain documentation of Electronic Security Perimeter(s), all interconnected Critical and non-critical Cyber Assets within the Electronic Security Perimeter(s), all electronic access points to the Electronic Security Perimeter(s) and the Cyber Assets deployed for the access control and monitoring of these access points. | LOWER |
| CIP-005-2 | R2. | Electronic Access Controls — The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s). | MEDIUM |
| CIP-005-2 | R2.1. | These processes and mechanisms shall use an access control model that denies access by default, such that explicit access permissions must be specified. | MEDIUM |
| CIP-005-2 | R2.2. | At all access points to the Electronic Security Perimeter(s), the Responsible Entity shall enable only ports and services required for operations and for monitoring Cyber Assets within the Electronic Security Perimeter, and shall document, individually or by specified grouping, the configuration of those ports and services. | MEDIUM |
| CIP-005-2 | R2.3. | The Responsible Entity shall implement and maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s). | MEDIUM |
| CIP-005-2 | R2.4. | Where external interactive access into the Electronic Security Perimeter has been enabled, the Responsible Entity shall implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible. | MEDIUM |
| CIP-005-2 | R2.5. | The required documentation shall, at least, identify and describe: | LOWER |
| CIP-005-2 | R2.5.1. | The processes for access request and authorization. | LOWER |
| CIP-005-2 | R2.5.2. | The authentication methods. | LOWER |
| CIP-005-2 | R2.5.3. | The review process for authorization rights, in accordance with Standard CIP-004-2 Requirement R4. | LOWER |
| CIP-005-2 | R2.5.4. | The controls used to secure dial-up accessible connections. | LOWER |
| CIP-005-2 | R2.6. | Appropriate Use Banner — Where technically feasible, electronic access control devices shall display an appropriate use banner on the user screen upon all interactive access attempts. The Responsible Entity shall maintain a document identifying the content of the banner. | LOWER |
| CIP-005-2 | R3. | Monitoring Electronic Access — The Responsible Entity shall implement and document an electronic or manual process(es) for monitoring and logging access at access points to the Electronic Security Perimeter(s) twenty-four hours a day, seven days a week. | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-005-2 | R3.1. | For dial-up accessible Critical Cyber Assets that use non-routable protocols, the Responsible Entity shall implement and document monitoring process(es) at each access point to the dial-up device, where technically feasible. | MEDIUM |
| CIP-005-2 | R3.2. | Where technically feasible, the security monitoring process(es) shall detect and alert for attempts at or actual unauthorized accesses. These alerts shall provide for appropriate notification to designated response personnel. Where alerting is not technically feasible, the Responsible Entity shall review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. | MEDIUM |
| CIP-005-2 | R4. | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of the electronic access points to the Electronic Security Perimeter(s) at least annually. The vulnerability assessment shall include, at a minimum, the following: | MEDIUM |
| CIP-005-2 | R4.1. | A document identifying the vulnerability assessment process; | LOWER |
| CIP-005-2 | R4.2. | A review to verify that only ports and services required for operations at these access points are enabled; | MEDIUM |
| CIP-005-2 | R4.3. | The discovery of all access points to the Electronic Security Perimeter; | MEDIUM |
| CIP-005-2 | R4.4. | A review of controls for default accounts, passwords, and network management community strings; | MEDIUM |
| CIP-005-2 | R4.5. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | MEDIUM |
| CIP-005-2 | R5. | Documentation Review and Maintenance — The Responsible Entity shall review, update, and maintain all documentation to support compliance with the requirements of Standard CIP-005-2. | LOWER |
| CIP-005-2 | R5.1. | The Responsible Entity shall ensure that all documentation required by Standard CIP- 005-2 reflect current configurations and processes and shall review the documents and procedures referenced in Standard CIP-005-2 at least annually. | LOWER |
| CIP-005-2 | R5.2. | The Responsible Entity shall update the documentation to reflect the modification of the network or controls within ninety calendar days of the change. | LOWER |
| CIP-005-2 | R5.3. | The Responsible Entity shall retain electronic access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-2. | LOWER |
| CIP-006-2 | R1. | Physical Security Plan — The Responsible Entity shall document, implement, and maintain a physical security plan, approved by the senior manager or delegate(s) that shall address, at a minimum, the following: | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-006-2 | R1.1. | All Cyber Assets within an Electronic Security Perimeter shall reside within an identified Physical Security Perimeter. Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity shall deploy and document alternative measures to control physical access to such Cyber Assets. | MEDIUM |
| CIP-006-2 | R1.2. | Identification of all physical access points through each Physical Security Perimeter and measures to control entry at those access points. | MEDIUM |
| CIP-006-2 | R1.3 | Processes, tools, and procedures to monitor physical access to the perimeter(s). | MEDIUM |
| CIP-006-2 | R1.4 | Appropriate use of physical access controls as described in Requirement R4 including visitor pass management, response to loss, and prohibition of inappropriate use of physical access controls. | MEDIUM |
| CIP-006-2 | R1.5 | Review of access authorization requests and revocation of access authorization, in accordance with CIP-004-2 Requirement R4. | MEDIUM |
| CIP-006-2 | R1.6 | Continuous escorted access within the Physical Security Perimeter of personnel not authorized for unescorted access. | MEDIUM |
| CIP-006-2 | R1.7 | Update of the physical security plan within thirty calendar days of the completion of any physical security system redesign or reconfiguration, including, but not limited to, addition or removal of access points through the Physical Security Perimeter, physical access controls, monitoring controls, or logging controls. | LOWER |
| CIP-006-2 | R1.8 | Annual review of the physical security plan. | LOWER |
| CIP-006-2 | R2 | Protection of Physical Access Control Systems — Cyber Assets that authorize and/or log access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers, shall: | MEDIUM |
| CIP-006-2 | R2.1. | Be protected from unauthorized physical access. | MEDIUM |
| CIP-006-2 | R2.2. | Be afforded the protective measures specified in Standard CIP-003-2; Standard CIP-004-2 Requirement R3; Standard CIP-005-2 Requirements R2 and R3; Standard CIP-006-2 Requirements R4 and R5; Standard CIP-007-2; Standard CIP-008-2; and Standard CIP- 009-2. | MEDIUM |
| CIP-006-2 | R3 | Protection of Electronic Access Control Systems — Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall reside within an identified Physical Security Perimeter. | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-006-2 | R4 | Physical Access Controls — The Responsible Entity shall document and implement the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. The Responsible Entity shall implement one or more of the following physical access methods: | MEDIUM |
| | | • Card Key: A means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from one perimeter to another. | |
| | | Special Locks: These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. | |
| | | • Security Personnel: Personnel responsible for controlling physical access who may reside on-site or at a monitoring station. | |
| | | Other Authentication Devices: Biometric, keypad, token, or other equivalent devices that control physical access to the Critical Cyber Assets | |
| CIP-006-2 | R5 | Monitoring Physical Access — The Responsible Entity shall document and implement the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. Unauthorized access attempts shall be reviewed immediately and handled in accordance with the procedures specified in Requirement CIP-008-2. One or more of the following monitoring methods shall be used: | MEDIUM |
| | | • Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel responsible for response. | |
| | | • Human Observation of Access Points: Monitoring of physical access points by authorized personnel as specified in Requirement R4. | |
| CIP-006-2 | R6 | Logging Physical Access — Logging shall record sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. The Responsible Entity shall implement and document the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: | LOWER |
| | | • Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method. | |
| | | Video Recording: Electronic capture of video images of sufficient quality to | |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| | | determine identity. | |
| | | Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4 | |
| CIP-006-2 | R7 | Access Log Retention — The responsible entity shall retain physical access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-2. | LOWER |
| CIP-006-2 | R8 | Maintenance and Testing — The Responsible Entity shall implement a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly. The program must include, at a minimum, the following: | MEDIUM |
| CIP-006-2 | R8.1 | Testing and maintenance of all physical security mechanisms on a cycle no longer than three years. | MEDIUM |
| CIP-006-2 | R8.2 | Retention of testing and maintenance records for the cycle determined by the Responsible Entity in Requirement R8.1. | LOWER |
| CIP-006-2 | R8.3 | Retention of outage records regarding access controls, logging, and monitoring for a minimum of one calendar year. | LOWER |
| CIP-007-2 | R1. | Test Procedures — The Responsible Entity shall ensure that new Cyber Assets and significant changes to existing Cyber Assets within the Electronic Security Perimeter do not adversely affect existing cyber security controls. For purposes of Standard CIP-007-2, a significant change shall, at a minimum, include implementation of security patches, cumulative service packs, vendor releases, and version upgrades of operating systems, applications, database platforms, or other third-party software or firmware. | MEDIUM |
| CIP-007-2 | R1.1. | The Responsible Entity shall create, implement, and maintain cyber security test procedures in a manner that minimizes adverse effects on the production system or its operation. | LOWER |
| CIP-007-2 | R1.2. | The Responsible Entity shall document that testing is performed in a manner that reflects the production environment. | LOWER |
| CIP-007-2 | R1.3. | The Responsible Entity shall document test results. | LOWER |
| CIP-007-2 | R2. | Ports and Services — The Responsible Entity shall establish, document and implement a process to ensure that only those ports and services required for normal and emergency operations are enabled. | MEDIUM |
| CIP-007-2 | R2.1. | The Responsible Entity shall enable only those ports and services required for normal and emergency operations. | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-007-2 | R2.2. | The Responsible Entity shall disable other ports and services, including those used for testing purposes, prior to production use of all Cyber Assets inside the Electronic Security Perimeter(s). | MEDIUM |
| CIP-007-2 | R2.3. | In the case where unused ports and services cannot be disabled due to technical limitations, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | MEDIUM |
| CIP-007-2 | R3. | Security Patch Management — The Responsible Entity, either separately or as a component of the documented configuration management process specified in CIP-003-2 Requirement R6, shall establish, document and implement a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | LOWER |
| CIP-007-2 | R3.1. | The Responsible Entity shall document the assessment of security patches and security upgrades for applicability within thirty calendar days of availability of the patches or upgrades. | LOWER |
| CIP-007-2 | R3.2. | The Responsible Entity shall document the implementation of security patches. In any case where the patch is not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | LOWER |
| CIP-007-2 | R4. | Malicious Software Prevention — The Responsible Entity shall use anti-virus software and other malicious software ("malware") prevention tools, where technically feasible, to detect, prevent, deter, and mitigate the introduction, exposure, and propagation of malware on all Cyber Assets within the Electronic Security Perimeter(s). | MEDIUM |
| CIP-007-2 | R4.1. | The Responsible Entity shall document and implement anti-virus and malware prevention tools. In the case where anti-virus software and malware prevention tools are not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | MEDIUM |
| CIP-007-2 | R4.2. | The Responsible Entity shall document and implement a process for the update of anti-virus and malware prevention "signatures." The process must address testing and installing the signatures. | MEDIUM |
| CIP-007-2 | R5. | Account Management — The Responsible Entity shall establish, implement, and document technical and procedural controls that enforce access authentication of, and accountability for, all user activity, and that minimize the risk of unauthorized system access. | LOWER |
| CIP-007-2 | R5.1. | The Responsible Entity shall ensure that individual and shared system accounts and authorized access permissions are consistent with the concept of "need to know" with respect to work functions performed. | MEDIUM |
| CIP-007-2 | R5.1.1. | The Responsible Entity shall ensure that user accounts are implemented as approved by designated personnel. Refer to Standard CIP-003-2 Requirement R5. | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-007-2 | R5.1.2. | The Responsible Entity shall establish methods, processes, and procedures that generate logs of sufficient detail to create historical audit trails of individual user account access activity for a minimum of ninety days. | LOWER |
| CIP-007-2 | R5.1.3. | The Responsible Entity shall review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003-2 Requirement R5 and Standard CIP-004-2 Requirement R4. | MEDIUM |
| CIP-007-2 | R5.2. | The Responsible Entity shall implement a policy to minimize and manage the scope and acceptable use of administrator, shared, and other generic account privileges including factory default accounts. | LOWER |
| CIP-007-2 | R5.2.1. | The policy shall include the removal, disabling, or renaming of such accounts where possible. For such accounts that must remain enabled, passwords shall be changed prior to putting any system into service. | MEDIUM |
| CIP-007-2 | R5.2.2. | The Responsible Entity shall identify those individuals with access to shared accounts. | LOWER |
| CIP-007-2 | R5.2.3. | Where such accounts must be shared, the Responsible Entity shall have a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps for securing the account in the event of personnel changes (for example, change in assignment or termination). | MEDIUM |
| CIP-007-2 | R5.3. | At a minimum, the Responsible Entity shall require and use passwords, subject to the following, as technically feasible: | LOWER |
| CIP-007-2 | R5.3.1. | Each password shall be a minimum of six characters. | LOWER |
| CIP-007-2 | R5.3.2. | Each password shall consist of a combination of alpha, numeric, and "special" characters. | LOWER |
| CIP-007-2 | R5.3.3. | Each password shall be changed at least annually, or more frequently based on risk. | MEDIUM |
| CIP-007-2 | R6. | Security Status Monitoring — The Responsible Entity shall ensure that all Cyber Assets within the Electronic Security Perimeter, as technically feasible, implement automated tools or organizational process controls to monitor system events that are related to cyber security. | LOWER |
| CIP-007-2 | R6.1. | The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter. | MEDIUM |
| CIP-007-2 | R6.2. | The security monitoring controls shall issue automated or manual alerts for detected Cyber Security Incidents. | MEDIUM |
| CIP-007-2 | R6.3. | The Responsible Entity shall maintain logs of system events related to cyber security, where technically feasible, to support incident response as required in Standard CIP-008- 2. | MEDIUM |
| CIP-007-2 | R6.4. | The Responsible Entity shall retain all logs specified in Requirement R6 for ninety | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| Number | Number | calendar days. | |
| CIP-007-2 | R6.5. | The Responsible Entity shall review logs of system events related to cyber security and maintain records documenting review of logs. | LOWER |
| CIP-007-2 | R7. | Disposal or Redeployment — The Responsible Entity shall establish and implement formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-2. | LOWER |
| CIP-007-2 | R7.1. | Prior to the disposal of such assets, the Responsible Entity shall destroy or erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | LOWER |
| CIP-007-2 | R7.2. | Prior to redeployment of such assets, the Responsible Entity shall, at a minimum, erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | LOWER |
| CIP-007-2 | R7.3. | The Responsible Entity shall maintain records that such assets were disposed of or redeployed in accordance with documented procedures. | LOWER |
| CIP-007-2 | R8 | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of all Cyber Assets within the Electronic Security Perimeter at least annually. The vulnerability assessment shall include, at a minimum, the following: | LOWER |
| CIP-007-2 | R8.1. | A document identifying the vulnerability assessment process; | LOWER |
| CIP-007-2 | R8.2. | A review to verify that only ports and services required for operation of the Cyber Assets within the Electronic Security Perimeter are enabled; | MEDIUM |
| CIP-007-2 | R8.3. | A review of controls for default accounts; and, | MEDIUM |
| CIP-007-2 | R8.4. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | MEDIUM |
| CIP-007-2 | R9 | Documentation Review and Maintenance — The Responsible Entity shall review and update the documentation specified in Standard CIP-007-2 at least annually. Changes resulting from modifications to the systems or controls shall be documented within thirty calendar days of the change being completed. | LOWER |
| CIP-008-2 | R1. | Cyber Security Incident Response Plan — The Responsible Entity shall develop and maintain a Cyber Security Incident response plan and implement the plan in response to Cyber Security Incidents. The Cyber Security Incident response plan shall address, at a minimum, the following: | LOWER |
| CIP-008-2 | R1.1. | Procedures to characterize and classify events as reportable Cyber Security Incidents. | LOWER |
| CIP-008-2 | R1.2. | Response actions, including roles and responsibilities of Cyber Security Incident | LOWER |

| Standard Number | | | VRF |
|--------------------|-------|--|--------|
| | | response teams, Cyber Security Incident handling procedures, and communication plans. | |
| CIP-008-2 | R1.3. | Process for reporting Cyber Security Incidents to the Electricity Sector Information Sharing and Analysis Center (ES-ISAC). The Responsible Entity must ensure that all reportable Cyber Security Incidents are reported to the ES-ISAC either directly or through an intermediary. | LOWER |
| CIP-008-2 | R1.4. | Process for updating the Cyber Security Incident response plan within thirty calendar days of any changes. | LOWER |
| CIP-008-2 | R1.5. | Process for ensuring that the Cyber Security Incident response plan is reviewed at least annually. | LOWER |
| CIP-008-2 | R1.6. | Process for ensuring the Cyber Security Incident response plan is tested at least annually. A test of the Cyber Security Incident response plan can range from a paper drill, to a full operational exercise, to the response to an actual incident. Testing the Cyber Security Incident response plan does not require removing a component or system from service during the test. | LOWER |
| CIP-008-2 | R2 | Cyber Security Incident Documentation — The Responsible Entity shall keep relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 for three calendar years. | LOWER |
| CIP-009-2 | R1 | Recovery Plans — The Responsible Entity shall create and annually review recovery plan(s) for Critical Cyber Assets. The recovery plan(s) shall address at a minimum the following: | MEDIUM |
| CIP-009-2 | R1.1. | Specify the required actions in response to events or conditions of varying duration and severity that would activate the recovery plan(s). | MEDIUM |
| CIP-009-2 | R1.2. | Define the roles and responsibilities of responders. | MEDIUM |
| CIP-009-2 | R2 | Exercises — The recovery plan(s) shall be exercised at least annually. An exercise of the recovery plan(s) can range from a paper drill, to a full operational exercise, to recovery from an actual incident. | LOWER |
| CIP-009-2 | R3 | Change Control — Recovery plan(s) shall be updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. Updates shall be communicated to personnel responsible for the activation and implementation of the recovery plan(s) within thirty calendar days of the change being completed. | LOWER |
| CIP-009-2 | R4 | Backup and Restore — The recovery plan(s) shall include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. For example, backups may include spare electronic components or equipment, written documentation of configuration settings, tape backup, etc. | LOWER |
| CIP-009-2 | R5 | Testing Backup Media — Information essential to recovery that is stored on backup | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| | | media shall be tested at least annually to ensure that the information is available. Testing can be completed off site. | |

CIP Version 2 Violation Severity Levels and Violation Risk Factors

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|---|--|--|
| CIP-002-2 | R1. | Critical Asset Identification Method — The Responsible Entity shall identify and document a risk-based assessment methodology to use to identify its Critical Assets. | N/A | N/A | N/A | The responsible entity has not documented a risk- based assessment methodology to use to identify its Critical Assets as specified in R1. |
| CIP-002-2 | R1.1 | The Responsible Entity shall maintain documentation describing its risk- based assessment methodology that includes procedures and evaluation criteria. | N/A | The Responsible Entity maintained documentation describing its risk- based assessment methodology which includes evaluation criteria, but does not include procedures. | The Responsible Entity maintained documentation describing its risk- based assessment methodology that includes procedures but does not include evaluation criteria. | The Responsible Entity did not maintain documentation describing its risk- based assessment methodology that includes procedures and evaluation criteria. |
| CIP-002-2 | R1.2 | The risk-based assessment shall consider the following assets: | N/A | N/A | N/A | The Responsible Entity did not consider all of the asset types listed in R1.2.1 through R1.2.7 in its risk- based assessment. |
| CIP-002-2 | R1.2.1. | Control centers and backup control centers performing the functions of the entities listed in the Applicability section of this standard. | N/A | N/A | N/A | N/A |
| CIP-002-2 | R1.2.2. | Transmission substations that support the reliable operation of the Bulk Electric System. | N/A | N/A | N/A | N/A |
| CIP-002-2 | R1.2.3. | Generation resources that support | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|--|---|
| | | the reliable operation of the Bulk Electric System. | | | | |
| CIP-002-2 | R1.2.4. | Systems and facilities critical to system restoration, including blackstart generators and substations in the electrical path of transmission lines used for initial system restoration. | N/A | N/A | N/A | N/A |
| CIP-002-2 | R1.2.5. | Systems and facilities critical to automatic load shedding under a common control system capable of shedding 300 MW or more. | N/A | N/A | N/A | N/A |
| CIP-002-2 | R1.2.6. | Special Protection Systems that support the reliable operation of the Bulk Electric System. | N/A | N/A | N/A | N/A |
| CIP-002-2 | R1.2.7. | Any additional assets that support the reliable operation of the Bulk Electric System that the Responsible Entity deems appropriate to include in its assessment. | N/A | N/A | N/A | N/A |
| CIP-002-2 | R2. | Critical Asset Identification — The Responsible Entity shall develop a list of its identified Critical Assets determined through an annual application of the risk-based assessment methodology required in R1. The Responsible Entity shall review this list at least annually, and update it as necessary. | N/A | N/A | The Responsible Entity has developed a list of Critical Assets but the list has not been reviewed and updated annually as required. | The Responsible Entity did not develop a list of its identified Critical Assets even if such list is null. |
| CIP-002-2 | R3. | Critical Cyber Asset Identification — Using the list of Critical Assets developed pursuant to Requirement R2, the Responsible Entity shall develop a list of associated Critical Cyber Assets essential to the operation of the Critical Asset. Examples at control centers and | N/A | N/A | The Responsible Entity has developed a list of associated Critical Cyber Assets essential to the operation of the Critical Asset list as per requirement R2 | The Responsible Entity did not develop a list of associated Critical Cyber Assets essential to the operation of the Critical Asset list as |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|---|---|
| | | backup control centers include systems and facilities at master and remote sites that provide monitoring and control, automatic generation control, real-time power system modeling, and real-time inter-utility data exchange. The Responsible Entity shall review this list at least annually, and update it as necessary. For the purpose of Standard CIP-002- 2, Critical Cyber Assets are further qualified to be those having at least one of the following characteristics: | | | but the list has not been reviewed and updated annually as required. | per requirement R2 even if such list is null. |
| CIP-002-2 | R3.1 | The Cyber Asset uses a routable protocol to communicate outside the Electronic Security Perimeter; or, | N/A | N/A | N/A | A Cyber Asset essential to the operation of the Critical Asset was identified that met the criteria in this requirement but was not included in the Critical Cyber Asset List. |
| CIP-002-2 | R3.2. | The Cyber Asset uses a routable protocol within a control center; or, | N/A | N/A | N/A | A Cyber Asset essential to the operation of the Critical Asset was identified that met the criteria in this requirement but was not included in the Critical Cyber Asset List. |
| CIP-002-2 | R3.3. | The Cyber Asset is dial-up accessible. | N/A | N/A | N/A | A Cyber Asset essential to the operation of the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|---|---|--|
| | | | | | | Critical Asset was identified that met the criteria in this requirement but was not included in the Critical Cyber Asset List. |
| CIP-002-2 | R4. | Annual Approval — The senior manager or delegate(s) shall approve annually the risk-based assessment methodology, the list of Critical Assets and the list of Critical Cyber Assets. Based on Requirements R1, R2, and R3 the Responsible Entity may determine that it has no Critical Assets or Critical Cyber Assets. The Responsible Entity shall keep a signed and dated record of the senior manager or delegate(s)'s approval of the risk-based assessment methodology, the list of Critical Assets and the list of Critical Cyber Assets (even if such lists are null.) | N/A | The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s)'s annual approval of the risk- based assessment methodology, the list of Critical Assets or the list of Critical Cyber Assets (even if such lists are null.) | The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s)'s annual approval of two of the following: the risk-based assessment methodology, the list of Critical Assets or the list of Critical Cyber Assets (even if such lists are null.) | The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s) annual approval of 1) A risk based assessment methodology for identification of Critical Assets, 2) a signed and dated approval of the list of Critical Assets, nor 3) a signed and dated approval of the list of Critical Cyber Assets (even if such lists are null.) |
| CIP-003-2 | R1. | Cyber Security Policy — The Responsible Entity shall document and implement a cyber security policy that represents management's commitment and ability to secure its Critical Cyber Assets. The Responsible Entity shall, at minimum, ensure the following: | N/A | N/A | N/A | The Responsible Entity has not documented or implemented a cyber security policy. |
| CIP-003-2 | R1.1. | The cyber security policy addresses | N/A | N/A | N/A | The Responsible |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|----------|--|
| | | the requirements in Standards CIP- 002-2 through CIP-009-2, including provision for emergency situations. | | | | Entity's cyber security policy does not address all the requirements in Standards CIP-002 through CIP-009, including provision for emergency situations. |
| CIP-003-2 | R1.2. | The cyber security policy is readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets. | N/A | N/A | N/A | The Responsible Entity's cyber security policy is not readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets. |
| CIP-003-2 | R1.3 | Annual review and approval of the cyber security policy by the senior manager assigned pursuant to R2. | N/A | N/A | N/A | The Responsible Entity's senior manager, assigned pursuant to R2, did not complete the annual review and approval of its cyber security policy. |
| CIP-003-2 | R2. | Leadership — The Responsible Entity shall assign a single senior manager with overall responsibility and authority for leading and managing the entity's implementation of, and adherence to, Standards CIP-002-2 through CIP-009-2. | N/A | N/A | N/A | The Responsible Entity has not assigned a single senior manager with overall responsibility and authority for leading and managing the entity's implementation of, and adherence to, |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|--|--|
| | | | | | | Standards CIP-002 through CIP-009. |
| CIP-003-2 | R2.1. | The senior manager shall be identified by name, title, and date of designation. | N/A | N/A | N/A | Identification of the senior manager is missing one of the following: name, title, or date of designation. |
| CIP-003-2 | R2.2. | Changes to the senior manager must be documented within thirty calendar days of the effective date. | N/A | N/A | N/A | Changes to the senior manager were not documented within 30 days of the effective date. |
| CIP-003-2 | R2.3. | Where allowed by Standards CIP- 002-2 through CIP-009-2, the senior manager may delegate authority for specific actions to a named delegate or delegates. These delegations shall be documented in the same manner as R2.1 and R2.2, and approved by the senior manager. | N/A | N/A | The identification of a senior manager's delegate does not include at least one of the following; name, title, or date of the designation, OR The document is not approved by the senior manager, OR Changes to the delegated authority | A senior manager's delegate is not identified by name, title, and date of designation; the document delegating the authority does not identify the authority being delegated; the document delegating the authority is not approved by the senior manager; AND |
| | | | | | are not documented within thirty | changes to the delegated authority |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | calendar days of the effective date. | are not documented within thirty calendar days of the effective date. |
| CIP-003-2 | R2.4 | The senior manager or delegate(s), shall authorize and document any exception from the requirements of the cyber security policy. | N/A | N/A | N/A | The senior manager or delegate(s) did not authorize and document any exceptions from the requirements of the cyber security policy as required. |
| CIP-003-2 | R3. | Exceptions — Instances where the Responsible Entity cannot conform to its cyber security policy must be documented as exceptions and authorized by the senior manager or delegate(s). | N/A | N/A | In Instances where the Responsible Entity cannot conform to its cyber security policy, in R1, exceptions were documented, but were not authorized by the senior manager or delegate(s). | In Instances where the Responsible Entity cannot conform to its cyber security policy, in R1, exceptions were not documented. |
| CIP-003-2 | R3.1. | Exceptions to the Responsible Entity's cyber security policy must be documented within thirty days of being approved by the senior manager or delegate(s). | N/A | N/A | N/A | Exceptions to the Responsible Entity's cyber security policy were not documented within 30 days of being approved by the senior manager or delegate(s). |
| CIP-003-2 | R3.2. | Documented exceptions to the cyber security policy must include an explanation as to why the exception | N/A | N/A | The Responsible Entity has a documented | The Responsible Entity has a documented |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|---|--|
| | | is necessary and any compensating measures. | | | exception to the cyber security policy (pertaining to CIP 002 through CIP 009) in R1 but did not include either : 1) an explanation as to why the exception is necessary, or 2) any compensating measures. | exception to the cyber security policy (pertaining to CIP 002 through CIP 009) in R1 but did not include both : 1) an explanation as to why the exception is necessary, and 2) any compensating measures. |
| CIP-003-2 | R3.3. | Authorized exceptions to the cyber security policy must be reviewed and approved annually by the senior manager or delegate(s) to ensure the exceptions are still required and valid. Such review and approval shall be documented. | N/A | N/A | N/A | Exceptions to the cyber security policy were not reviewed or were not approved on an annual basis by the senior manager or delegate(s) to ensure the exceptions are still required and valid or the review and approval is not documented. |
| CIP-003-2 | R4. | Information Protection — The Responsible Entity shall implement and document a program to identify, classify, and protect information associated with Critical Cyber Assets. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document a program to identify, classify, and protect information associated with |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|---|--|
| | | | | | | Critical Cyber Assets. |
| CIP-003-2 | R4.1. | The Critical Cyber Asset information to be protected shall include, at a minimum and regardless of media type, operational procedures, lists as required in Standard CIP- 002-2, network topology or similar diagrams, floor plans of computing centers that contain Critical Cyber Assets, equipment layouts of Critical Cyber Assets, disaster recovery plans, incident response plans, and security configuration information. | N/A | N/A | The information protection program does not include one of the minimum information types to be protected as detailed in R4.1. | The information protection program does not include two or more of the minimum information types to be protected as detailed in R4.1. |
| CIP-003-2 | R4.2. | The Responsible Entity shall classify information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. | N/A | N/A | N/A | The Responsible Entity did not classify the information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. |
| CIP-003-2 | R4.3. | The Responsible Entity shall, at least annually, assess adherence to its Critical Cyber Asset information protection program, document the assessment results, and implement an action plan to remediate deficiencies identified during the assessment. | N/A | N/A | N/A | The Responsible Entity did not annually assess adherence to its Critical Cyber Asset information protection program, including documentation of the assessment results, OR The Responsible Entity did not |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | implement an action plan to remediate deficiencies identified during the assessment. |
| CIP-003-2 | R5. | Access Control — The Responsible Entity shall document and implement a program for managing access to protected Critical Cyber Asset information. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document a program for managing access to protected Critical Cyber Asset information. |
| CIP-003-2 | R5.1. | The Responsible Entity shall maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information. | N/A | N/A | The Responsible Entity maintained a list of designated personnel for authorizing either logical or physical access but not both. | The Responsible Entity did not maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information. |
| CIP-003-2 | R5.1.1. | Personnel shall be identified by name, title, and the information for which they are responsible for authorizing access. | N/A | N/A | The Responsible Entity did identify the personnel by name, title, and the information for which they are responsible for authorizing access, but the business phone is missing. | Personnel are not identified by name, title, or the information for which they are responsible for authorizing access. |
| CIP-003-2 | R5.1.2. | The list of personnel responsible for | N/A | N/A | N/A | The Responsible |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|----------|---|
| | | authorizing access to protected information shall be verified at least annually. | | | | Entity did not verify at least annually the list of personnel responsible for authorizing access to protected information. |
| CIP-003-2 | R5.2. | The Responsible Entity shall review at least annually the access privileges to protected information to confirm that access privileges are correct and that they correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities. | N/A | N/A | N/A | The Responsible Entity did not review at least annually the access privileges to protected information to confirm that access privileges are correct and that they correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities. |
| CIP-003-2 | R5.3. | The Responsible Entity shall assess and document at least annually the processes for controlling access privileges to protected information. | N/A | N/A | N/A | The Responsible Entity did not assess and document at least annually the processes for controlling access privileges to protected information. |
| CIP-003-2 | R6. | Change Control and Configuration Management — The Responsible Entity shall establish and document a process of change control and configuration management for | N/A | N/A | N/A | The Responsible Entity has not established or documented a change control |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|---|--|---|--|
| | | adding, modifying, replacing, or removing Critical Cyber Asset hardware or software, and implement supporting configuration management activities to identify, control and document all entity or vendor related changes to hardware and software components of Critical Cyber Assets pursuant to the change control process. | | | | process for the activities required in R6, OR The Responsible Entity has not established or documented a configuration management process for the activities required in R6. |
| CIP-004-2 | R1. | Awareness — The Responsible Entity shall establish, document, implement, and maintain a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security practices. The program shall include security awareness reinforcement on at least a quarterly basis using mechanisms such as: Direct communications (e.g. emails, memos, computer based training, etc.); Indirect communications (e.g. posters, intranet, brochures, etc.); Management support and | <u>N/A</u> The Responsible Entity established, implemented, and maintained but did not document a security awareness program to ensure personnel having authorized cyber or authorized dyber or authorized unescorted physical access to Critical Cyber Assets receive on going reinforcement in sound security practices. | <u>N/A</u> The Responsibility Entity did not provide security awareness reinforcement on at least a quarterly basis. | The Responsible Entity did document but did not establish, implement, nor maintain a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets receive on going reinforcement in sound security practices. The Responsible ^[1] Entity did not | The Responsible Entity did not establish, implement, maintain, <u>nor-or</u> document a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security practices. |

¹ Please note that FERC's January 20, 2011 Order on Version 2 And Version 3 Violation Risk Factors And Violation Severity Levels For Critical Infrastructure Protection Reliability Standards dictated "Responsible Entity" to be changed to "Responsibility Entity." NERC assumes FERC intended the VSL to read "Responsible Entity" and therefore is not making this change. NERC proposes to remove this footnote from the final approved list of VSLs.

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|---|---|--|--|
| | | reinforcement (e.g., presentations, meetings, etc.). | | | provide security awareness reinforcement on at least a quarterly basis. | |
| CIP-004-2 | R2. | Training — The Responsible Entity shall establish, document, implement, and maintain an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. The cyber security training program shall be reviewed annually, at a minimum, and shall be updated whenever necessary. | <u>N/A</u> The Responsible Entity established, implemented, and maintained but did not document an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. | <u>N/A</u> The Responsibility Entity did not review the training program on an annual basis. | The ResponsibleEntity did documentbut did notestablish,implement, normaintain an annualcyber securitytraining program forpersonnel havingauthorized cyber orauthorized physicalaccess to CriticalCyber Assets. TheResponsible[2] Entitydid not review thetraining program onan annual basis. | The Responsible Entity did not establish, implement, maintain, noror document an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. |
| CIP-004-2 | R2.1. | This program will ensure that all personnel having such access to Critical Cyber Assets, including contractors and service vendors, are trained prior to their being granted such access except in specified circumstances such as an emergency. | <u>N/A</u> At least one individual but less than 5% of personnel having authorized cyber or unescorted physical access to Critical Cyber Assets, including contractors and service vendors, were not trained | <u>N/A</u> At least 5% but less than 10% of all personnel having authorized cyber or unescorted physical access to Critical Cyber Assets, including contractors and service vendors, were not trained prior to their being | <u>N/A</u> At least 10% but less than 15% of all personnel having authorized cyber or unescorted physical access to Critical Cyber Assets, including contractors and service vendors, were not trained prior to their being | 15% or more of <u>Not</u> all personnel having authorized cyber or unescorted physical access to Critical Cyber Assets, including contractors and service vendors, were not trained prior to their being granted such access |

² Please see previous footnote. NERC proposes to remove this footnote from the final approved list of VSLs.

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|--|--|--|--|
| | | | prior to their being granted such access except in specified circumstances such as an emergency. | granted such access except in specified circumstances such as an emergency. | granted such access except in specified circumstances such as an emergency. | except in specified circumstances such as an emergency. |
| CIP-004-2 | R2.2. | Training shall cover the policies, access controls, and procedures as developed for the Critical Cyber Assets covered by CIP-004-2, and include, at a minimum, the following required items appropriate to personnel roles and responsibilities: | N/A | N/A | N/A | The training does not include one or more of the minimum topics as detailed in R2.2.1, R2.2.2, R2.2.3, R2.2.4. |
| CIP-004-2 | R2.2.1. | The proper use of Critical Cyber Assets; | N/A | N/A | N/A | N/A |
| CIP-004-2 | R2.2.2. | Physical and electronic access controls to Critical Cyber Assets; | N/A | N/A | N/A | N/A |
| CIP-004-2 | R2.2.3. | The proper handling of Critical Cyber Asset information; and, | N/A | N/A | N/A | N/A |
| CIP-004-2 | R2.2.4. | Action plans and procedures to recover or re-establish Critical Cyber Assets and access thereto following a Cyber Security Incident. | N/A | N/A | N/A | N/A |
| CIP-004-2 | R2.3. | The Responsible Entity shall maintain documentation that training is conducted at least annually, including the date the training was completed and attendance records. | N/A | N/A | The Responsible Entity did maintain documentation that training is conducted at least annually, but did not include attendance records. | The Responsible Entity did not maintain documentation that training is conducted at least annually, including the date the training was completed and attendance records. |
| CIP-004-2 | R3. | Personnel Risk Assessment —The Responsible Entity shall have a | N/A | The Responsible Entity has a | The Responsible Entity has a | The Responsible Entity does not have |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--|---|---|
| | | documented personnel risk assessment program, in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements, for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. A personnel risk assessment shall be conducted pursuant to that program prior to such personnel being granted such access except in specified circumstances such as an emergency. The personnel risk assessment program shall at a minimum include: | | personnel risk assessment program, in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements, as stated in R3 for personnel having authorized cyber or authorized unescorted physical access, but the program is not documented. | personnel risk assessment program as stated in R3, but conducted the personnel risk assessment pursuant to that program after such personnel were granted such access except in specified circumstances such as an emergency. | a documented personnel risk assessment program, in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements, as stated in R3, for personnel having authorized cyber or authorized unescorted physical access. OR The Responsible |
| | | | | | | Entity did not conduct the personnel risk assessment pursuant to that program for personnel granted such access except in specified circumstances such as an emergency. |
| CIP-004-2 | R3.1. | The Responsible Entity shall ensure that each assessment conducted include, at least, identity verification (e.g., Social Security Number | N/A | N/A | The Responsible Entity did not ensure that an assessment conducted included | The Responsible Entity did not ensure that each assessment |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | verification in the U.S.) and seven year criminal check. The Responsible Entity may conduct more detailed reviews, as permitted by law and subject to existing collective bargaining unit agreements, depending upon the criticality of the position. | | | an identity verification (e.g., Social Security Number verification in the U.S.) or a seven-year criminal check. | conducted include, at least, identity verification (e.g., Social Security Number verification in the U.S.) and seven-year criminal check. |
| CIP-004-2 | R3.2. | The Responsible Entity shall update each personnel risk assessment at least every seven years after the initial personnel risk assessment or for cause. | N/A | The Responsible Entity did not update each personnel risk assessment at least every seven years after the initial personnel risk assessment but did update it for cause when applicable. | The Responsible Entity did not update each personnel risk assessment for cause (when applicable) but did at least updated it every seven years after the initial personnel risk assessment. | The Responsible Entity did not update each personnel risk assessment at least every seven years after the initial personnel risk assessment nor was it updated for cause when applicable. |
| CIP-004-2 | R3.3. | The Responsible Entity shall document the results of personnel risk assessments of its personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets, and that personnel risk assessments of contractor and service vendor personnel with such access are conducted pursuant to Standard CIP- 004-2. | The Responsible Entity did not document the results of personnel risk assessments for at least one individual but less than 5% of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | The Responsible Entity did not document the results of personnel risk assessments for 5% or more but less than 10% of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | The Responsible Entity did not document the results of personnel risk assessments for 10% or more but less than 15% of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | The Responsible Entity did not document the results of personnel risk assessments for 15% or more of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-004-2 | R4. | Access — The Responsible Entity shall maintain list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets. | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets, missing at least one individual but less than 5% of the authorized personnel. | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets, missing 5% or more but less than 10% of the authorized personnel. | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets, missing 10% or more but less than 15% of the authorized personnel. | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets, missing 15% or more of the authorized personnel. |
| CIP-004-2 | R4.1. | The Responsible Entity shall review the list(s) of its personnel who have such access to Critical Cyber Assets quarterly, and update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, or any change in the access rights of such personnel. The Responsible Entity shall ensure access list(s) for contractors and service vendors are properly maintained. | N/A | The Responsible Entity did not review the list(s) of its personnel who have access to Critical Cyber Assets quarterly. | The Responsible Entity did not update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, nor any change in the access rights of such personnel. | The Responsible Entity did not review the list(s) of all personnel who have access to Critical Cyber Assets quarterly, nor update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, nor any change in the access rights of such personnel. |
| CIP-004-2 | R4.2. | The Responsible Entity shall revoke | N/A | The Responsible | The Responsible | The Responsible |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | such access to Critical Cyber Assets within 24 hours for personnel terminated for cause and within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. | | Entity did not revoke access within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. | Entity did not revoke access to Critical Cyber Assets within 24 hours for personnel terminated for cause. | Entity did not revoke access to Critical Cyber Assets within 24 hours for personnel terminated for cause nor within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. |
| CIP-005-2 | R1. | Electronic Security Perimeter — The Responsible Entity shall ensure that every Critical Cyber Asset resides within an Electronic Security Perimeter. The Responsible Entity shall identify and document the Electronic Security Perimeter(s) and all access points to the perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not ensure that every Critical Cyber Asset resides within an Electronic Security Perimeter. OR The Responsible Entity did not identify and document the Electronic Security Perimeter(s) and all access points to the perimeter(s). |
| CIP-005-2 | R1.1. | Access points to the Electronic Security Perimeter(s) shall include any externally connected communication end point (for example, dial-up modems) terminating at any device within the Electronic Security Perimeter(s). | N/A | N/A | N/A | Access points to the Electronic Security Perimeter(s) do not include all externally connected communication end point (for example, dial-up modems) terminating at any |

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| | | | | | | device within the Electronic Security Perimeter(s). |
| CIP-005-2 | R1.2. | For a dial-up accessible Critical Cyber Asset that uses a non-routable protocol, the Responsible Entity shall define an Electronic Security Perimeter for that single access point at the dial-up device. | N/A | N/A | N/A | For one or more dial-up accessible Critical Cyber Assets that use a non- routable protocol, the Responsible Entity did not define an Electronic Security Perimeter for that single access point at the dial-up device. |
| CIP-005-2 | R1.3. | Communication links connecting discrete Electronic Security Perimeters shall not be considered part of the Electronic Security Perimeter. However, end points of these communication links within the Electronic Security Perimeter(s) shall be considered access points to the Electronic Security Perimeter(s). | N/A | N/A | N/A | At least one end point of a communication link within the Electronic Security Perimeter(s) connecting discrete Electronic Security Perimeters was not considered an access point to the Electronic Security Perimeter. |
| CIP-005-2 | R1.4. | Any non-critical Cyber Asset within a defined Electronic Security Perimeter shall be identified and protected pursuant to the requirements of Standard CIP-005-2. | N/A | N/A | N/A | One or more noncritical Cyber Asset within a defined Electronic Security Perimeter is not identified. OR |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | Is not protected pursuant to the requirements of Standard CIP-005. |
| CIP-005-2 | R1.5. | Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall be afforded the protective measures as a specified in Standard CIP-003-2; Standard CIP-004-2 Requirement R3; Standard CIP-005-2 Requirements R2 and R3; Standard CIP-006-2 Requirement R3; Standard CIP-007-2 Requirements R1 and R3 through R9; Standard CIP-008-2; and Standard CIP-009-2. | N/AA Cyber Asset used in the access control and/or monitoring of the Electronic Security Perimeter(s) is provided with all but one (1) of the protective measures as specified in Standard CIP 003-2; Standard CIP 003-2; Standard CIP-005-2 Requirement R3; Standard CIP-005-2 Requirements R2 and R3; Standard CIP-006-2 Requirements R3, Standard CIP-007-2 Requirements R1 and R3 through R9;, Standard CIP-008-2; and Standard CIP- 009-2. | N/AA Cyber Asset used in the access control and/or monitoring of the Electronic Security Perimeter(s) is provided with all but two (2) of the protective measures as specified in Standard CIP 003-2; Standard CIP 003-2; Standard CIP-005-2 Requirements R2 and R3; Standard CIP-006-2 Requirements R3; Standard CIP-007-2 Requirements R1 and R3 through R9;; Standard CIP-008-2; and Standard CIP- 009-2. | N/AA Cyber Asset used in the access control and/or monitoring of the Electronic Security Perimeter(s) is provided with all but three (3) of the protective measures as specified in Standard CIP 003-2; Standard CIP 003-2; Standard CIP 004-2 Requirement R3; Standard CIP-005-2 Requirements R2 and R3; Standard CIP-006-2 Requirements R3; Standard CIP-007-2 Requirements R1 and R3 through R9; Standard CIP-008-2; and Standard CIP- 009-2. | A Cyber Asset used in the access control and/or monitoring of the Electronic Security Perimeter(s) <u>was not</u> is-not providedafforded without four (4) one (1) or more of the protective measures as specified in Standard CIP-003-2; Standard CIP-003-2; Standard CIP-004-2 Requirement R3; Standard CIP-005-2 Requirements R2 and R3; Standard CIP-006-2 Requirements R1 and R3 through R9; Standard CIP-008-2; and Standard CIP- 009-2. |
| CIP-005-2 | R1.6. | The Responsible Entity shall maintain documentation of Electronic Security Perimeter(s), all interconnected Critical and non-critical Cyber Assets within the Electronic Security Perimeter(s), all electronic access points to the Electronic Security | N/A | N/A | N/A | The Responsible Entity did not maintain documentation of one or more of the following: Electronic Security |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | Perimeter(s) and the Cyber Assets deployed for the access control and monitoring of these access points. | | | | Perimeter(s), interconnected Critical and noncritical Cyber Assets within the Electronic Security Perimeter(s), electronic access points to the Electronic Security Perimeter(s) and Cyber Assets deployed for the access control and monitoring of these access points. |
| CIP-005-2 | R2. | Electronic Access Controls — The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not implement or did not document the organizational processes and technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s). |
| CIP-005-2 | R2.1. | These processes and mechanisms shall use an access control model that denies access by default, such that explicit access permissions must be specified. | N/A | N/A | N/A | The processes and mechanisms did not use an access control model that denies access by |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | default, such that explicit access permissions must be specified. |
| CIP-005-2 | R2.2. | At all access points to the Electronic Security Perimeter(s), the Responsible Entity shall enable only ports and services required for operations and for monitoring Cyber Assets within the Electronic Security Perimeter, and shall document, individually or by specified grouping, the configuration of those ports and services. | N/A | N/A | N/A | At one or more access points to the Electronic Security Perimeter(s), the Responsible Entity enabled ports and services not required for operations and for monitoring Cyber Assets within the Electronic Security Perimeter, or did not document, individually or by specified grouping, the configuration of those ports and services. |
| CIP-005-2 | R2.3. | The Responsible Entity shall implement and maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s). | N/A | N/A | <u>N/AThe Responsible</u> Entity did implement but did not maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s) where applicable. | The Responsible Entity did not implement <u>ornor</u> maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s) where applicable. |
| CIP-005-2 | R2.4. | Where external interactive access into the Electronic Security Perimeter has been enabled, the | N/A | N/A | N/A | Where external interactive access into the Electronic |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | Responsible Entity shall implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible. | | | | Security Perimeter has been enabled the Responsible Entity did not implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible. |
| CIP-005-2 | R2.5. | The required documentation shall, at least, identify and describe: | N/A | N/A | N/A | The required documentation for R2 did not include one or more of the elements described in R2.5.1 through R2.5.4. |
| CIP-005-2 | R2.5.1. | The processes for access request and authorization. | N/A | N/A | N/A | N/A |
| CIP-005-2 | R2.5.2. | The authentication methods. | N/A | N/A | N/A | N/A |
| CIP-005-2 | R2.5.3. | The review process for authorization rights, in accordance with Standard CIP-004-2 Requirement R4. | N/A | N/A | N/A | N/A |
| CIP-005-2 | R2.5.4. | The controls used to secure dial-up accessible connections. | N/A | N/A | N/A | N/A |
| CIP-005-2 | R2.6. | Appropriate Use Banner — Where technically feasible, electronic access control devices shall display an appropriate use banner on the user screen upon all interactive access attempts. The Responsible Entity shall maintain a document | The Responsible Entity did not maintain a document identifying the content of the banner. | Where technically feasible 5% but less than 10% of electronic access control devices did not display an appropriate use banner on the user | Where technically feasible 10% but less than 15% of electronic access control devices did not display an appropriate use banner on the user | Where technically feasible, 15% or more electronic access control devices did not display an appropriate use banner on the user |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | identifying the content of the banner. | OR Where technically feasible less than 5% electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. | screen upon all interactive access attempts. | screen upon all interactive access attempts. | screen upon all interactive access attempts. |
| CIP-005-2 | R3. | Monitoring Electronic Access — The Responsible Entity shall implement and document an electronic or manual process(es) for monitoring and logging access at access points to the Electronic Security Perimeter(s) twenty-four hours a day, seven days a week. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document electronic or manual processes monitoring and logging access points. |
| CIP-005-2 | R3.1. | For dial-up accessible Critical Cyber Assets that use non-routable protocols, the Responsible Entity shall implement and document monitoring process(es) at each access point to the dial-up device, where technically feasible. | N/A | N/A | N/A | Where technically feasible, the Responsible Entity did not implement or did not document electronic or manual processes for monitoring at one or more access points to dial-up devices. |
| CIP-005-2 | R3.2. | Where technically feasible, the security monitoring process(es) shall detect and alert for attempts at or actual unauthorized accesses. These alerts shall provide for appropriate notification to designated response | N/A | N/A | N/A | Where technically feasible, the Responsible Entity did not implement security monitoring |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | personnel. Where alerting is not technically feasible, the Responsible Entity shall review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. | | | | process(es) to detect and alert for attempts at or actual unauthorized accesses. OR The above alerts do not provide for appropriate notification to designated response personnel. OR Where alerting is not technically feasible, the Responsible Entity did not review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. |
| CIP-005-2 | R4. | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of the electronic access points to the Electronic Security Perimeter(s) at least annually. The vulnerability assessment shall include, at a minimum, the following: | N/A | N/A | N/A | The Responsible Entity did not perform a Vulnerability Assessment at least annually for one or more of the access points to the Electronic Security Perimeter(s). |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | OR The vulnerability assessment did not include one (1) or more of the subrequirements R4.1, R4.2, R4.3, R4.4, R4.5. |
| CIP-005-2 | R4.1. | A document identifying the vulnerability assessment process; | N/A | N/A | N/A | N/A |
| CIP-005-2 | R4.2. | A review to verify that only ports and services required for operations at these access points are enabled; | N/A | N/A | N/A | N/A |
| CIP-005-2 | R4.3. | The discovery of all access points to the Electronic Security Perimeter; | N/A | N/A | N/A | N/A |
| CIP-005-2 | R4.4. | A review of controls for default accounts, passwords, and network management community strings; | N/A | N/A | N/A | N/A |
| CIP-005-2 | R4.5. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | N/A | N/A | N/A | N/A |
| CIP-005-2 | R5. | Documentation Review and Maintenance — The Responsible Entity shall review, update, and maintain all documentation to support compliance with the requirements of Standard CIP-005-2. | The Responsible Entity did not review, update, and maintain at least one but less than or equal to 5% of the documentation to support compliance with the requirements of Standard CIP-005. | The Responsible Entity did not review, update, and maintain greater than 5% but less than or equal to 10% of the documentation to support compliance with the requirements of Standard CIP-005. | The Responsible Entity did not review, update, and maintain greater than 10% but less than or equal to 15% of the documentation to support compliance with the requirements of Standard CIP-005. | The Responsible Entity did not review, update, and maintain greater than 15% of the documentation to support compliance with the requirements of Standard CIP-005. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-005-2 | R5.1. | The Responsible Entity shall ensure that all documentation required by Standard CIP- 005-2 reflect current configurations and processes and shall review the documents and procedures referenced in Standard CIP-005-2 at least annually. | N/A | The Responsible Entity did not provide evidence of an annual review of the documents and procedures referenced in Standard CIP-005. | The Responsible Entity did not document current configurations and processes referenced in Standard CIP-005. | The Responsible Entity did not document current configurations and processes and did not review the documents and procedures referenced in Standard CIP-005 at least annually. |
| CIP-005-2 | R5.2. | The Responsible Entity shall update the documentation to reflect the modification of the network or controls within ninety calendar days of the change. | N/A | N/A | N/A | The Responsible Entity did not update documentation to reflect a modification of the network or controls within ninety calendar days of the change. |
| CIP-005-2 | R5.3. | The Responsible Entity shall retain electronic access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-2. | The Responsible Entity retained electronic access logs for 75 or more calendar days, but for less than 90 calendar days. | The Responsible Entity retained electronic access logs for 60 or more calendar days, but for less than 75 calendar days. | The Responsible Entity retained electronic access logs for 45 or more calendar days , but for less than 60 calendar days. | The Responsible Entity retained electronic access logs for less than 45 calendar days. |
| CIP-006-2 | R1. | Physical Security Plan — The Responsible Entity shall document, implement, and maintain a physical security plan, approved by the senior manager or delegate(s) that shall address, at a minimum, the following: | N/A | N/A | The Responsible Entity created a physical security plan but did not gain approval by a senior manager or delegate(s). | The Responsible Entity did not document, implement, and maintain a physical security plan. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | OR The Responsible Entity created and implemented but did not maintain a physical security plan. | |
| CIP-006-2 | R1.1. | All Cyber Assets within an Electronic Security Perimeter shall reside within an identified Physical Security Perimeter. Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity shall deploy and document alternative measures to control physical access to such Cyber Assets. | N/A | <u>N/A</u> Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity has deployed but not documented alternative measures to control physical access to such Cyber Assets within the Electronic Security Perimeter. | Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity has not deployed alternative measures to control physical access to such Cyber Assets within the Electronic Security Perimeter.N/A | The Responsible Entity's physical security plan does not include processes to ensure and document that all Cyber Assets within an Electronic Security Perimeter also reside within an identified Physical Security Perimeter. OR |
| | | | | | | Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity has not deployed orand documented alternative measures to control physical-access to such Cyber Assets within the Electronic |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | Security Perimeter. |
| CIP-006-2 | R1.2. | Identification of all physical access points through each Physical Security Perimeter and measures to control entry at those access points. | N/A | <u>N/A</u> The Responsible Entity's physical security plan includes measures to control entry at access points but does not identify all access points through each Physical Security Perimeter. | <u>N/A</u> The Responsible Entity's physical security identifies all access points through each Physical Security Perimeter but does not identify measures to control entry at those access points. | The Responsible Entity's physical security plan does not identify all access points through each Physical Security Perimeter nor does not identify measures to control entry at those access points. |
| CIP-006-2 | R1.3 | Processes, tools, and procedures to monitor physical access to the perimeter(s). | N/A | N/A | N/A | The Responsible Entity's physical security plan does not include processes, tools, and procedures to monitor physical access to the perimeter(s). |
| CIP-006-2 | R1.4 | Appropriate use of physical access controls as described in Requirement R4 including visitor pass management, response to loss, and prohibition of inappropriate use of physical access controls. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not address the appropriate use of physical access controls as described in Requirement R4. |
| CIP-006-2 | R1.5 | Review of access authorization requests and revocation of access authorization, in accordance with CIP-004-2 Requirement R4. | N/A | N/A | <u>N/A</u> The Responsible Entity's physical security plan does not address either | The Responsible Entity's physical security plan does not address the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | the process for reviewing access authorization requests or the process for revocation of access authorization, in accordance with CIP 004 2 Requirement R4. | process for reviewing of access authorization requests andor the process for revocation of access authorization, in accordance with CIP-004-2 Requirement R4. |
| CIP-006-2 | R1.6 | Continuous escorted access within the Physical Security Perimeter of personnel not authorized for unescorted access. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not address the process for continuous escorted access within the physical security perimeter. |
| CIP-006-2 | R1.7 | Update of the physical security plan within thirty calendar days of the completion of any physical security system redesign or reconfiguration, including, but not limited to, addition or removal of access points through the Physical Security Perimeter, physical access controls, monitoring controls, or logging controls. | N/A | N/A | <u>N/A</u> The Responsible Entity's physical security plan addresses a process for updating the physical security plan within thirty calendar days of the completion of any physical security system redesign or reconfiguration but the plan was not updated within thirty calendar days of the completion of a physical security | The Responsible Entity's physical security plan does not address a process for updating the physical security plan within-thirty calendar days of the completion of a physical security system redesign or within thirty calendar days of the completion of a reconfiguration. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | system redesign or reconfiguration. | OR The plan was not updated within thirty calendar days of the completion of a physical security system redesign or reconfiguration. |
| CIP-006-2 | R1.8 | Annual review of the physical security plan. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not address a process for ensuring that the physical security plan is reviewed at least annually. |
| CIP-006-2 | R2 | Protection of Physical Access Control Systems — Cyber Assets that authorize and/or log access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers, shall: | <u>N/A</u> A Cyber Asset that authorizes and/or logs access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers was provided with all but one (1) of the | <u>N/A</u> A Cyber Asset that authorizes and/or logs access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers was provided with all but two (2) of the | <u>N/A</u> A Cyber Asset that authorizes and/or logs access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers was provided with all but three (3) of | A Cyber Asset that authorizes and/or logs access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers, was not protected from unauthorized physical access. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | protective measures specified in Standard CIP-003-2; Standard CIP-004-2 Requirement R3; Standard CIP-005-2 Requirements R2 and R3; Standard CIP-006-2 Requirements R4 and R5; Standard CIP-008-2; and Standard CIP-009-2. | protective measures specified in Standard CIP-003-2; Standard CIP-004-2 Requirement R3; Standard CIP-005-2 Requirements R2 and R3; Standard CIP-006-2 Requirements R4 and R5; Standard CIP-007-2; Standard CIP-008-2; and Standard CIP-009-2. | the protective measures specified in Standard CIP-003- 2; Standard CIP-004- 2 Requirement R3; Standard CIP-005-2 Requirements R2 and R3; Standard CIP-006-2 Requirements R4 and R5; Standard CIP-007-2; Standard CIP-008-2; and Standard CIP-009-2. | OR A Cyber Asset that authorizes and/or logs access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers was provided without-not afforded four (4) or more of the protective measures specified in Standard CIP-003-2; Standard CIP-004-2 Requirement R3; Standard CIP-005-2 Requirements R2 and R3; Standard CIP-006-2 Requirements R4 and R5; Standard CIP-007-2; Standard CIP-008-2; and Standard CIP-009-2. |
| CIP-006-2 | R2.1. | Be protected from unauthorized physical access. | N/A | N/A | N/A | N/A |

| | Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| C | CIP-006-2 | R2.2. | Be afforded the protective measures specified in Standard CIP-003-2; Standard CIP-004-2 Requirement R3; Standard CIP-005-2 Requirements R2 and R3; Standard CIP-006-2 Requirements R4 and R5; Standard CIP-007-2; Standard CIP-008-2; and Standard CIP-009-2. | N/A | N/A | N/A | N/A |
| | CIP-006-2 | R3 | Protection of Electronic Access Control Systems — Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall reside within an identified Physical Security Perimeter. | N/A | N/A | N/A | A Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) <u>doesdid</u> not reside within an identified Physical Security Perimeter. |
| C | CIP-006-2 | R4 | Physical Access Controls — The Responsible Entity shall document and implement the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. The Responsible Entity shall implement one or more of the following physical access methods: Card Key: A means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from one perimeter to another. | N/A | N/AThe Responsible Entity has implemented but not documented the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty- four hours a day, seven days a week using one or more of the following physical access methods: - Card Key: A | N/AThe Responsible Entity has documented but not implemented the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty- four hours a day, seven days a week using one or more of the following physical access methods: - Card Key: A | The Responsible Entity has not documented nor has not implemented the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty- four hours a day, seven days a week using one or more of the following physical access methods: • Card Key: A |

| Standard Requirement Number Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | Special Locks: These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. Security Personnel: Personnel responsible for controlling physical access who may reside on-site or at a monitoring station. Other Authentication Devices: Biometric, keypad, token, or other equivalent devices that control physical access to the Critical Cyber Assets | | means of electronicaccess where theaccess rights of thecard holder arepredefined in acomputer database.Access rights maydiffer from oneperimeter toanother.• Special Locks:These include, butare not limited to,locks with"restricted key"systems, magneticlocks that can beoperated remotely,and "man trap"systems.• SecurityPersonnel:Personnelresponsible forcontrolling physicalaccess who mayreside on site or at amonitoring station.• OtherAuthenticationDevices: Biometric,keypad, token, orother equivalentdevices that controlphysical access tothe Critical CyberAssets. | means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from one perimeter to another. Special Locks: These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man trap" systems. Security Personnel: Personnel: reside on site or at a monitoring stationOther Authentication Devices: Biometric, keypad, token, or other equivalent devices that control physical access to the critical Cyber Assets. | means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from one perimeter to another. • Special Locks: These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. • Security Personnel: Personnel responsible for controlling physical access who may reside on-site or at a monitoring station. • Other Authentication Devices: Biometric, keypad, token, or other equivalent devices that control physical access to the Critical Cyber Assets. |

| Standard Requirement Number Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-006-2 R5 | Monitoring Physical Access — The Responsible Entity shall document and implement the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. Unauthorized access attempts shall be reviewed immediately and handled in accordance with the procedures specified in Requirement CIP-008-2. One or more of the following monitoring methods shall be used: Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel responsible for response. Human Observation of Access Points: Monitoring of physical access points by authorized personnel as specified in Requirement R4. | N/A | N/AThe ResponsibleEntity hasimplemented butnot documented thetechnical andprocedural controlsfor monitoringphysical access at allaccess points to thePhysical SecurityPerimeter(s) twenty-four hours a day,seven days a weekusing one or more ofthe followingmonitoringmethods:• Alarm Systems:Systems that alarmto indicate a door,gate or window hasbeen openedwithoutauthorization.These alarms mustprovide forimmediatenotification topersonnelresponse.HumanObservation ofAccess Points:Monitoring ofphysical accesspoints by authorized | N/AThe Responsible Entity has documented but not implemented the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) twenty- four hours a day, seven days a week using one or more of the following monitoring methods: - Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel response. - Human Observation of Access Points: Monitoring of physical access points by authorized | The Responsible Entity has not documented nor has not implemented the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) twenty- four hours a day, seven days a week using one or more of the following monitoring methods: • Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel responsible for response. • Human Observation of Access Points: Monitoring of physical access |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | personnel as specified in Requirement R4. | personnel as specified in Requirement R4. | points by authorized personnel as specified in Requirement R4. OR An unauthorized access attempt was not reviewed immediately and handled in accordance with CIP-008-2. |
| CIP-006-2 | R6 | Logging Physical Access — Logging shall record sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. The Responsible Entity shall implement and document the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method. Video Recording: Electronic capture of video images of sufficient quality to determine identity. Manual Logging: A log book | N/AThe Responsible Entity has implemented but not documented the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method, | N/AThe Responsible Entity has implemented the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: • Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method, • Video Recording: | N/AThe Responsible Entity has documented but not implemented the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: • Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method, | The Responsible Entity has not implemented nor has not documented the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: • Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4 | Video Recording: Electronic capture of video images of sufficient quality to determine identity, or Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4, and has provided logging that records sufficient information to uniquely identify individuals and the time of access twenty four hours a day, seven days a week. | Electronic capture of video images of sufficient quality to determine identity, or • Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4, but has not provided logging that records sufficient information to uniquely identify individuals and the time of access twenty four hours a day, seven days a week. | Video Recording: Electronic capture of video images of sufficient quality to determine identity, or Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4. | monitoring method, • Video Recording: Electronic capture of video images of sufficient quality to determine identity, or • Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4. OR The Responsible Entity has not recorded sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. |
| CIP-006-2 | R7 | Access Log Retention — The responsible entity shall retain physical access logs for at least ninety calendar days. Logs related to | <u>N/A</u> The Responsible Entity retained physical access logs for 75 or more | <u>N/A</u> The Responsible Entity retained physical access logs for 60 or more | <u>N/A</u> The Responsible Entity retained physical access logs for 45 or more | The Responsible Entity retained physical access logs for less than 45 |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-2. | calendar days, but f or less than 90 calendar days. | calendar days, but for less than 75 calendar days. | calendar days, but f or less than 60 calendar days. | calendar days. Theresponsible entitydid not retainphysical access logsfor at least ninetycalendar days. |
| CIP-006-2 | R8 | Maintenance and Testing — The Responsible Entity shall implement a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly. The program must include, at a minimum, the following: | <u>N/A</u> The Responsible Entity has implemented a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly but the program does not include one of the Requirements R8.1, R8.2, and R8.3. | <u>N/A</u> The Responsible Entity has implemented a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly but the program does not include two of the Requirements R8.1, R8.2, and R8.3. | <u>N/A</u> The Responsible Entity has implemented a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly but the program does not include any of the Requirements R8.1, R8.2, and R8.3. | The Responsible Entity has not implemented a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly. OR The implemented program does not include one or more of the requirements; R8.1, R8.2, and R8.3. |
| CIP-006-2 | R8.1 | Testing and maintenance of all physical security mechanisms on a cycle no longer than three years. | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> |
| CIP-006-2 | R8.2 | Retention of testing and maintenance records for the cycle determined by the Responsible Entity in Requirement R8.1. | <u>N/A</u> | N/A | <u>N/A</u> | N/A |
| CIP-006-2 | R8.3 | Retention of outage records regarding access controls, logging, and monitoring for a minimum of | <u>N/A</u> | N/A | <u>N/A</u> | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | one calendar year. | | | | |
| CIP-007-2 | R1. | Test Procedures — The Responsible Entity shall ensure that new Cyber Assets and significant changes to existing Cyber Assets within the Electronic Security Perimeter do not adversely affect existing cyber security controls. For purposes of Standard CIP-007-2, a significant change shall, at a minimum, include implementation of security patches, cumulative service packs, vendor releases, and version upgrades of operating systems, applications, database platforms, or other third- party software or firmware. | N/A | N/A | N/A | The Responsible Entity did not ensure the prevention of adverse affects described in R1, by not including the required minimum significant changes. OR The Responsible Entity did not address one or more of the following: R1.1, R1.2, R1.3. |
| CIP-007-2 | R1.1. | The Responsible Entity shall create, implement, and maintain cyber security test procedures in a manner that minimizes adverse effects on the production system or its operation. | N/A | N/A | N/A | N/A |
| CIP-007-2 | R1.2. | The Responsible Entity shall document that testing is performed in a manner that reflects the production environment. | N/A | N/A | N/A | N/A |
| CIP-007-2 | R1.3. | The Responsible Entity shall document test results. | N/A | N/A | N/A | N/A |
| CIP-007-2 | R2. | Ports and Services — The Responsible Entity shall establish, document and implement a process to ensure that only those ports and services required for normal and emergency operations are enabled. | N/A | <u>N/A</u> The Responsible Entity established (implemented) but did not document a process to ensure that only those ports and services | <u>N/A</u> The Responsible Entity documented but did not establish (implement) a process to ensure that only those ports | The Responsible Entity did not establish (implement) n or <u>did</u> <u>not</u> document a process to ensure that only those ports |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | required for normal and emergency operations are enabled. | and services required for normal and emergency operations are enabled. | and services required for normal and emergency operations are enabled. |
| CIP-007-2 | R2.1. | The Responsible Entity shall enable only those ports and services required for normal and emergency operations. | N/A | N/A | N/A | The Responsible Entity enabled one or more ports or services not required for normal and emergency operations on Cyber Assets inside the Electronic Security Perimeter(s). |
| CIP-007-2 | R2.2. | The Responsible Entity shall disable other ports and services, including those used for testing purposes, prior to production use of all Cyber Assets inside the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not disable one or more other ports or services, including those used for testing purposes, prior to production use for Cyber Assets inside the Electronic Security Perimeter(s). |
| CIP-007-2 | R2.3. | In the case where unused ports and services cannot be disabled due to technical limitations, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | N/A | N/A | N/A | For cases where unused ports and services cannot be disabled due to technical limitations, the Responsible Entity did not document compensating |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | measure(s) applied to mitigate risk <u>.</u> exposure or state an acceptance of risk. |
| CIP-007-2 | R3. | Security Patch Management — The Responsible Entity, either separately or as a component of the documented configuration management process specified in CIP-003-2 Requirement R6, shall establish, document and implement a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | N/AThe Responsible Entity established (implemented) and documented, either separately or as a component of the documented configuration management process specified in CIP 003-2 Requirement R6, a security patch management program but did not include one or more of the following: tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | N/AThe Responsible Entity established (implemented) but did not document, either separately or as a component of the documented configuration management process specified in CIP 003-2 Requirement R6, a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | N/AThe Responsible Entity documented but-did not establish (implement), either separately or as a component of the documented configuration management process specified in CIP-003-2 Requirement R6, a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | The Responsible Entity did not establish (implement) nor did not document, either separately or as a component of the documented configuration management process specified in CIP-003-2 Requirement R6, a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). |
| CIP-007-2 | R3.1. | The Responsible Entity shall document the assessment of security patches and security upgrades for applicability within thirty calendar days of availability of the patches or upgrades. | N/A | N/A | N/A | The Responsible Entity did not document the assessment of security patches and security upgrades |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | for applicability as required in Requirement R3 within 30 calendar days after the availability of the patches and upgrades. |
| CIP-007-2 | R3.2. | The Responsible Entity shall document the implementation of security patches. In any case where the patch is not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | N/A | N/A | N/A | The Responsible Entity did not document the implementation of applicable security patches as required in R3. OR Where an applicable patch was not installed, the Responsible Entity did not document the compensating measure(s) applied to mitigate risk. exposure or an acceptance of risk. |
| CIP-007-2 | R4. | Malicious Software Prevention — The Responsible Entity shall use anti- virus software and other malicious software ("malware") prevention tools, where technically feasible, to detect, prevent, deter, and mitigate the introduction, exposure, and propagation of malware on all Cyber Assets within the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity, where technically feasible, did not use anti- virus software or other malicious software ("malware") prevention tools, on <u>one</u> or more Cyber |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | Assets within the Electronic Security Perimeter(s). |
| CIP-007-2 | R4.1. | The Responsible Entity shall document and implement anti-virus and malware prevention tools. In the case where anti-virus software and malware prevention tools are not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | N/A | N/A | N/A | The Responsible Entity did not document the implementation of antivirus and malware prevention tools for cyber assets within the electronic security perimeter. OR The Responsible Entity did not document the implementation of compensating measure(s) applied to mitigate risk exposure where antivirus and malware prevention tools are not installed. |
| CIP-007-2 | R4.2. | The Responsible Entity shall document and implement a process for the update of anti-virus and malware prevention "signatures." The process must address testing and installing the signatures. | N/A | N/A | N/A | The Responsible Entity did not document or did not implement a process including addressing testing and installing the signatures for the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | update of anti-virus and malware prevention "signatures." |
| CIP-007-2 | R5. | Account Management — The Responsible Entity shall establish, implement, and document technical and procedural controls that enforce access authentication of, and accountability for, all user activity, and that minimize the risk of unauthorized system access. | N/A | N/A | N/A | The Responsible Entity did not document or did not implement technical and procedural controls that enforce access authentication of, and accountability for, all user activity. |
| CIP-007-2 | R5.1. | The Responsible Entity shall ensure that individual and shared system accounts and authorized access permissions are consistent with the concept of "need to know" with respect to work functions performed. | N/A | N/A | N/A | The Responsible Entity did not ensure that individual and shared system accounts and authorized access permissions are consistent with the concept of "need to know" with respect to work functions performed. |
| CIP-007-2 | R5.1.1. | The Responsible Entity shall ensure that user accounts are implemented as approved by designated personnel. Refer to Standard CIP-003-2 Requirement R5. | N/A | N/A | N/A | One or more user accounts implemented by the Responsible Entity were not implemented as approved by designated personnel. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-007-2 | R5.1.2. | The Responsible Entity shall establish methods, processes, and procedures that generate logs of sufficient detail to create historical audit trails of individual user account access activity for a minimum of ninety days. | N/A | The Responsible Entity generated logs with sufficient detail to create historical audit trails of individual user account access activity, however the logs do not contain activity for a minimum of 90 days. | The Responsible Entity generated logs with insufficient detail to create historical audit trails of individual user account access activity. | The Responsible Entity did not generate logs of individual user account access activity. |
| CIP-007-2 | R5.1.3. | The Responsible Entity shall review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003-2 Requirement R5 and Standard CIP- 004-2 Requirement R4. | N/A | N/A | N/A | The Responsible Entity did not review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003-2 Requirement R5 and Standard CIP-004-2 Requirement R4. |
| CIP-007-2 | R5.2. | The Responsible Entity shall implement a policy to minimize and manage the scope and acceptable use of administrator, shared, and other generic account privileges including factory default accounts. | N/A | N/A | N/A | The Responsible Entity did not implement a policy to minimize and manage the scope and acceptable use of administrator, shared, and other generic account privileges including factory default accounts. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-007-2 | R5.2.1. | The policy shall include the removal, disabling, or renaming of such accounts where possible. For such accounts that must remain enabled, passwords shall be changed prior to putting any system into service. | N/A | N/A | The Responsible Entity's policy did not include the removal, disabling, or renaming of such accounts where possible, however for accounts that must remain enabled, passwords were changed prior to putting any system into service. | For accounts that must remain enabled, the Responsible Entity did not change passwords prior to putting any system into service. |
| CIP-007-2 | R5.2.2. | The Responsible Entity shall identify those individuals with access to shared accounts. | N/A | N/A | N/A | The Responsible Entity did not identify all individuals with access to shared accounts. |
| CIP-007-2 | R5.2.3. | Where such accounts must be shared, the Responsible Entity shall have a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps for securing the account in the event of personnel changes (for example, change in assignment or termination). | N/A | N/A | N/A | Where such accounts must be shared, the Responsible Entity has not implemented (one or more components of) a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | for securing the account in the event of personnel changes (for example, change in assignment or termination). |
| CIP-007-2 | R5.3. | At a minimum, the Responsible Entity shall require and use passwords, subject to the following, as technically feasible: | N/A | N/A | N/A | The Responsible Entity does not require passwords subject to R5.3.1, R5.3.2, R5.3.3. OR Does not use passwords subject to R5.3.1, R5.3.2, R5.3.3. |
| CIP-007-2 | R5.3.1. | Each password shall be a minimum of six characters. | N/A | N/A | N/A | N/A |
| CIP-007-2 | R5.3.2. | Each password shall consist of a combination of alpha, numeric, and "special" characters. | N/A | N/A | N/A | N/A |
| CIP-007-2 | R5.3.3. | Each password shall be changed at least annually, or more frequently based on risk. | N/A | N/A | N/A | N/A |
| CIP-007-2 | R6. | Security Status Monitoring — The Responsible Entity shall ensure that all Cyber Assets within the Electronic Security Perimeter, as technically feasible, implement automated tools or organizational process controls to monitor system events that are related to cyber security. | N/A | N/A | N/A | The Responsible Entity as technically feasible, did not implement automated tools or organizational process controls, to monitor system events that are related to cyber |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | security on one or more of Cyber Assets inside the Electronic Security Perimeter(s). |
| CIP-007-2 | R6.1. | The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter. |
| CIP-007-2 | R6.2. | The security monitoring controls shall issue automated or manual alerts for detected Cyber Security Incidents. | N/A | N/A | N/A | The Responsible entity's security monitoring controls do not issue automated or manual alerts for detected Cyber Security Incidents. |
| CIP-007-2 | R6.3. | The Responsible Entity shall maintain logs of system events related to cyber security, where technically feasible, to support incident response as required in Standard CIP-008-2. | N/A | N/A | N/A | The Responsible Entity did not maintain logs of system events related to cyber security, where technically feasible, to support incident response as |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | required in Standard CIP-008. |
| CIP-007-2 | R6.4. | The Responsible Entity shall retain all logs specified in Requirement R6 for ninety calendar days. | N/A | N/A | N/A | The Responsible Entity did not retain one or more of the logs specified in Requirement R6 for at least 90 calendar days. |
| CIP-007-2 | R6.5. | The Responsible Entity shall review logs of system events related to cyber security and maintain records documenting review of logs. | N/A | N/A | N/A | The Responsible Entity did not review logs of system events related to cyber security nor maintain records documenting review of logs. |
| CIP-007-2 | R7. | Disposal or Redeployment — The Responsible Entity shall establish and implement formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-2. | <u>N/A</u> The Responsible Entity established and implemented formal methods, processes, and procedures for disposal and redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP 005-2 but did not maintain records as specified in R7.3. | <u>N/A</u> The Responsible Entity established and implemented formal methods, processes, and procedures for disposal of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-2 but did not address redeployment as specified in R7.2. | The Responsible Entity established and implemented formal methods, processes, and procedures for redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-2 but did not address disposal redeployment as specified in R7.21. | The Responsible Entity did not establish or implement formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-2. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | The Responsible Entity established formal methods, processes, and procedures for redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-2 but did not address disposal as specified in R7.1. |
| | | Driver to the disposal of such assets | | | | <u>OR</u> <u>The Responsible</u> <u>Entity did not</u> <u>maintain records</u> <u>pertaining to</u> <u>disposal or</u> <u>redeployment as</u> <u>specified in R7.3.[³]</u> |
| CIP-007-2 | R7.1. | Prior to the disposal of such assets, the Responsible Entity shall destroy or erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | N/A | N/A | N/A | N/A |

³ Please note that FERC's January 20, 2011 Order on Version 2 And Version 3 Violation Risk Factors And Violation Severity Levels For Critical Infrastructure Protection Reliability Standards dictated that this should read "…records pertaining to disposal **of** redeployment as specified in R7.3." (Emphasis added) It has come to NERC's attention that it should read "…records pertaining to disposal **or** redeployment as specified in R7.3." (emphasis added) and NERC has made this change accordingly. NERC proposes to remove this footnote from the final approved list of VSLs.

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|----------|--|
| CIP-007-2 | R7.2. | Prior to redeployment of such assets, the Responsible Entity shall, at a minimum, erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | N/A | N/A | N/A | N/A |
| CIP-007-2 | R7.3. | The Responsible Entity shall maintain records that such assets were disposed of or redeployed in accordance with documented procedures. | N/A | N/A | N/A | N/A |
| CIP-007-2 | R8 | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of all Cyber Assets within the Electronic Security Perimeter at least annually. The vulnerability assessment shall include, at a minimum, the following: | N/A | N/A | N/A | The Responsible Entity did not perform a Vulnerability Assessment on one or more Cyber Assets within the Electronic Security Perimeter at least annually. OR The vulnerability assessment did not include one (1) or more of the subrequirements 8.1, 8.2, 8.3, 8.4. |
| CIP-007-2 | R8.1. | A document identifying the vulnerability assessment process; | N/A | N/A | N/A | N/A |
| CIP-007-2 | R8.2. | A review to verify that only ports and services required for operation of the Cyber Assets within the Electronic Security Perimeter are enabled; | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--|--|---|
| CIP-007-2 | R8.3. | A review of controls for default accounts; and, | N/A | N/A | N/A | N/A |
| CIP-007-2 | R8.4. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | N/A | N/A | N/A | N/A |
| CIP-007-2 | R9 | Documentation Review and Maintenance — The Responsible Entity shall review and update the documentation specified in Standard CIP-007-2 at least annually. Changes resulting from modifications to the systems or controls shall be documented within thirty calendar days of the change being completed. | N/A | N/A | The Responsible Entity did not review and update the documentation specified in Standard CIP-007-2 at least annually. OR The Responsible Entity did not document changes resulting from modifications to the systems or controls within thirty calendar days of the change being completed. | The Responsible Entity did not review and update the documentation specified in Standard CIP-007-2 at least annually nor-and were changes resulting from modifications to the systems or controls were not documented within thirty calendar days of the change being completed. |
| CIP-008-2 | R1. | Cyber Security Incident Response Plan — The Responsible Entity shall develop and maintain a Cyber Security Incident response plan and implement the plan in response to Cyber Security Incidents. The Cyber Security Incident response plan shall address, at a minimum, the | N/A | <u>N/A</u> The Responsible Entity has developed but not maintained a Cyber Security Incident response plan. | The Responsible Entity has developed a Cyber Security Incident response plan <u>that addresses</u> <u>all of the</u> <u>components</u> <u>required by R1.1</u> | The Responsible Entity has not developed a Cyber Security Incident response plan <u>that</u> addresses all of the <u>components</u> <u>required by R1.1</u> |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|--|---|
| | | following: | | | through R1.6 but has not maintained the plan in accordance with those components. but the plan does not address one or | through R1.6, or has not implemented the plan in response to a Cyber Security Incident. |
| CIP-008-2 | R1.1. | Procedures to characterize and classify events as reportable Cyber Security Incidents. | N/A | N/A | N/A | N/A |
| CIP-008-2 | R1.2. | Response actions, including roles and responsibilities of Cyber Security Incident response teams, Cyber Security Incident handling procedures, and communication plans. | N/A | N/A | N/A | N/A |
| CIP-008-2 | R1.3. | Process for reporting Cyber Security Incidents to the Electricity Sector Information Sharing and Analysis Center (ES-ISAC). The Responsible Entity must ensure that all reportable Cyber Security Incidents are reported to the ES-ISAC either directly or through an intermediary. | N/A | N/A | N/A | N/A |
| CIP-008-2 | R1.4. | Process for updating the Cyber Security Incident response plan within thirty calendar days of any changes. | N/A | N/A | N/A | N/A |
| CIP-008-2 | R1.5. | Process for ensuring that the Cyber Security Incident response plan is reviewed at least annually. | N/A | N/A | N/A | N/A |
| CIP-008-2 | R1.6. | Process for ensuring the Cyber Security Incident response plan is | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|----------|---|
| | | tested at least annually. A test of the Cyber Security Incident response plan can range from a paper drill, to a full operational exercise, to the response to an actual incident. Testing the Cyber Security Incident response plan does not require removing a component or system from service during the test. | | | | |
| CIP-008-2 | R2 | Cyber Security Incident Documentation — The Responsible Entity shall keep relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 for three calendar years. | N/A | N/A | N/A | The Responsible Entity has not kept relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 for at least three calendar years. |
| CIP-009-2 | R1 | Recovery Plans — The Responsible Entity shall create and annually review recovery plan(s) for Critical Cyber Assets. The recovery plan(s) shall address at a minimum the following: | N/A | N/A | N/A | The Responsible Entity has not created or has not annually reviewed their recovery plan(s) for Critical Cyber Assets OR has created a plan but did not address one or more of the requirements CIP- 009-1 R1.1 and R1.2. |
| CIP-009-2 | R1.1. | Specify the required actions in response to events or conditions of varying duration and severity that would activate the recovery plan(s). | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|---|--|--|---|
| CIP-009-2 | R1.2. | Define the roles and responsibilities of responders. | N/A | N/A | N/A | N/A |
| CIP-009-2 | R2 | Exercises — The recovery plan(s) shall be exercised at least annually. An exercise of the recovery plan(s) can range from a paper drill, to a full operational exercise, to recovery from an actual incident. | N/A | N/A | N/A | The Responsible Entity's recovery plan(s) have not been exercised at least annually. |
| CIP-009-2 | R3 | Change Control — Recovery plan(s) shall be updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. Updates shall be communicated to personnel responsible for the activation and implementation of the recovery plan(s) within thirty calendar days of the change being completed. | <u>N/A</u> The Responsible Entity's recovery plan(s) have been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident but the updates were communicated to personnel responsible for the activation and implementation of the recovery plan(s) in more than30 but less than or equal to 120 calendar days of the change. | <u>N/A</u> The Responsible Entity's recovery plan(s) have been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident but the updates were communicated to personnel responsible for the activation and implementation of the recovery plan(s) in more than 120 but less than or equal to 150 calendar days of the change. | <u>N/A</u> The Responsible Entity's recovery plan(s) have been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident but the updates were communicated to personnel responsible for the activation and implementation of the recovery plan(s) in more than 150 but less than or equal to 180 calendar days of the change. | The Responsible Entity's recovery plan(s) have not been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. OR The Responsible Entity's recovery plan(s) have been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident but the updates were <u>not</u> communicated to personnel responsible for the activation and |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|----------|---|
| | | | | | | implementation of the recovery plan(s) <u>with</u> in more than <u>thirty 180</u> calendar days of the change. |
| CIP-009-2 | R4 | Backup and Restore — The recovery plan(s) shall include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. For example, backups may include spare electronic components or equipment, written documentation of configuration settings, tape backup, etc. | N/A | N/A | N/A | The Responsible Entity's recovery plan(s) do not include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. |
| CIP-009-2 | R5 | Testing Backup Media — Information essential to recovery that is stored on backup media shall be tested at least annually to ensure that the information is available. Testing can be completed off site. | N/A | N/A | N/A | The Responsible Entity's information essential to recovery that is stored on backup media has not been tested at least annually to ensure that the information is available. |

VRFs

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| CIP-002-2 | R1. | Critical Asset Identification Method — The Responsible Entity shall identify and document a risk-based assessment methodology to use to identify its Critical Assets. | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-002-2 | R1.1 | The Responsible Entity shall maintain documentation describing its risk-based assessment methodology that includes procedures and evaluation criteria. | LOWER |
| CIP-002-2 | R1.2 | The risk-based assessment shall consider the following assets: | MEDIUM |
| CIP-002-2 | R1.2.1. | Control centers and backup control centers performing the functions of the entities listed in the Applicability section of this standard. | LOWER |
| CIP-002-2 | R1.2.2. | Transmission substations that support the reliable operation of the Bulk Electric System. | LOWER |
| CIP-002-2 | R1.2.3. | Generation resources that support the reliable operation of the Bulk Electric System. | LOWER |
| CIP-002-2 | R1.2.4. | Systems and facilities critical to system restoration, including blackstart generators and substations in the electrical path of transmission lines used for initial system restoration. | LOWER |
| CIP-002-2 | R1.2.5. | Systems and facilities critical to automatic load shedding under a common control system capable of shedding 300 MW or more. | LOWER |
| CIP-002-2 | R1.2.6. | Special Protection Systems that support the reliable operation of the Bulk Electric System. | LOWER |
| CIP-002-2 | R1.2.7. | Any additional assets that support the reliable operation of the Bulk Electric System that the Responsible Entity deems appropriate to include in its assessment. | LOWER |
| CIP-002-2 | R2. | Critical Asset Identification — The Responsible Entity shall develop a list of its identified Critical Assets determined through an annual application of the risk-based assessment methodology required in R1. The Responsible Entity shall review this list at least annually, and update it as necessary. | HIGH |
| CIP-002-2 | R3. | Critical Cyber Asset Identification — Using the list of Critical Assets developed pursuant to Requirement R2, the Responsible Entity shall develop a list of associated Critical Cyber Assets essential to the operation of the Critical Asset. Examples at control centers and backup control centers include systems and facilities at master and remote sites that provide monitoring and control, automatic generation control, real-time power system modeling, and real-time inter-utility data exchange. The Responsible Entity shall review this list at least annually, and update it as necessary. For the purpose of Standard CIP- 002-2, Critical Cyber Assets are further qualified to be those having at least one of the following characteristics: | HIGH |
| CIP-002-2 | R3.1 | The Cyber Asset uses a routable protocol to communicate outside the Electronic Security Perimeter; or, | LOWER |
| CIP-002-2 | R3.2. | The Cyber Asset uses a routable protocol within a control center; or, | LOWER |
| CIP-002-2 | R3.3. | The Cyber Asset is dial-up accessible. | LOWER |
| CIP-002-2 | R4. | Annual Approval — The senior manager or delegate(s) shall approve annually the risk- based assessment methodology, the list of Critical Assets and the list of Critical Cyber Assets. Based on Requirements R1, R2, and R3 the Responsible Entity may determine | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| | | that it has no Critical Assets or Critical Cyber Assets. The Responsible Entity shall keep a signed and dated record of the senior manager or delegate(s)'s approval of the risk-based assessment methodology, the list of Critical Assets and the list of Critical Cyber Assets (even if such lists are null.) | |
| CIP-003-2 | R1. | Cyber Security Policy — The Responsible Entity shall document and implement a cyber security policy that represents management's commitment and ability to secure its Critical Cyber Assets. The Responsible Entity shall, at minimum, ensure the following: | MEDIUM |
| CIP-003-2 | R1.1. | The cyber security policy addresses the requirements in Standards CIP-002-2 through CIP-009-2, including provision for emergency situations. | LOWER |
| CIP-003-2 | R1.2. | The cyber security policy is readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets. | LOWER |
| CIP-003-2 | R1.3 | Annual review and approval of the cyber security policy by the senior manager assigned pursuant to R2. | LOWER |
| CIP-003-2 | R2. | Leadership — The Responsible Entity shall assign a senior manager with overall responsibility for leading and managing the entity's implementation of, and adherence to, Standards CIP-002 through CIP-009. | <u>MEDIUM</u> LOWER |
| CIP-003-2 | R2.1. | The senior manager shall be identified by name, title, and date of designation. | LOWER |
| CIP-003-2 | R2.2. | Changes to the senior manager must be documented within thirty calendar days of the effective date. | LOWER |
| CIP-003-2 | R2.3. | Where allowed by Standards CIP-002-2 through CIP-009-2, the senior manager may delegate authority for specific actions to a named delegate or delegates. These delegations shall be documented in the same manner as R2.1 and R2.2, and approved by the senior manager. | LOWER |
| CIP-003-2 | R2.4 | The senior manager or delegate(s), shall authorize and document any exception from the requirements of the cyber security policy. | LOWER |
| CIP-003-2 | R3. | Exceptions — Instances where the Responsible Entity cannot conform to its cyber security policy must be documented as exceptions and authorized by the senior manager or delegate(s). | LOWER |
| CIP-003-2 | R3.1. | Exceptions to the Responsible Entity's cyber security policy must be documented within thirty days of being approved by the senior manager or delegate(s). | LOWER |
| CIP-003-2 | R3.2. | Documented exceptions to the cyber security policy must include an explanation as to why the exception is necessary and any compensating measures. | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| CIP-003-2 | R3.3. | Authorized exceptions to the cyber security policy must be reviewed and approved annually by the senior manager or delegate(s) to ensure the exceptions are still required and valid. Such review and approval shall be documented. | LOWER |
| CIP-003-2 | R4. | Information Protection — The Responsible Entity shall implement and document a program to identify, classify, and protect information associated with Critical Cyber Assets. | MEDIUM |
| CIP-003-2 | R4.1. | The Critical Cyber Asset information to be protected shall include, at a minimum and regardless of media type, operational procedures, lists as required in Standard CIP-002-2, network topology or similar diagrams, floor plans of computing centers that contain Critical Cyber Assets, equipment layouts of Critical Cyber Assets, disaster recovery plans, incident response plans, and security configuration information. | MEDIUM |
| CIP-003-2 | R4.2. | The Responsible Entity shall classify information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. | LOWER |
| CIP-003-2 | R4.3. | The Responsible Entity shall, at least annually, assess adherence to its Critical Cyber Asset information protection program, document the assessment results, and implement an action plan to remediate deficiencies identified during the assessment. | LOWER |
| CIP-003-2 | R5. | Access Control — The Responsible Entity shall document and implement a program for managing access to protected Critical Cyber Asset information. | LOWER |
| CIP-003-2 | R5.1. | The Responsible Entity shall maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information. | LOWER |
| CIP-003-2 | R5.1.1. | Personnel shall be identified by name, title, and the information for which they are responsible for authorizing access. | LOWER |
| CIP-003-2 | R5.1.2. | The list of personnel responsible for authorizing access to protected information shall be verified at least annually. | LOWER |
| CIP-003-2 | R5.2. | The Responsible Entity shall review at least annually the access privileges to protected information to confirm that access privileges are correct and that they correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities. | LOWER |
| CIP-003-2 | R5.3. | The Responsible Entity shall assess and document at least annually the processes for controlling access privileges to protected information. | LOWER |
| CIP-003-2 | R6. | Change Control and Configuration Management — The Responsible Entity shall establish and document a process of change control and configuration management for adding, modifying, replacing, or removing Critical Cyber Asset hardware or software, and implement supporting configuration management activities to identify, control and document all entity or vendor related changes to hardware and software components of Critical Cyber Assets pursuant to the change control process. | LOWER |
| CIP-004-2 | R1. | Awareness — The Responsible Entity shall establish, document, implement, and maintain a security awareness program to ensure personnel having authorized cyber or | LOWER |

| Standard | Requirement | Text of Requirement | VRF |
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| Number | Number | | |
| | | authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security practices. The program shall include security awareness reinforcement on at least a quarterly basis using mechanisms such as: 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.). | |
| CIP-004-2 | R2. | Training — The Responsible Entity shall establish, document, implement, and maintain an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. The cyber security training program shall be reviewed annually, at a minimum, and shall be updated whenever necessary. | LOWER |
| CIP-004-2 | R2.1. | This program will ensure that all personnel having such access to Critical Cyber Assets, including contractors and service vendors, are trained prior to their being granted such access except in specified circumstances such as an emergency. | MEDIUM |
| CIP-004-2 | R2.2. | Training shall cover the policies, access controls, and procedures as developed for the Critical Cyber Assets covered by CIP-004-2, and include, at a minimum, the following required items appropriate to personnel roles and responsibilities: | MEDIUM |
| CIP-004-2 | R2.2.1. | The proper use of Critical Cyber Assets; | LOWER |
| CIP-004-2 | R2.2.2. | Physical and electronic access controls to Critical Cyber Assets; | LOWER |
| CIP-004-2 | R2.2.3. | The proper handling of Critical Cyber Asset information; and, | LOWER |
| CIP-004-2 | R2.2.4. | Action plans and procedures to recover or re-establish Critical Cyber Assets and access thereto following a Cyber Security Incident. | MEDIUM |
| CIP-004-2 | R2.3. | The Responsible Entity shall maintain documentation that training is conducted at least annually, including the date the training was completed and attendance records. | LOWER |
| CIP-004-2 | R3. | Personnel Risk Assessment —The Responsible Entity shall have a documented personnel risk assessment program, in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements, for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. A personnel risk assessment shall be conducted pursuant to that program prior to such personnel being granted such access except in specified circumstances such as an emergency. | MEDIUM |
| CIP-004-2 | R3.1. | The personnel risk assessment program shall at a minimum include:The Responsible Entity shall ensure that each assessment conducted include, at least,identity verification (e.g., Social Security Number verification in the U.S.) and sevenyear | LOWER |

| Standard | Requirement | Text of Requirement | VRF |
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| Number | Number | animinal shash. The Despensible Entity may conduct more detailed reviews as | |
| | | criminal check. The Responsible Entity may conduct more detailed reviews, as | |
| | | permitted by law and subject to existing collective bargaining unit agreements, | |
| | | depending upon the criticality of the position. | |
| CIP-004-2 | R3.2. | The Responsible Entity shall update each personnel risk assessment at least every seven | LOWER |
| | | years after the initial personnel risk assessment or for cause. | |
| CIP-004-2 | R3.3. | The Responsible Entity shall document the results of personnel risk assessments of its | LOWER |
| | | personnel having authorized cyber or authorized unescorted physical access to Critical | |
| | | Cyber Assets, and that personnel risk assessments of contractor and service vendor | |
| | | personnel with such access are conducted pursuant to Standard CIP-004-2. | |
| CIP-004-2 | R4. | Access — The Responsible Entity shall maintain list(s) of personnel with authorized cyber | LOWER |
| | | or authorized unescorted physical access to Critical Cyber Assets, including their specific | |
| | | electronic and physical access rights to Critical Cyber Assets. | |
| CIP-004-2 | R4.1. | The Responsible Entity shall review the list(s) of its personnel who have such access to | LOWER |
| | | Critical Cyber Assets quarterly, and update the list(s) within seven calendar days of any | |
| | | change of personnel with such access to Critical Cyber Assets, or any change in the | |
| | | access rights of such personnel. The Responsible Entity shall ensure access list(s) for | |
| | | contractors and service vendors are properly maintained. | |
| CIP-004-2 | R4.2. | The Responsible Entity shall revoke such access to Critical Cyber Assets within 24 hours | LOWER |
| | | for personnel terminated for cause and within seven calendar days for personnel who no | |
| | | longer require such access to Critical Cyber Assets. | |
| CIP-005-2 | R1. | Electronic Security Perimeter — The Responsible Entity shall ensure that every Critical | MEDIUM |
| | | Cyber Asset resides within an Electronic Security Perimeter. The Responsible Entity shall | |
| | | identify and document the Electronic Security Perimeter(s) and all access points to the | |
| | | perimeter(s). | |
| CIP-005-2 | R1.1. | Access points to the Electronic Security Perimeter(s) shall include any externally | MEDIUM |
| | | connected communication end point (for example, dial-up modems) terminating at any | |
| | | device within the Electronic Security Perimeter(s). | |
| CIP-005-2 | R1.2. | For a dial-up accessible Critical Cyber Asset that uses a non-routable protocol, the | MEDIUM |
| | | Responsible Entity shall define an Electronic Security Perimeter for that single access | |
| | | point at the dial-up device. | |
| CIP-005-2 | R1.3. | Communication links connecting discrete Electronic Security Perimeters shall not be | MEDIUM |
| | | considered part of the Electronic Security Perimeter. However, end points of these | |
| | | communication links within the Electronic Security Perimeter(s) shall be considered | |
| | | access points to the Electronic Security Perimeter(s). | |
| CIP-005-2 | R1.4. | Any non-critical Cyber Asset within a defined Electronic Security Perimeter shall be | MEDIUM |
| | | identified and protected pursuant to the requirements of Standard CIP-005-2. | |
| CIP-005-2 | R1.5. | Cyber Assets used in the access control and/or monitoring of the Electronic Security | MEDIUM |
| CIT=00J-2 | N1.J. | , | - |

| Standard | Requirement | Text of Requirement | VRF |
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| Number | Number | Device stor(s) shall be offered at the protective recovering as a specified in Stordard CID | |
| | | Perimeter(s) shall be afforded the protective measures as a specified in Standard CIP- 003-2; Standard CIP-004-2 Requirement R3; Standard CIP-005-2 Requirements R2 | |
| | | and R3; Standard CIP-006-2 Requirement R3; Standard CIP-007-2 Requirements R1 and | |
| | | R3 through R9; Standard CIP-008-2; and Standard CIP-009-2. | |
| | D4 C | The Responsible Entity shall maintain documentation of Electronic Security | LOWER |
| CIP-005-2 | R1.6. | Perimeter(s), all interconnected Critical and non-critical Cyber Assets within the | LOWER |
| | | Electronic Security Perimeter(s), all electronic access points to the Electronic Security | |
| | | Perimeter(s) and the Cyber Assets deployed for the access control and monitoring of | |
| | | these access points. | |
| CIP-005-2 | R2. | Electronic Access Controls — The Responsible Entity shall implement and document the | MEDIUM |
| | Π2. | organizational processes and technical and procedural mechanisms for control of | |
| | | electronic access at all electronic access points to the Electronic Security Perimeter(s). | |
| CIP-005-2 | R2.1. | These processes and mechanisms shall use an access control model that denies access | MEDIUM |
| | | by default, such that explicit access permissions must be specified. | |
| CIP-005-2 | R2.2. | At all access points to the Electronic Security Perimeter(s), the Responsible Entity shall | MEDIUM |
| 0 | | enable only ports and services required for operations and for monitoring Cyber Assets | |
| | | within the Electronic Security Perimeter, and shall document, individually or by specified | |
| | | grouping, the configuration of those ports and services. | |
| CIP-005-2 | R2.3. | The Responsible Entity shall implement and maintain a procedure for securing dial-up | MEDIUM |
| | | access to the Electronic Security Perimeter(s). | |
| CIP-005-2 | R2.4. | Where external interactive access into the Electronic Security Perimeter has been | MEDIUM |
| | | enabled, the Responsible Entity shall implement strong procedural or technical controls | |
| | | at the access points to ensure authenticity of the accessing party, where technically | |
| | | feasible. | |
| CIP-005-2 | R2.5. | The required documentation shall, at least, identify and describe: | LOWER |
| CIP-005-2 | R2.5.1. | The processes for access request and authorization. | LOWER |
| CIP-005-2 | R2.5.2. | The authentication methods. | LOWER |
| CIP-005-2 | R2.5.3. | The review process for authorization rights, in accordance with Standard CIP-004-2 | LOWER |
| | | Requirement R4. | |
| CIP-005-2 | R2.5.4. | The controls used to secure dial-up accessible connections. | LOWER |
| CIP-005-2 | R2.6. | Appropriate Use Banner — Where technically feasible, electronic access control | LOWER |
| | | devices shall display an appropriate use banner on the user screen upon all interactive | |
| | | access attempts. The Responsible Entity shall maintain a document identifying the | |
| | | content of the banner. | |

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| CIP-005-2 | R3. | Monitoring Electronic Access — The Responsible Entity shall implement and document an electronic or manual process(es) for monitoring and logging access at access points to the Electronic Security Perimeter(s) twenty-four hours a day, seven days a week. | MEDIUM |
| CIP-005-2 | R3.1. | For dial-up accessible Critical Cyber Assets that use non-routable protocols, the Responsible Entity shall implement and document monitoring process(es) at each access point to the dial-up device, where technically feasible. | MEDIUM |
| CIP-005-2 | R3.2. | Where technically feasible, the security monitoring process(es) shall detect and alert for attempts at or actual unauthorized accesses. These alerts shall provide for appropriate notification to designated response personnel. Where alerting is not technically feasible, the Responsible Entity shall review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. | MEDIUM |
| CIP-005-2 | R4. | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of the electronic access points to the Electronic Security Perimeter(s) at least annually. The vulnerability assessment shall include, at a minimum, the following: | MEDIUM |
| CIP-005-2 | R4.1. | A document identifying the vulnerability assessment process; | LOWER |
| CIP-005-2 | R4.2. | A review to verify that only ports and services required for operations at these access points are enabled; | MEDIUM |
| CIP-005-2 | R4.3. | The discovery of all access points to the Electronic Security Perimeter; | MEDIUM |
| CIP-005-2 | R4.4. | A review of controls for default accounts, passwords, and network management community strings; | MEDIUM |
| CIP-005-2 | R4.5. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | MEDIUM |
| CIP-005-2 | R5. | Documentation Review and Maintenance — The Responsible Entity shall review, update, and maintain all documentation to support compliance with the requirements of Standard CIP-005-2. | LOWER |
| CIP-005-2 | R5.1. | The Responsible Entity shall ensure that all documentation required by Standard CIP- 005-2 reflect current configurations and processes and shall review the documents and procedures referenced in Standard CIP-005-2 at least annually. | LOWER |
| CIP-005-2 | R5.2. | The Responsible Entity shall update the documentation to reflect the modification of the network or controls within ninety calendar days of the change. | LOWER |
| CIP-005-2 | R5.3. | The Responsible Entity shall retain electronic access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-2. | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-006-2 | R1. | Physical Security Plan — The Responsible Entity shall document, implement, and maintain a physical security plan, approved by the senior manager or delegate(s) that shall address, at a minimum, the following: | MEDIUM |
| CIP-006-2 | R1.1. | All Cyber Assets within an Electronic Security Perimeter shall reside within an identified Physical Security Perimeter. Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity shall deploy and document alternative measures to control physical access to such Cyber Assets. | MEDIUM |
| CIP-006-2 | R1.2. | Identification of all physical access points through each Physical Security Perimeter and measures to control entry at those access points. | MEDIUM |
| CIP-006-2 | R1.3 | Processes, tools, and procedures to monitor physical access to the perimeter(s). | MEDIUM |
| CIP-006-2 | R1.4 | Appropriate use of physical access controls as described in Requirement R4 including visitor pass management, response to loss, and prohibition of inappropriate use of physical access controls. | MEDIUM |
| CIP-006-2 | R1.5 | Review of access authorization requests and revocation of access authorization, in accordance with CIP-004-2 Requirement R4. | MEDIUM |
| CIP-006-2 | R1.6 | Continuous escorted access within the Physical Security Perimeter of personnel not authorized for unescorted access. | MEDIUM |
| CIP-006-2 | R1.7 | Update of the physical security plan within thirty calendar days of the completion of any physical security system redesign or reconfiguration, including, but not limited to, addition or removal of access points through the Physical Security Perimeter, physical access controls, monitoring controls, or logging controls. | LOWER |
| CIP-006-2 | R1.8 | Annual review of the physical security plan. | LOWER |
| CIP-006-2 | R2 | Protection of Physical Access Control Systems — Cyber Assets that authorize and/or log access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers, shall: | MEDIUM |
| CIP-006-2 | R2.1. | Be protected from unauthorized physical access. | MEDIUM |
| CIP-006-2 | R2.2. | Be afforded the protective measures specified in Standard CIP-003-2; Standard CIP-004-2 Requirement R3; Standard CIP-005-2 Requirements R2 and R3; Standard CIP-006-2 Requirements R4 and R5; Standard CIP-007-2; Standard CIP-008-2; and Standard CIP- 009-2. | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-006-2 | R3 | Protection of Electronic Access Control Systems — Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall reside within an identified Physical Security Perimeter. | MEDIUM |
| CIP-006-2 | R4 | Physical Access Controls — The Responsible Entity shall document and implement the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. The Responsible Entity shall implement one or more of the following physical access methods: | MEDIUM |
| | | • Card Key: A means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from one perimeter to another. | |
| | | Special Locks: These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. | |
| | | • Security Personnel: Personnel responsible for controlling physical access who may reside on-site or at a monitoring station. | |
| | | Other Authentication Devices: Biometric, keypad, token, or other equivalent devices that control physical access to the Critical Cyber Assets | |
| CIP-006-2 | R5 | Monitoring Physical Access — The Responsible Entity shall document and implement the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. Unauthorized access attempts shall be reviewed immediately and handled in accordance with the procedures specified in Requirement CIP-008-2. One or more of the following monitoring methods shall be used: | MEDIUM |
| | | • Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel responsible for response. | |
| | | • Human Observation of Access Points: Monitoring of physical access points by authorized personnel as specified in Requirement R4. | |
| CIP-006-2 | R6 | Logging Physical Access — Logging shall record sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. The Responsible Entity shall implement and document the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| | | Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method. | |
| | | • Video Recording: Electronic capture of video images of sufficient quality to determine identity. | |
| | | Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4 | |
| CIP-006-2 | R7 | Access Log Retention — The responsible entity shall retain physical access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-2. | LOWER |
| CIP-006-2 | R8 | Maintenance and Testing — The Responsible Entity shall implement a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly. The program must include, at a minimum, the following: | MEDIUM |
| CIP-006-2 | R8.1 | Testing and maintenance of all physical security mechanisms on a cycle no longer than three years. | MEDIUM |
| CIP-006-2 | R8.2 | Retention of testing and maintenance records for the cycle determined by the Responsible Entity in Requirement R8.1. | LOWER |
| CIP-006-2 | R8.3 | Retention of outage records regarding access controls, logging, and monitoring for a minimum of one calendar year. | LOWER |
| CIP-007-2 | R1. | Test Procedures — The Responsible Entity shall ensure that new Cyber Assets and significant changes to existing Cyber Assets within the Electronic Security Perimeter do not adversely affect existing cyber security controls. For purposes of Standard CIP-007-2, a significant change shall, at a minimum, include implementation of security patches, cumulative service packs, vendor releases, and version upgrades of operating systems, applications, database platforms, or other third-party software or firmware. | MEDIUM |
| CIP-007-2 | R1.1. | The Responsible Entity shall create, implement, and maintain cyber security test procedures in a manner that minimizes adverse effects on the production system or its operation. | LOWER |
| CIP-007-2 | R1.2. | The Responsible Entity shall document that testing is performed in a manner that reflects the production environment. | LOWER |
| CIP-007-2 | R1.3. | The Responsible Entity shall document test results. | LOWER |
| CIP-007-2 | R2. | Ports and Services — The Responsible Entity shall establish, document and implement a process to ensure that only those ports and services required for normal and emergency | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| | | operations are enabled. | |
| CIP-007-2 | R2.1. | The Responsible Entity shall enable only those ports and services required for normal and emergency operations. | MEDIUM |
| CIP-007-2 | R2.2. | The Responsible Entity shall disable other ports and services, including those used for testing purposes, prior to production use of all Cyber Assets inside the Electronic Security Perimeter(s). | MEDIUM |
| CIP-007-2 | R2.3. | In the case where unused ports and services cannot be disabled due to technical limitations, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | MEDIUM |
| CIP-007-2 | R3. | Security Patch Management — The Responsible Entity, either separately or as a component of the documented configuration management process specified in CIP-003-2 Requirement R6, shall establish, document and implement a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | LOWER |
| CIP-007-2 | R3.1. | The Responsible Entity shall document the assessment of security patches and security upgrades for applicability within thirty calendar days of availability of the patches or upgrades. | LOWER |
| CIP-007-2 | R3.2. | The Responsible Entity shall document the implementation of security patches. In any case where the patch is not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | LOWER |
| CIP-007-2 | R4. | Malicious Software Prevention — The Responsible Entity shall use anti-virus software and other malicious software ("malware") prevention tools, where technically feasible, to detect, prevent, deter, and mitigate the introduction, exposure, and propagation of malware on all Cyber Assets within the Electronic Security Perimeter(s). | MEDIUM |
| CIP-007-2 | R4.1. | The Responsible Entity shall document and implement anti-virus and malware prevention tools. In the case where anti-virus software and malware prevention tools are not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | MEDIUM |
| CIP-007-2 | R4.2. | The Responsible Entity shall document and implement a process for the update of anti-virus and malware prevention "signatures." The process must address testing and installing the signatures. | MEDIUM |
| CIP-007-2 | R5. | Account Management — The Responsible Entity shall establish, implement, and document technical and procedural controls that enforce access authentication of, and accountability for, all user activity, and that minimize the risk of unauthorized system access. | LOWER |
| CIP-007-2 | R5.1. | The Responsible Entity shall ensure that individual and shared system accounts and authorized access permissions are consistent with the concept of "need to know" with | MEDIUM |

| Standard Number | Standard Requirement Text of Requirement Number Number | | VRF |
|--------------------|--|--|--------|
| | | respect to work functions performed. | |
| CIP-007-2 | R5.1.1. | The Responsible Entity shall ensure that user accounts are implemented as approved by designated personnel. Refer to Standard CIP-003-2 Requirement R5. | LOWER |
| CIP-007-2 | R5.1.2. | The Responsible Entity shall establish methods, processes, and procedures that generate logs of sufficient detail to create historical audit trails of individual user account access activity for a minimum of ninety days. | LOWER |
| CIP-007-2 | R5.1.3. | The Responsible Entity shall review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003-2 Requirement R5 and Standard CIP-004-2 Requirement R4. | MEDIUM |
| CIP-007-2 | R5.2. | The Responsible Entity shall implement a policy to minimize and manage the scope and acceptable use of administrator, shared, and other generic account privileges including factory default accounts. | LOWER |
| CIP-007-2 | R5.2.1. | The policy shall include the removal, disabling, or renaming of such accounts where possible. For such accounts that must remain enabled, passwords shall be changed prior to putting any system into service. | MEDIUM |
| CIP-007-2 | R5.2.2. | The Responsible Entity shall identify those individuals with access to shared accounts. | LOWER |
| CIP-007-2 | R5.2.3. | Where such accounts must be shared, the Responsible Entity shall have a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps for securing the account in the event of personnel changes (for example, change in assignment or termination). | MEDIUM |
| CIP-007-2 | R5.3. | At a minimum, the Responsible Entity shall require and use passwords, subject to the following, as technically feasible: | LOWER |
| CIP-007-2 | R5.3.1. | Each password shall be a minimum of six characters. | LOWER |
| CIP-007-2 | R5.3.2. | Each password shall consist of a combination of alpha, numeric, and "special" characters. | LOWER |
| CIP-007-2 | R5.3.3. | Each password shall be changed at least annually, or more frequently based on risk. | MEDIUM |
| CIP-007-2 | | | LOWER |
| CIP-007-2 | R6.1. | The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter. | MEDIUM |
| CIP-007-2 | R6.2. | The security monitoring controls shall issue automated or manual alerts for detected Cyber Security Incidents. | MEDIUM |
| CIP-007-2 | R6.3. | The Responsible Entity shall maintain logs of system events related to cyber security, | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| Number | Number | where technically feasible, to support incident response as required in Standard CIP-008- 2. | |
| CIP-007-2 | R6.4. | The Responsible Entity shall retain all logs specified in Requirement R6 for ninety calendar days. | LOWER |
| CIP-007-2 | R6.5. | The Responsible Entity shall review logs of system events related to cyber security and maintain records documenting review of logs. | LOWER |
| CIP-007-2 | R7. | Disposal or Redeployment — The Responsible Entity shall establish and implement formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-2. | LOWER |
| CIP-007-2 | R7.1. | Prior to the disposal of such assets, the Responsible Entity shall destroy or erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | LOWER |
| CIP-007-2 | R7.2. | Prior to redeployment of such assets, the Responsible Entity shall, at a minimum, erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | LOWER |
| CIP-007-2 | R7.3. | The Responsible Entity shall maintain records that such assets were disposed of or redeployed in accordance with documented procedures. | LOWER |
| CIP-007-2 | R8 | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of all Cyber Assets within the Electronic Security Perimeter at least annually. The vulnerability assessment shall include, at a minimum, the following: | LOWER |
| CIP-007-2 | R8.1. | A document identifying the vulnerability assessment process; | LOWER |
| CIP-007-2 | R8.2. | A review to verify that only ports and services required for operation of the Cyber Assets within the Electronic Security Perimeter are enabled; | MEDIUM |
| CIP-007-2 | R8.3. | A review of controls for default accounts; and, | MEDIUM |
| CIP-007-2 | R8.4. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | MEDIUM |
| CIP-007-2 | R9 | Documentation Review and Maintenance — The Responsible Entity shall review and update the documentation specified in Standard CIP-007-2 at least annually. Changes resulting from modifications to the systems or controls shall be documented within thirty calendar days of the change being completed. | LOWER |
| CIP-008-2 | R1. | Cyber Security Incident Response Plan — The Responsible Entity shall develop and maintain a Cyber Security Incident response plan and implement the plan in response to Cyber Security Incidents. The Cyber Security Incident response plan shall address, at a minimum, the following: | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-008-2 | R1.1. | Procedures to characterize and classify events as reportable Cyber Security Incidents. | LOWER |
| CIP-008-2 | R1.2. | Response actions, including roles and responsibilities of Cyber Security Incident response teams, Cyber Security Incident handling procedures, and communication plans. | LOWER |
| CIP-008-2 | R1.3. | Process for reporting Cyber Security Incidents to the Electricity Sector Information Sharing and Analysis Center (ES-ISAC). The Responsible Entity must ensure that all reportable Cyber Security Incidents are reported to the ES-ISAC either directly or through an intermediary. | LOWER |
| CIP-008-2 | R1.4. | Process for updating the Cyber Security Incident response plan within thirty calendar days of any changes. | LOWER |
| CIP-008-2 | R1.5. | Process for ensuring that the Cyber Security Incident response plan is reviewed at least annually. | LOWER |
| CIP-008-2 | R1.6. | Process for ensuring the Cyber Security Incident response plan is tested at least annually. A test of the Cyber Security Incident response plan can range from a paper drill, to a full operational exercise, to the response to an actual incident. Testing the Cyber Security Incident response plan does not require removing a component or system from service during the test. | LOWER |
| CIP-008-2 | R2 | Cyber Security Incident Documentation — The Responsible Entity shall keep relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 for three calendar years. | LOWER |
| CIP-009-2 | R1 | Recovery Plans — The Responsible Entity shall create and annually review recovery plan(s) for Critical Cyber Assets. The recovery plan(s) shall address at a minimum the following: | MEDIUM |
| CIP-009-2 | R1.1. | Specify the required actions in response to events or conditions of varying duration and severity that would activate the recovery plan(s). | MEDIUM |
| CIP-009-2 | R1.2. | Define the roles and responsibilities of responders. | MEDIUM |
| CIP-009-2 | R2 | Exercises — The recovery plan(s) shall be exercised at least annually. An exercise of the recovery plan(s) can range from a paper drill, to a full operational exercise, to recovery from an actual incident. | LOWER |
| CIP-009-2 | R3 | Change Control — Recovery plan(s) shall be updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. Updates shall be communicated to personnel responsible for the activation and implementation of the recovery plan(s) within thirty calendar days of the change being completed. | LOWER |
| CIP-009-2 | R4 | Backup and Restore — The recovery plan(s) shall include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. For example, backups may include spare electronic components or equipment, | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| | | written documentation of configuration settings, tape backup, etc. | |
| CIP-009-2 | R5 | Testing Backup Media — Information essential to recovery that is stored on backup media shall be tested at least annually to ensure that the information is available. Testing can be completed off site. | LOWER |

EXHIBIT C CIP VIOLATION RISK FACTORS AND VIOLATION SEVERITY LEVELS – VERSION 3 (CLEAN AND REDLINE)

CIP Version 3 Violation Severity Levels and Violation Risk Factors

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|---|--|--|
| CIP-002-3 | R1. | Critical Asset Identification Method — The Responsible Entity shall identify and document a risk-based assessment methodology to use to identify its Critical Assets. | N/A | N/A | N/A | The responsible entity has not documented a risk- based assessment methodology to use to identify its Critical Assets as specified in R1. |
| CIP-002-3 | R1.1 | The Responsible Entity shall maintain documentation describing its risk- based assessment methodology that includes procedures and evaluation criteria. | N/A | The Responsible Entity maintained documentation describing its risk- based assessment methodology which includes evaluation criteria, but does not include procedures. | The Responsible Entity maintained documentation describing its risk- based assessment methodology that includes procedures but does not include evaluation criteria. | The Responsible Entity did not maintain documentation describing its risk- based assessment methodology that includes procedures and evaluation criteria. |
| CIP-002-3 | R1.2 | The risk-based assessment shall consider the following assets: | N/A | N/A | N/A | The Responsible Entity did not consider all of the asset types listed in R1.2.1 through R1.2.7 in its risk- based assessment. |
| CIP-002-3 | R1.2.1. | Control centers and backup control centers performing the functions of the entities listed in the Applicability section of this standard. | N/A | N/A | N/A | N/A |
| CIP-002-3 | R1.2.2. | Transmission substations that support the reliable operation of the Bulk Electric System. | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|--|---|
| CIP-002-3 | R1.2.3. | Generation resources that support the reliable operation of the Bulk Electric System. | N/A | N/A | N/A | N/A |
| CIP-002-3 | R1.2.4. | Systems and facilities critical to system restoration, including blackstart generators and substations in the electrical path of transmission lines used for initial system restoration. | N/A | N/A | N/A | N/A |
| CIP-002-3 | R1.2.5. | Systems and facilities critical to automatic load shedding under a common control system capable of shedding 300 MW or more. | N/A | N/A | N/A | N/A |
| CIP-002-3 | R1.2.6. | Special Protection Systems that support the reliable operation of the Bulk Electric System. | N/A | N/A | N/A | N/A |
| CIP-002-3 | R1.2.7. | Any additional assets that support the reliable operation of the Bulk Electric System that the Responsible Entity deems appropriate to include in its assessment. | N/A | N/A | N/A | N/A |
| CIP-002-3 | R2. | Critical Asset Identification — The Responsible Entity shall develop a list of its identified Critical Assets determined through an annual application of the risk-based assessment methodology required in R1. The Responsible Entity shall review this list at least annually, and update it as necessary. | N/A | N/A | The Responsible Entity has developed a list of Critical Assets but the list has not been reviewed and updated annually as required. | The Responsible Entity did not develop a list of its identified Critical Assets even if such list is null. |
| CIP-002-3 | R3. | Critical Cyber Asset Identification — Using the list of Critical Assets developed pursuant to Requirement R2, the Responsible Entity shall develop a list of associated Critical Cyber Assets essential to the | N/A | N/A | The Responsible Entity has developed a list of associated Critical Cyber Assets essential to the operation of the | The Responsible Entity did not develop a list of associated Critical Cyber Assets essential to the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|---|---|
| | | operation of the Critical Asset. Examples at control centers and backup control centers include systems and facilities at master and remote sites that provide monitoring and control, automatic generation control, real-time power system modeling, and real-time inter-utility data exchange. The Responsible Entity shall review this list at least annually, and update it as necessary. For the purpose of Standard CIP-002- 3, Critical Cyber Assets are further qualified to be those having at least one of the following characteristics: | | | Critical Asset list as per requirement R2 but the list has not been reviewed and updated annually as required. | operation of the Critical Asset list as per requirement R2 even if such list is null. |
| CIP-002-3 | R3.1 | The Cyber Asset uses a routable protocol to communicate outside the Electronic Security Perimeter; or, | N/A | N/A | N/A | A Cyber Asset essential to the operation of the Critical Asset was identified that met the criteria in this requirement but was not included in the Critical Cyber Asset List. |
| CIP-002-3 | R3.2. | The Cyber Asset uses a routable protocol within a control center; or, | N/A | N/A | N/A | A Cyber Asset essential to the operation of the Critical Asset was identified that met the criteria in this requirement but was not included in the Critical Cyber Asset List. |
| CIP-002-3 | R3.3. | The Cyber Asset is dial-up accessible. | N/A | N/A | N/A | A Cyber Asset |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|---|---|--|
| | | | | | | essential to the operation of the Critical Asset was identified that met the criteria in this requirement but was not included in the Critical Cyber Asset List. |
| CIP-002-3 | R4. | Annual Approval — The senior manager or delegate(s) shall approve annually the risk-based assessment methodology, the list of Critical Assets and the list of Critical Cyber Assets. Based on Requirements R1, R2, and R3 the Responsible Entity may determine that it has no Critical Assets or Critical Cyber Assets. The Responsible Entity shall keep a signed and dated record of the senior manager or delegate(s)'s approval of the risk-based assessment methodology, the list of Critical Assets and the list of Critical Cyber Assets (even if such lists are null.) | N/A | The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s)'s annual approval of the risk- based assessment methodology, the list of Critical Assets or the list of Critical Cyber Assets (even if such lists are null.) | The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s)'s annual approval of two of the following: the risk-based assessment methodology, the list of Critical Assets or the list of Critical Cyber Assets (even if such lists are null.) | The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s) annual approval of 1) A risk based assessment methodology for identification of Critical Assets, 2) a signed and dated approval of the list of Critical Assets, nor 3) a signed and dated approval of the list of Critical Cyber Assets (even if such lists are null.) |
| CIP-003-3 | R1. | Cyber Security Policy — The Responsible Entity shall document and implement a cyber security policy that represents management's commitment and ability to secure its Critical Cyber Assets. The Responsible Entity shall, | N/A | N/A | N/A | The Responsible Entity has not documented or implemented a cyber security policy. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|----------|---|
| CIP-003-3 | R1.1. | at minimum, ensure the following: The cyber security policy addresses the requirements in Standards CIP- 002-3 through CIP-009-3, including provision for emergency situations. | N/A | N/A | N/A | The Responsible Entity's cyber security policy does not address all the requirements in Standards CIP-002 through CIP-009, including provision for emergency situations. |
| CIP-003-3 | R1.2. | The cyber security policy is readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets. | N/A | N/A | N/A | The Responsible Entity's cyber security policy is not readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets. |
| CIP-003-3 | R1.3 | Annual review and approval of the cyber security policy by the senior manager assigned pursuant to R2. | N/A | N/A | N/A | The Responsible Entity's senior manager, assigned pursuant to R2, did not complete the annual review and approval of its cyber security policy. |
| CIP-003-3 | R2. | Leadership — The Responsible Entity shall assign a senior manager with overall responsibility for leading and managing the entity's implementation of, and adherence to, Standards CIP-002-3 through CIP- 009-3. | N/A | N/A | N/A | The Responsible Entity has not assigned a single senior manager with overall responsibility and authority for leading and managing the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|---|---|
| | | | | | | entity's implementation of, and adherence to, Standards CIP-002 through CIP-009. |
| CIP-003-3 | R2.1. | The senior manager shall be identified by name, title, and date of designation. | N/A | N/A | N/A | Identification of the senior manager is missing one of the following: name, title, or date of designation. |
| CIP-003-3 | R2.2. | Changes to the senior manager must be documented within thirty calendar days of the effective date. | N/A | N/A | N/A | Changes to the senior manager were not documented within 30 days of the effective date. |
| CIP-003-3 | R2.3. | Where allowed by Standards CIP- 002-3 through CIP-009-3, the senior manager may delegate authority for specific actions to a named delegate or delegates. These delegations shall be documented in the same manner as R2.1 and R2.2, and approved by the senior manager. | N/A | N/A | The identification of a senior manager's delegate does not include at least one of the following; name, title, or date of the designation, OR The document is not approved by the senior manager, OR | A senior manager's delegate is not identified by name, title, and date of designation; the document delegating the authority does not identify the authority being delegated; the document delegating the authority is not approved by the senior manager; |
| | | | | | Changes to the | AND |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|--|---|
| | | | | | delegated authority are not documented within thirty calendar days of the effective date. | changes to the delegated authority are not documented within thirty calendar days of the effective date. |
| CIP-003-3 | R2.4 | The senior manager or delegate(s), shall authorize and document any exception from the requirements of the cyber security policy. | N/A | N/A | N/A | The senior manager or delegate(s) did not authorize and document any exceptions from the requirements of the cyber security policy as required. |
| CIP-003-3 | R3. | Exceptions — Instances where the Responsible Entity cannot conform to its cyber security policy must be documented as exceptions and authorized by the senior manager or delegate(s). | N/A | N/A | In Instances where the Responsible Entity cannot conform to its cyber security policy, in R1, exceptions were documented, but were not authorized by the senior manager or delegate(s). | In Instances where the Responsible Entity cannot conform to its cyber security policy, in R1, exceptions were not documented. |
| CIP-003-3 | R3.1. | Exceptions to the Responsible Entity's cyber security policy must be documented within thirty days of being approved by the senior manager or delegate(s). | N/A | N/A | N/A | Exceptions to the Responsible Entity's cyber security policy were not documented within 30 days of being approved by the senior manager or delegate(s). |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-003-3 | R3.2. | Documented exceptions to the cyber security policy must include an explanation as to why the exception is necessary and any compensating measures. | N/A | N/A | The Responsible Entity has a documented exception to the cyber security policy in R1 but did not include either : | The Responsible Entity has a documented exception to the cyber security policy in R1 but did not include both : |
| | | | | | 1) an explanation as to why the exception is necessary, or | 1) an explanation as to why the exception is necessary, and |
| | | | | | 2) any compensating measures. | 2) any compensating measures. |
| CIP-003-3 | R3.3. | Authorized exceptions to the cyber security policy must be reviewed and approved annually by the senior manager or delegate(s) to ensure the exceptions are still required and valid. Such review and approval shall be documented. | N/A | N/A | N/A | Exceptions to the cyber security policy were not reviewed or were not approved on an annual basis by the senior manager or delegate(s) to ensure the exceptions are still required and valid or the review and approval is not documented. |
| CIP-003-3 | R4. | Information Protection — The Responsible Entity shall implement and document a program to identify, classify, and protect information associated with Critical Cyber Assets. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document a program to identify, classify, and protect information |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | associated with Critical Cyber Assets. |
| CIP-003-3 | R4.1. | The Critical Cyber Asset information to be protected shall include, at a minimum and regardless of media type, operational procedures, lists as required in Standard CIP- 002-3, network topology or similar diagrams, floor plans of computing centers that contain Critical Cyber Assets, equipment layouts of Critical Cyber Assets, disaster recovery plans, incident response plans, and security configuration information. | N/A | N/A | The information protection program does not include one of the minimum information types to be protected as detailed in R4.1. | The information protection program does not include two or more of the minimum information types to be protected as detailed in R4.1. |
| CIP-003-3 | R4.2. | The Responsible Entity shall classify information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. | N/A | N/A | N/A | The Responsible Entity did not classify the information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. |
| CIP-003-3 | R4.3. | The Responsible Entity shall, at least annually, assess adherence to its Critical Cyber Asset information protection program, document the assessment results, and implement an action plan to remediate deficiencies identified during the assessment. | N/A | N/A | N/A | The Responsible Entity did not annually assess adherence to its Critical Cyber Asset information protection program, including documentation of the assessment results, OR The Responsible |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | Entity did not implement an action plan to remediate deficiencies identified during the assessment. |
| CIP-003-3 | R5. | Access Control — The Responsible Entity shall document and implement a program for managing access to protected Critical Cyber Asset information. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document a program for managing access to protected Critical Cyber Asset information. |
| CIP-003-3 | R5.1. | The Responsible Entity shall maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information. | N/A | N/A | The Responsible Entity maintained a list of designated personnel for authorizing either logical or physical access but not both. | The Responsible Entity did not maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information. |
| CIP-003-3 | R5.1.1. | Personnel shall be identified by name, title, and the information for which they are responsible for authorizing access. | N/A | N/A | The Responsible Entity did identify the personnel by name, title, and the information for which they are responsible for authorizing access, but the business phone is missing. | Personnel are not identified by name, title, or the information for which they are responsible for authorizing access. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-003-3 | R5.1.2. | The list of personnel responsible for authorizing access to protected information shall be verified at least annually. | N/A | N/A | N/A | The Responsible Entity did not verify at least annually the list of personnel responsible for authorizing access to protected information. |
| CIP-003-3 | R5.2. | The Responsible Entity shall review at least annually the access privileges to protected information to confirm that access privileges are correct and that they correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities. | N/A | N/A | N/A | The Responsible Entity did not review at least annually the access privileges to protected information to confirm that access privileges are correct and that they correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities. |
| CIP-003-3 | R5.3. | The Responsible Entity shall assess and document at least annually the processes for controlling access privileges to protected information. | N/A | N/A | N/A | The Responsible Entity did not assess and document at least annually the processes for controlling access privileges to protected information. |
| CIP-003-3 | R6. | Change Control and Configuration Management — The Responsible Entity shall establish and document a process of change control and | N/A | N/A | N/A | The Responsible Entity has not established or |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | configuration management for adding, modifying, replacing, or removing Critical Cyber Asset hardware or software, and implement supporting configuration management activities to identify, control and document all entity or vendor related changes to hardware and software components of Critical Cyber Assets pursuant to the change control process. | | | | documented a change control process for the activities required in R6, OR The Responsible Entity has not established or documented a configuration management process for the activities required in R6. |
| CIP-004-3 | R1. | Awareness — The Responsible Entity shall establish, document, implement, and maintain a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security practices. The program shall include security awareness reinforcement on at least a quarterly basis using mechanisms such as: Direct communications (e.g. emails, memos, computer based training, etc.); Indirect communications (e.g. posters, intranet, | N/A | N/A | The Responsible ^{[1}] Entity did not provide security awareness reinforcement on at least a quarterly basis. | The Responsible Entity did not establish, implement, maintain, or document a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security practices. |

¹ Please note that FERC's January 20, 2011 Order on Version 2 And Version 3 Violation Risk Factors And Violation Severity Levels For Critical Infrastructure Protection Reliability Standards dictated "Responsible Entity" to be changed to "Responsibility Entity." NERC assumes FERC intended the VSL to read "Responsible Entity" and therefore is not making this change. NERC proposes to remove this footnote from the final approved list of VSLs.

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | brochures, etc.); Management support and reinforcement (e.g., presentations, meetings, etc.). | | | | |
| CIP-004-3 | R2. | Training — The Responsible Entity shall establish, document, implement, and maintain an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. The cyber security training program shall be reviewed annually, at a minimum, and shall be updated whenever necessary. | N/A | N/A | The Responsible ^{[2}] Entity did not review the training program on an annual basis. | The Responsible Entity did not establish, implement, maintain, or document an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. |
| CIP-004-3 | R2.1. | This program will ensure that all personnel having such access to Critical Cyber Assets, including contractors and service vendors, are trained prior to their being granted such access except in specified circumstances such as an emergency. | N/A | N/A | N/A | Not all personnel having authorized cyber or unescorted physical access to Critical Cyber Assets, including contractors and service vendors, were trained prior to their being granted such access except in specified circumstances such as an emergency. |

² Please see previous footnote. NERC proposes to remove this footnote from the final approved list of VSLs.

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-004-3 | R2.2. | Training shall cover the policies, access controls, and procedures as developed for the Critical Cyber Assets covered by CIP-004-3, and include, at a minimum, the following required items appropriate to personnel roles and responsibilities: | N/A | N/A | N/A | The training does not include one or more of the minimum topics as detailed in R2.2.1, R2.2.2, R2.2.3, R2.2.4. |
| CIP-004-3 | R2.2.1. | The proper use of Critical Cyber Assets; | N/A | N/A | N/A | N/A |
| CIP-004-3 | R2.2.2. | Physical and electronic access controls to Critical Cyber Assets; | N/A | N/A | N/A | N/A |
| CIP-004-3 | R2.2.3. | The proper handling of Critical Cyber Asset information; and, | N/A | N/A | N/A | N/A |
| CIP-004-3 | R2.2.4. | Action plans and procedures to recover or re-establish Critical Cyber Assets and access thereto following a Cyber Security Incident. | N/A | N/A | N/A | N/A |
| CIP-004-3 | R2.3. | The Responsible Entity shall maintain documentation that training is conducted at least annually, including the date the training was completed and attendance records. | N/A | N/A | The Responsible Entity did maintain documentation that training is conducted at least annually, but did not include attendance records. | The Responsible Entity did not maintain documentation that training is conducted at least annually, including the date the training was completed and attendance records. |
| CIP-004-3 | R3. | Personnel Risk Assessment —The Responsible Entity shall have a documented personnel risk assessment program, in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements, for personnel having | N/A | The Responsible Entity has a personnel risk assessment program, as stated in R3, for personnel having authorized | The Responsible Entity has a personnel risk assessment program as stated in R3, but conducted the personnel risk | The Responsible Entity does not have a documented personnel risk assessment program, as stated in R3, for personnel |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | authorized cyber or authorized unescorted physical access to Critical Cyber Assets. A personnel risk assessment shall be conducted pursuant to that program prior to such personnel being granted such access except in specified circumstances such as an emergency. The personnel risk assessment program shall at a minimum include: | | cyber or authorized unescorted physical access, but the program is not documented. | assessment pursuant to that program after such personnel were granted such access except in specified circumstances such as an emergency. | having authorized cyber or authorized unescorted physical access. OR The Responsible Entity did not conduct the personnel risk assessment pursuant to that program for personnel granted such access except in specified circumstances such as an emergency. |
| CIP-004-3 | R3.1. | The Responsible Entity shall ensure that each assessment conducted include, at least, identity verification (e.g., Social Security Number verification in the U.S.) and seven year criminal check. The Responsible Entity may conduct more detailed reviews, as permitted by law and subject to existing collective bargaining unit agreements, depending upon the criticality of the position. | N/A | N/A | The Responsible Entity did not ensure that an assessment conducted included an identity verification (e.g., Social Security Number verification in the U.S.) or a seven-year criminal check. | The Responsible Entity did not ensure that each assessment conducted include, at least, identity verification (e.g., Social Security Number verification in the U.S.) and seven-year criminal check. |
| CIP-004-3 | R3.2. | The Responsible Entity shall update each personnel risk assessment at least every seven years after the initial personnel risk assessment or for cause. | N/A | The Responsible Entity did not update each personnel risk assessment at least | The Responsible Entity did not update each personnel risk assessment for | The Responsible Entity did not update each personnel risk assessment at least |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | every seven years after the initial personnel risk assessment but did update it for cause when applicable. | cause (when applicable) but did at least updated it every seven years after the initial personnel risk assessment. | every seven years after the initial personnel risk assessment nor was it updated for cause when applicable. |
| CIP-004-3 | R3.3. | The Responsible Entity shall document the results of personnel risk assessments of its personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets, and that personnel risk assessments of contractor and service vendor personnel with such access are conducted pursuant to Standard CIP- 004-3. | The Responsible Entity did not document the results of personnel risk assessments for at least one individual but less than 5% of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | The Responsible Entity did not document the results of personnel risk assessments for 5% or more but less than 10% of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | The Responsible Entity did not document the results of personnel risk assessments for 10% or more but less than 15% of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | The Responsible Entity did not document the results of personnel risk assessments for 15% or more of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. |
| CIP-004-3 | R4. | Access — The Responsible Entity shall maintain list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets. | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | Cyber Assets, missing at least one individual but less than 5% of the authorized personnel. | Cyber Assets, missing 5% or more but less than 10% of the authorized personnel. | Cyber Assets, missing 10% or more but less than 15%of the authorized personnel. | Cyber Assets, missing 15% or more of the authorized personnel. |
| CIP-004-3 | R4.1. | The Responsible Entity shall review the list(s) of its personnel who have such access to Critical Cyber Assets quarterly, and update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, or any change in the access rights of such personnel. The Responsible Entity shall ensure access list(s) for contractors and service vendors are properly maintained. | N/A | The Responsible Entity did not review the list(s) of its personnel who have access to Critical Cyber Assets quarterly. | The Responsible Entity did not update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, nor any change in the access rights of such personnel. | The Responsible Entity did not review the list(s) of all personnel who have access to Critical Cyber Assets quarterly, nor update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, nor any change in the access rights of such personnel. |
| CIP-004-3 | R4.2. | The Responsible Entity shall revoke such access to Critical Cyber Assets within 24 hours for personnel terminated for cause and within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. | N/A | The Responsible Entity did not revoke access within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. | The Responsible Entity did not revoke access to Critical Cyber Assets within 24 hours for personnel terminated for cause. | The Responsible Entity did not revoke access to Critical Cyber Assets within 24 hours for personnel terminated for cause nor within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-005-3 | R1. | Electronic Security Perimeter — The Responsible Entity shall ensure that every Critical Cyber Asset resides within an Electronic Security Perimeter. The Responsible Entity shall identify and document the Electronic Security Perimeter(s) and all access points to the perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not ensure that every Critical Cyber Asset resides within an Electronic Security Perimeter. OR The Responsible Entity did not identify and document the Electronic Security Perimeter(s) and all access points to the perimeter(s). |
| CIP-005-3 | R1.1. | Access points to the Electronic Security Perimeter(s) shall include any externally connected communication end point (for example, dial-up modems) terminating at any device within the Electronic Security Perimeter(s). | N/A | N/A | N/A | Access points to the Electronic Security Perimeter(s) do not include all externally connected communication end point (for example, dial-up modems) terminating at any device within the Electronic Security Perimeter(s). |
| CIP-005-3 | R1.2. | For a dial-up accessible Critical Cyber Asset that uses a non-routable protocol, the Responsible Entity shall define an Electronic Security Perimeter for that single access point at the dial-up device. | N/A | N/A | N/A | For one or more dial-up accessible Critical Cyber Assets that use a non- routable protocol, the Responsible Entity did not define an Electronic |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | Security Perimeter for that single access point at the dial-up device. |
| CIP-005-3 | R1.3. | Communication links connecting discrete Electronic Security Perimeters shall not be considered part of the Electronic Security Perimeter. However, end points of these communication links within the Electronic Security Perimeter(s) shall be considered access points to the Electronic Security Perimeter(s). | N/A | N/A | N/A | At least one end point of a communication link within the Electronic Security Perimeter(s) connecting discrete Electronic Security Perimeters was not considered an access point to the Electronic Security Perimeter. |
| CIP-005-3 | R1.4. | Any non-critical Cyber Asset within a defined Electronic Security Perimeter shall be identified and protected pursuant to the requirements of Standard CIP-005-3. | N/A | N/A | N/A | One or more noncritical Cyber Asset within a defined Electronic Security Perimeter is not identified. OR Is not protected pursuant to the requirements of |
| | | | | | | Standard CIP-005. |
| CIP-005-3 | R1.5. | Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall be afforded the protective measures as a specified in Standard CIP- 003-3; Standard CIP-004-3 | N/A | N/A | N/A | A Cyber Asset used in the access control and/or monitoring of the Electronic Security Perimeter(s) was not afforded one (1) or |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | Requirement R3; Standard CIP-005-3 Requirements R2 and R3; Standard CIP-006-3 Requirement R3; Standard CIP-007-3 Requirements R1 and R3 through R9; Standard CIP-008-3; and Standard CIP-009-3. | | | | more of the protective measures as specified in Standard CIP-003-3; Standard CIP-004-3 Requirement R3; Standard CIP- 005-3 Requirements R2 and R3; Standard CIP-006-3c Requirements R3; Standard CIP-007-3 Requirements R1 and R3 through R9; Standard CIP-008-3; and Standard CIP- 009-3. |
| CIP-005-3 | R1.6. | The Responsible Entity shall maintain documentation of Electronic Security Perimeter(s), all interconnected Critical and non-critical Cyber Assets within the Electronic Security Perimeter(s), all electronic access points to the Electronic Security Perimeter(s) and the Cyber Assets deployed for the access control and monitoring of these access points. | N/A | N/A | N/A | The Responsible Entity did not maintain documentation of one or more of the following: Electronic Security Perimeter(s), interconnected Critical and noncritical Cyber Assets within the Electronic Security Perimeter(s), electronic access points to the Electronic Security Perimeter(s) and Cyber Assets deployed for the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | access control and monitoring of these access points. |
| CIP-005-3 | R2. | Electronic Access Controls — The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not implement or did not document the organizational processes and technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s). |
| CIP-005-3 | R2.1. | These processes and mechanisms shall use an access control model that denies access by default, such that explicit access permissions must be specified. | N/A | N/A | N/A | The processes and mechanisms did not use an access control model that denies access by default, such that explicit access permissions must be specified. |
| CIP-005-3 | R2.2. | At all access points to the Electronic Security Perimeter(s), the Responsible Entity shall enable only ports and services required for operations and for monitoring Cyber Assets within the Electronic Security Perimeter, and shall document, individually or by specified grouping, | N/A | N/A | N/A | At one or more access points to the Electronic Security Perimeter(s), the Responsible Entity enabled ports and services not required for operations and for |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | the configuration of those ports and services. | | | | monitoring Cyber Assets within the Electronic Security Perimeter, or did not document, individually or by specified grouping, the configuration of those ports and services. |
| CIP-005-3 | R2.3. | The Responsible Entity shall implement and maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not implement or maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s) where applicable. |
| CIP-005-3 | R2.4. | Where external interactive access into the Electronic Security Perimeter has been enabled, the Responsible Entity shall implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible. | N/A | N/A | N/A | Where external interactive access into the Electronic Security Perimeter has been enabled the Responsible Entity did not implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible. |
| CIP-005-3 | R2.5. | The required documentation shall, at | N/A | N/A | N/A | The required |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | least, identify and describe: | | | | documentation for R2 did not include one or more of the elements described in R2.5.1 through R2.5.4. |
| CIP-005-3 | R2.5.1. | The processes for access request and authorization. | N/A | N/A | N/A | N/A |
| CIP-005-3 | R2.5.2. | The authentication methods. | N/A | N/A | N/A | N/A |
| CIP-005-3 | R2.5.3. | The review process for authorization rights, in accordance with Standard CIP-004-3 Requirement R4. | N/A | N/A | N/A | N/A |
| CIP-005-3 | R2.5.4. | The controls used to secure dial-up accessible connections. | N/A | N/A | N/A | N/A |
| CIP-005-3 | R2.6. | Appropriate Use Banner — Where technically feasible, electronic access control devices shall display an appropriate use banner on the user screen upon all interactive access attempts. The Responsible Entity shall maintain a document identifying the content of the banner. | The Responsible Entity did not maintain a document identifying the content of the banner. OR Where technically feasible less than 5% electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. | Where technically feasible 5% but less than 10% of electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. | Where technically feasible 10% but less than 15% of electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. | Where technically feasible, 15% or more electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. |
| CIP-005-3 | R3. | Monitoring Electronic Access — The Responsible Entity shall implement | N/A | N/A | N/A | The Responsible Entity did not |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | and document an electronic or manual process(es) for monitoring and logging access at access points to the Electronic Security Perimeter(s) twenty-four hours a day, seven days a week. | | | | implement or did not document electronic or manual processes monitoring and logging access points. |
| CIP-005-3 | R3.1. | For dial-up accessible Critical Cyber Assets that use non-routable protocols, the Responsible Entity shall implement and document monitoring process(es) at each access point to the dial-up device, where technically feasible. | N/A | N/A | N/A | Where technically feasible, the Responsible Entity did not implement or did not document electronic or manual processes for monitoring at one or more access points to dial-up devices. |
| CIP-005-3 | R3.2. | Where technically feasible, the security monitoring process(es) shall detect and alert for attempts at or actual unauthorized accesses. These alerts shall provide for appropriate notification to designated response personnel. Where alerting is not technically feasible, the Responsible Entity shall review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. | N/A | N/A | N/A | Where technically feasible, the Responsible Entity did not implement security monitoring process(es) to detect and alert for attempts at or actual unauthorized accesses. OR The above alerts do not provide for appropriate notification to designated response personnel. OR |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | Where alerting is not technically feasible, the Responsible Entity did not review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. |
| CIP-005-3 | R4. | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of the electronic access points to the Electronic Security Perimeter(s) at least annually. The vulnerability assessment shall include, at a minimum, the following: | N/A | N/A | N/A | The Responsible Entity did not perform a Vulnerability Assessment at least annually for one or more of the access points to the Electronic Security Perimeter(s). OR The vulnerability assessment did not include one (1) or more of the subrequirements R4.1, R4.2, R4.3, R4.4, R4.5. |
| CIP-005-3 | R4.1. | A document identifying the vulnerability assessment process; | N/A | N/A | N/A | N/A |
| CIP-005-3 | R4.2. | A review to verify that only ports and services required for operations at these access | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | points are enabled; | | | | |
| CIP-005-3 | R4.3. | The discovery of all access points to the Electronic Security Perimeter; | N/A | N/A | N/A | N/A |
| CIP-005-3 | R4.4. | A review of controls for default accounts, passwords, and network management community strings; | N/A | N/A | N/A | N/A |
| CIP-005-3 | R4.5. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | N/A | N/A | N/A | N/A |
| CIP-005-3 | R5. | Documentation Review and Maintenance — The Responsible Entity shall review, update, and maintain all documentation to support compliance with the requirements of Standard CIP-005-3. | The Responsible Entity did not review, update, and maintain at least one but less than or equal to 5% of the documentation to support compliance with the requirements of Standard CIP-005. | The Responsible Entity did not review, update, and maintain greater than 5% but less than or equal to 10% of the documentation to support compliance with the requirements of Standard CIP-005. | The Responsible Entity did not review, update, and maintain greater than 10% but less than or equal to 15% of the documentation to support compliance with the requirements of Standard CIP-005. | The Responsible Entity did not review, update, and maintain greater than 15% of the documentation to support compliance with the requirements of Standard CIP-005. |
| CIP-005-3 | R5.1. | The Responsible Entity shall ensure that all documentation required by Standard CIP-005-2 reflect current configurations and processes and shall review the documents and procedures referenced in Standard CIP-005-3 at least annually. | N/A | The Responsible Entity did not provide evidence of an annual review of the documents and procedures referenced in Standard CIP-005. | The Responsible Entity did not document current configurations and processes referenced in Standard CIP-005. | The Responsible Entity did not document current configurations and processes and did not review the documents and procedures referenced in Standard CIP-005 at least annually. |
| CIP-005-3 | R5.2. | The Responsible Entity shall update | N/A | N/A | N/A | The Responsible |

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| | | the documentation to reflect the modification of the network or controls within ninety calendar days of the change. | | | | Entity did not update documentation to reflect a modification of the network or controls within ninety calendar days of the change. |
| CIP-005-3 | R5.3. | The Responsible Entity shall retain electronic access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-3. | The Responsible Entity retained electronic access logs for 75 or more calendar days, but for less than 90 calendar days. | The Responsible Entity retained electronic access logs for 60 or more calendar days, but for less than 75 calendar days. | The Responsible Entity retained electronic access logs for 45 or more calendar days , but for less than 60 calendar days. | The Responsible Entity retained electronic access logs for less than 45 calendar days. |
| CIP-006-3a | R1. | Physical Security Plan — The Responsible Entity shall document, implement, and maintain a physical security plan, approved by the senior manager or delegate(s) that shall address, at a minimum, the following: | N/A | N/A | The Responsible Entity created a physical security plan but did not gain approval by a senior manager or delegate(s). OR The Responsible Entity created and implemented but did not maintain a physical security plan. | The Responsible Entity did not document, implement, and maintain a physical security plan. |
| CIP-006-3a | R1.1. | All Cyber Assets within an Electronic Security Perimeter shall reside within an identified Physical Security | N/A | N/A | N/A | The Responsible Entity's physical security plan does |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | Perimeter. Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity shall deploy and document alternative measures to control physical access to such Cyber Assets. | | | | not include processes to ensure and document that all Cyber Assets within an Electronic Security Perimeter also reside within an identified Physical Security Perimeter. OR Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity has not deployed or documented alternative measures to control physical access to such Cyber Assets within the Electronic Security Perimeter. |
| CIP-006-3a | R1.2. | Identification of all physical access points through each Physical Security Perimeter and measures to control entry at those access points. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not identify all access points through each Physical Security Perimeter or does not identify measures to control entry at those |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | access points. |
| CIP-006-3a | R1.3 | Processes, tools, and procedures to monitor physical access to the perimeter(s). | N/A | N/A | N/A | The Responsible Entity's physical security plan does not include processes, tools, and procedures to monitor physical access to the perimeter(s). |
| CIP-006-3a | R1.4 | Appropriate use of physical access controls as described in Requirement R4 including visitor pass management, response to loss, and prohibition of inappropriate use of physical access controls. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not address the appropriate use of physical access controls as described in Requirement R4. |
| CIP-006-3a | R1.5 | Review of access authorization requests and revocation of access authorization, in accordance with CIP-004-3 Requirement R4. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not address the review of access authorization requests or the revocation of access authorization, in accordance with CIP-004-3 Requirement R4. |
| CIP-006-3a | R1.6 | A visitor control program for visitors (personnel without authorized unescorted access to a Physical Security Perimeter), containing at a minimum the following: | N/A | N/A | N/A | The Responsible Entity did not include or implement a visitor control program in |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | its physical security plan or it does not meet the requirements of continuous escort. |
| CIP-006-3a | R1.6.1 | Logs (manual or automated) to document the entry and exit of visitors, including the date and time, to and from Physical Security Perimeters. | N/A | N/A | N/A | N/A |
| CIP-006-3a | R1.6.2 | Continuous escorted access of visitors within the Physical Security Perimeter | N/A | N/A | N/A | N/A |
| CIP-006-3a | R1.7 | Update of the physical security plan within thirty calendar days of the completion of any physical security system redesign or reconfiguration, including, but not limited to, addition or removal of access points through the Physical Security Perimeter, physical access controls, monitoring controls, or logging controls. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not address r updating the physical security plan within-thirty calendar days of the completion of a physical security system redesign or within thirty calendar days of the completion of a reconfiguration. |
| | | | | | | OR |
| | | | | | | The plan was not updated within thirty calendar days of the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | completion of a physical security system redesign or reconfiguration |
| CIP-006-3a | R1.8 | Annual review of the physical security plan. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not address a process for ensuring that the physical security plan is reviewed at least annually. |
| CIP-006-3a | R2 | Protection of Physical Access Control Systems — Cyber Assets that authorize and/or log access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers, shall: | N/A | N/A | N/A | A Cyber Asset that authorizes and/or logs access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers, was not protected from unauthorized physical access. OR A Cyber Asset that authorizes and/or logs access to the Physical Security |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers was not afforded the protective measures specified in Standard CIP-003-3; Standard CIP-004-3 Requirement R3; Standard CIP- 005-3 Requirements R2 and R3; Standard CIP-006-3a Requirements R4 and R5; Standard CIP-007-3; Standard CIP-008-3; and Standard CIP-009-3. |
| CIP-006-3a | R2.1. | Be protected from unauthorized physical access. | N/A | N/A | N/A | N/A |
| CIP-006-3a | R2.2. | Be afforded the protective measures specified in Standard CIP-003-3; Standard CIP-004-3 Requirement R3; Standard CIP-005-3 Requirements R2 and R3; Standard CIP-006-3a Requirements R4 and R5; Standard CIP-007-3; Standard CIP-008-3; and Standard CIP-009-3. | N/A | N/A | N/A | N/A |
| CIP-006-3a | R3 | Protection of Electronic Access | N/A | N/A | N/A | A Cyber Assets used |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | Control Systems — Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall reside within an identified Physical Security Perimeter. | | | | in the access control and/or monitoring of the Electronic Security Perimeter(s) does not reside within an identified Physical Security Perimeter. |
| CIP-006-3a | R4 | Physical Access Controls — The Responsible Entity shall document and implement the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. The Responsible Entity shall implement one or more of the following physical access methods: Card Key: A means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from one perimeter to another. Special Locks: These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. Security Personnel: Personnel responsible for controlling physical access who may reside on-site or | N/A | N/A | N/A | The Responsible Entity has not documented or has not implemented the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty- four hours a day, seven days a week using one or more of the following physical access methods: • Card Key: A means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from one perimeter to another. • Special Locks: |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | at a monitoring station. Other Authentication Devices: Biometric, keypad, token, or other equivalent devices that control physical access to the Critical Cyber Assets | | | | These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. • Security Personnel: Personnel responsible for controlling physical access who may reside on-site or at a monitoring station. • Other Authentication Devices: Biometric, keypad, token, or other equivalent devices that control physical access to the Critical Cyber Assets. |
| CIP-006-3a | R5 | Monitoring Physical Access — The Responsible Entity shall document and implement the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. Unauthorized access attempts shall be reviewed immediately and handled in accordance with the procedures | N/A | N/A. | N/A | The Responsible Entity has not documented or has not implemented the technical and procedural controls for monitoring physical access at all access points to the Physical Security |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | specified in Requirement CIP-008-3. | | | | Perimeter(s) |
| | | One or more of the following | | | | twenty-four hours a |
| | | monitoring methods shall be used: | | | | day, seven |
| | | | | | | days a week using |
| | | Alarm Systems: Systems that | | | | one or more of |
| | | alarm to indicate a door, | | | | the following |
| | | gate or window has been | | | | monitoring |
| | | opened without | | | | methods: |
| | | authorization. These alarms | | | | Alarm Systems: |
| | | must provide for immediate | | | | Systems that alarm to indicate a |
| | | notification to personnel | | | | door, gate or |
| | | responsible for response. | | | | window has been |
| | | Human Observation of | | | | opened without |
| | | Human Observation of Access Points: Monitoring of | | | | authorization. These |
| | | physical access points by | | | | alarms must provide |
| | | authorized personnel as | | | | for immediate |
| | | specified in Requirement R4. | | | | notification to |
| | | specifica în requirement re- | | | | personnel |
| | | | | | | responsible for |
| | | | | | | response. |
| | | | | | | • Human |
| | | | | | | Observation of |
| | | | | | | Access Points: |
| | | | | | | Monitoring of |
| | | | | | | physical access |
| | | | | | | points by authorized |
| | | | | | | personnel as |
| | | | | | | specified in |
| | | | | | | Requirement R4. |
| | | | | | | OR |
| | | | | | | |
| | | | | | | An unauthorized |
| | | | | | | access attempt |
| | | | | | | was not reviewed |
| | | | | | | immediately and |

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| | | | | | | handled in accordance with CIP- 008-3. |
| CIP-006-3a | R6 | Logging Physical Access — Logging shall record sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. The Responsible Entity shall implement and document the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method. Video Recording: Electronic capture of video images of sufficient quality to determine identity. Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4 | | N/A | N/A | The Responsible Entity has not implemented or has not documented the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: • Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method, • Video Recording: Electronic capture of video images of sufficient quality to determine identity, or • Manual Logging: A log book or sign-in sheet, or other |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4. |
| | | | | | | OR |
| CIP-006-3a | R7 | Access Log Retention — The | N/A | N/A | N/A | The Responsible Entity has not recorded sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. The responsible |
| CIP-006-3a | K7 | responsible entity shall retain physical access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-3. | | N/A | N/A | entity did not retain physical access logs for at least ninety calendar days. |
| CIP-006-3a | R8 | Maintenance and Testing — The Responsible Entity shall implement a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly. The program must include, at a | N/A | N/A | N/A | The Responsible Entity has not implemented a maintenance and testing program to ensure that all physical security |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | minimum, the following: | | | | systems under Requirements R4, R5, and R6 function properly. |
| | | | | | | OR |
| | | | | | | The implemented program does not include one or more of the requirements; R8.1, R8.2, and R8.3. |
| CIP-006-3a | R8.1 | Testing and maintenance of all physical security mechanisms on a cycle no longer than three years. | N/A | N/A | N/A | N/A |
| CIP-006-3a | R8.2 | Retention of testing and maintenance records for the cycle determined by the Responsible Entity in Requirement R8.1. | N/A | N/A | N/A | N/A |
| CIP-006-3a | R8.3 | Retention of outage records regarding access controls, logging, and monitoring for a minimum of one calendar year. | N/A | N/A | N/A | N/A |
| CIP-007-3 | R1. | Test Procedures — The Responsible Entity shall ensure that new Cyber Assets and significant changes to existing Cyber Assets within the Electronic Security Perimeter do not adversely affect existing cyber security controls. For purposes of Standard CIP-007-3, a significant change shall, at a minimum, include implementation of security patches, cumulative service packs, vendor releases, and version upgrades of | N/A | N/A | N/A | The Responsible Entity did not ensure the prevention of adverse affects described in R1, by not including the required minimum significant changes. OR The Responsible Entity did not |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | operating systems, applications, database platforms, or other third- party software or firmware. | | | | address one or more of the following: R1.1, R1.2, R1.3. |
| CIP-007-3 | R1.1. | The Responsible Entity shall create, implement, and maintain cyber security test procedures in a manner that minimizes adverse effects on the production system or its operation. | N/A | N/A | N/A | N/A |
| CIP-007-3 | R1.2. | The Responsible Entity shall document that testing is performed in a manner that reflects the production environment. | N/A | N/A | N/A | N/A |
| CIP-007-3 | R1.3. | The Responsible Entity shall document test results. | N/A | N/A | N/A | N/A |
| CIP-007-3 | R2. | Ports and Services — The Responsible Entity shall establish, document and implement a process to ensure that only those ports and services required for normal and emergency operations are enabled. | N/A | N/A | N/A | The Responsible Entity did not establish (implement) or did not document a process to ensure that only those ports and services required for normal and emergency operations are enabled. |
| CIP-007-3 | R2.1. | The Responsible Entity shall enable only those ports and services required for normal and emergency operations. | N/A | N/A | N/A | The Responsible Entity enabled one or more ports or services not required for normal and emergency operations on Cyber Assets inside the Electronic Security |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | Perimeter(s). |
| CIP-007-3 | R2.2. | The Responsible Entity shall disable other ports and services, including those used for testing purposes, prior to production use of all Cyber Assets inside the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not disable one or more other ports or services, including those used for testing purposes, prior to production use for Cyber Assets inside the Electronic Security Perimeter(s). |
| CIP-007-3 | R2.3. | In the case where unused ports and services cannot be disabled due to technical limitations, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | N/A | N/A | N/A | For cases where unused ports and services cannot be disabled due to technical limitations, the Responsible Entity did not document compensating measure(s) applied to mitigate risk. |
| CIP-007-3 | R3. | Security Patch Management — The Responsible Entity, either separately or as a component of the documented configuration management process specified in CIP-003-3 Requirement R6, shall establish, document and implement a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic | N/A | N/A | N/A | The Responsible Entity did not establish (implement) or did not document , either separately or as a component of the documented configuration management process specified in CIP-003-3 |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | Security Perimeter(s). | | | | Requirement R6, a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). |
| CIP-007-3 | R3.1. | The Responsible Entity shall document the assessment of security patches and security upgrades for applicability within thirty calendar days of availability of the patches or upgrades. | N/A | N/A | N/A | The Responsible Entity did not document the assessment of security patches and security upgrades for applicability as required in Requirement R3 within 30 calendar days after the availability of the patches and upgrades. |
| CIP-007-3 | R3.2. | The Responsible Entity shall document the implementation of security patches. In any case where the patch is not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | N/A | N/A | N/A | The Responsible Entity did not document the implementation of applicable security patches as required in R3. OR Where an applicable |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | patch was not installed, the Responsible Entity did not document the compensating measure(s) applied to mitigate risk. |
| CIP-007-3 | R4. | Malicious Software Prevention — The Responsible Entity shall use anti- virus software and other malicious software ("malware") prevention tools, where technically feasible, to detect, prevent, deter, and mitigate the introduction, exposure, and propagation of malware on all Cyber Assets within the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity, where technically feasible, did not use anti- virus software or other malicious software ("malware") prevention tools, on <u>one</u> or more Cyber Assets within the Electronic Security Perimeter(s). |
| CIP-007-3 | R4.1. | The Responsible Entity shall document and implement anti-virus and malware prevention tools. In the case where anti-virus software and malware prevention tools are not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | N/A | N/A | N/A | The Responsible Entity did not document the implementation of antivirus and malware prevention tools for cyber assets within the electronic security perimeter. OR The Responsible Entity did not document the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | implementation of compensating measure(s) applied to mitigate risk exposure where antivirus and malware prevention tools are not installed. |
| CIP-007-3 | R4.2. | The Responsible Entity shall document and implement a process for the update of anti-virus and malware prevention "signatures." The process must address testing and installing the signatures. | N/A | N/A | N/A | The Responsible Entity did not document or did not implement a process including addressing testing and installing the signatures for the update of anti-virus and malware prevention "signatures." |
| CIP-007-3 | R5. | Account Management — The Responsible Entity shall establish, implement, and document technical and procedural controls that enforce access authentication of, and accountability for, all user activity, and that minimize the risk of unauthorized system access. | N/A | N/A | N/A | The Responsible Entity did not document or did not implement technical and procedural controls that enforce access authentication of, and accountability for, all user activity. |
| CIP-007-3 | R5.1. | The Responsible Entity shall ensure that individual and shared system accounts and authorized access permissions are consistent with the concept of "need to know" with | N/A | N/A | N/A | The Responsible Entity did not ensure that individual and shared system accounts and |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | respect to work functions performed. | | | | authorized access permissions are consistent with the concept of "need to know" with respect to work functions performed. |
| CIP-007-3 | R5.1.1. | The Responsible Entity shall ensure that user accounts are implemented as approved by designated personnel. Refer to Standard CIP- 003-3 Requirement R5. | N/A | N/A | N/A | One or more user accounts implemented by the Responsible Entity were not implemented as approved by designated personnel. |
| CIP-007-3 | R5.1.2. | The Responsible Entity shall establish methods, processes, and procedures that generate logs of sufficient detail to create historical audit trails of individual user account access activity for a minimum of ninety days. | N/A | The Responsible Entity generated logs with sufficient detail to create historical audit trails of individual user account access activity, however the logs do not contain activity for a minimum of 90 days. | The Responsible Entity generated logs with insufficient detail to create historical audit trails of individual user account access activity. | The Responsible Entity did not generate logs of individual user account access activity. |
| CIP-007-3 | R5.1.3. | The Responsible Entity shall review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003-3 Requirement R5 and Standard CIP- 004-3 Requirement R4. | N/A | N/A | N/A | The Responsible Entity did not review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003-3 |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | Requirement R5 and Standard CIP-004-3 Requirement R4. |
| CIP-007-3 | R5.2. | The Responsible Entity shall implement a policy to minimize and manage the scope and acceptable use of administrator, shared, and other generic account privileges including factory default accounts. | N/A | N/A | N/A | The Responsible Entity did not implement a policy to minimize and manage the scope and acceptable use of administrator, shared, and other generic account privileges including factory default accounts. |
| CIP-007-3 | R5.2.1. | The policy shall include the removal, disabling, or renaming of such accounts where possible. For such accounts that must remain enabled, passwords shall be changed prior to putting any system into service. | N/A | N/A | The Responsible Entity's policy did not include the removal, disabling, or renaming of such accounts where possible, however for accounts that must remain enabled, passwords were changed prior to putting any system into service. | For accounts that must remain enabled, the Responsible Entity did not change passwords prior to putting any system into service. |
| CIP-007-3 | R5.2.2. | The Responsible Entity shall identify those individuals with access to shared accounts. | N/A | N/A | N/A | The Responsible Entity did not identify all individuals with access to shared accounts. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-007-3 | R5.2.3. | Where such accounts must be shared, the Responsible Entity shall have a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps for securing the account in the event of personnel changes (for example, change in assignment or termination). | N/A | N/A | N/A | Where such accounts must be shared, the Responsible Entity has not implemented (one or more components of) a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps for securing the account in the event of personnel changes (for example, change in assignment or termination). |
| CIP-007-3 | R5.3. | At a minimum, the Responsible Entity shall require and use passwords, subject to the following, as technically feasible: | N/A | N/A | N/A | The Responsible Entity does not require passwords subject to R5.3.1, R5.3.2, R5.3.3. OR Does not use passwords subject to R5.3.1, R5.3.2, R5.3.3. |
| CIP-007-3 | R5.3.1. | Each password shall be a minimum | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | of six characters. | | | | |
| CIP-007-3 | R5.3.2. | Each password shall consist of a combination of alpha, numeric, and "special" characters. | N/A | N/A | N/A | N/A |
| CIP-007-3 | R5.3.3. | Each password shall be changed at least annually, or more frequently based on risk. | N/A | N/A | N/A | N/A |
| CIP-007-3 | R6. | Security Status Monitoring — The Responsible Entity shall ensure that all Cyber Assets within the Electronic Security Perimeter, as technically feasible, implement automated tools or organizational process controls to monitor system events that are related to cyber security. | N/A | N/A | N/A | The Responsible Entity as technically feasible, did not implement automated tools or organizational process controls, to monitor system events that are related to cyber security on one or more of Cyber Assets inside the Electronic Security Perimeter(s). |
| CIP-007-3 | R6.1. | The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-007-3 | R6.2. | The security monitoring controls shall issue automated or manual alerts for detected Cyber Security Incidents. | N/A | N/A | N/A | The Responsible entity's security monitoring controls do not issue automated or manual alerts for detected Cyber Security Incidents. |
| CIP-007-3 | R6.3. | The Responsible Entity shall maintain logs of system events related to cyber security, where technically feasible, to support incident response as required in Standard CIP-008-3. | N/A | N/A | N/A | The Responsible Entity did not maintain logs of system events related to cyber security, where technically feasible, to support incident response as required in Standard CIP-008. |
| CIP-007-3 | R6.4. | The Responsible Entity shall retain all logs specified in Requirement R6 for ninety calendar days. | N/A | N/A | N/A | The Responsible Entity did not retain one or more of the logs specified in Requirement R6 for at least 90 calendar days. |
| CIP-007-3 | R6.5. | The Responsible Entity shall review logs of system events related to cyber security and maintain records documenting review of logs. | N/A | N/A | N/A | The Responsible Entity did not review logs of system events related to cyber security nor maintain records documenting review of logs. |
| CIP-007-3 | R7. | Disposal or Redeployment — The | N/A | N/A | The Responsible | The Responsible |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | Responsible Entity shall establish and implement formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-3. | | | Entity established and implemented formal methods, processes, and procedures for redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005- 3 but did not address redeployment as specified in R7.2. | Entity did not establish or implement formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-3. OR The Responsible Entity established formal methods, processes, and procedures for redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-2 but did not address disposal as specified in R7.1. OR |
| | | | | | | The Responsible |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | Entity did not maintain records pertaining to disposal or[³] redeployment as specified in R7.3. |
| CIP-007-3 | R7.1. | Prior to the disposal of such assets, the Responsible Entity shall destroy or erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | N/A | N/A | N/A | N/A |
| CIP-007-3 | R7.2. | Prior to redeployment of such assets, the Responsible Entity shall, at a minimum, erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | N/A | N/A | N/A | N/A |
| CIP-007-3 | R7.3. | The Responsible Entity shall maintain records that such assets were disposed of or redeployed in accordance with documented procedures. | N/A | N/A | N/A | N/A |
| CIP-007-3 | R8 | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of all Cyber Assets within the Electronic Security Perimeter at least annually. The vulnerability assessment shall include, at a minimum, the following: | N/A | N/A | N/A | The Responsible Entity did not perform a Vulnerability Assessment on one or more Cyber Assets within the Electronic Security Perimeter at least |

³ Please note that FERC's January 20, 2011 Order on Version 2 And Version 3 Violation Risk Factors And Violation Severity Levels For Critical Infrastructure Protection Reliability Standards dictated that this should read "…records pertaining to disposal **of** redeployment as specified in R7.3." (Emphasis added) It has come to NERC's attention that it should read "…records pertaining to disposal **or** redeployment as specified in R7.3." (Emphasis added) and NERC has made this change accordingly. NERC proposes to remove this footnote from the final approved list of VSLs.

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | annually. OR The vulnerability assessment did not include one (1) or more of the subrequirements 8.1, 8.2, 8.3, 8.4. |
| CIP-007-3 | R8.1. | A document identifying the vulnerability assessment process; | N/A | N/A | N/A | N/A |
| CIP-007-3 | R8.2. | A review to verify that only ports and services required for operation of the Cyber Assets within the Electronic Security Perimeter are enabled; | N/A | N/A | N/A | N/A |
| CIP-007-3 | R8.3. | A review of controls for default accounts; and, | N/A | N/A | N/A | N/A |
| CIP-007-3 | R8.4. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | N/A | N/A | N/A | N/A |
| CIP-007-3 | R9 | Documentation Review and Maintenance — The Responsible Entity shall review and update the documentation specified in Standard CIP-007-3 at least annually. Changes resulting from modifications to the systems or controls shall be documented within thirty calendar days of the change being completed. | N/A | N/A | The Responsible Entity did not review and update the documentation specified in Standard CIP-007-3 at least annually. OR The Responsible Entity did not document changes | The Responsible Entity did not review and update the documentation specified in Standard CIP-007-3 at least annually and changes resulting from modifications to the systems or controls were not documented within |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | resulting from modifications to the systems or controls within thirty calendar days of the change being completed. | thirty calendar days of the change being completed. |
| CIP-008-3 | R1. | Cyber Security Incident Response Plan — The Responsible Entity shall develop and maintain a Cyber Security Incident response plan and implement the plan in response to Cyber Security Incidents. The Cyber Security Incident response plan shall address, at a minimum, the following: | N/A | N/A | The Responsible Entity has developed a Cyber Security Incident response plan that addresses all of the components required by R1.1 through R1.6 but has not maintained the plan in accordance with those components. | The Responsible Entity has not developed a Cyber Security Incident response plan that addresses all of the components required by R1.1 through R1.6, or has not implemented the plan in response to a Cyber Security Incident. |
| CIP-008-3 | R1.1. | Procedures to characterize and classify events as reportable Cyber Security Incidents. | N/A | N/A | N/A | N/A |
| CIP-008-3 | R1.2. | Response actions, including roles and responsibilities of Cyber Security Incident response teams, Cyber Security Incident handling procedures, and communication plans. | N/A | N/A | N/A | N/A |
| CIP-008-3 | R1.3. | Process for reporting Cyber Security Incidents to the Electricity Sector Information Sharing and Analysis Center (ES- ISAC). The Responsible Entity must ensure that all reportable Cyber Security Incidents are reported to | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | the ES-ISAC either directly or through an intermediary. | | | | |
| CIP-008-3 | R1.4. | Process for updating the Cyber Security Incident response plan within thirty calendar days of any changes. | N/A | N/A | N/A | N/A |
| CIP-008-3 | R1.5. | Process for ensuring that the Cyber Security Incident response plan is reviewed at least annually. | N/A | N/A | N/A | N/A |
| CIP-008-3 | R1.6. | Process for ensuring the Cyber Security Incident response plan is tested at least annually. A test of the Cyber Security Incident response plan can range from a paper drill, to a full operational exercise, to the response to an actual incident. | N/A | N/A | N/A | N/A |
| CIP-008-3 | R2 | Cyber Security Incident Documentation — The Responsible Entity shall keep relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 for three calendar years. | N/A | N/A | N/A | The Responsible Entity has not kept relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 for at least three calendar years. |
| CIP-009-3 | R1 | Recovery Plans — The Responsible Entity shall create and annually review recovery plan(s) for Critical Cyber Assets. The recovery plan(s) shall address at a minimum the following: | N/A | N/A | N/A | The Responsible Entity has not created or has not annually reviewed their recovery plan(s) for Critical Cyber Assets OR has created a plan but did not address |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | one or more of the requirements CIP- 009-1 R1.1 and R1.2. |
| CIP-009-3 | R1.1. | Specify the required actions in response to events or conditions of varying duration and severity that would activate the recovery plan(s). | N/A | N/A | N/A | N/A |
| CIP-009-3 | R1.2. | Define the roles and responsibilities of responders. | N/A | N/A | N/A | N/A |
| CIP-009-3 | R2 | Exercises — The recovery plan(s) shall be exercised at least annually. An exercise of the recovery plan(s) can range from a paper drill, to a full operational exercise, to recovery from an actual incident. | N/A | N/A | N/A | The Responsible Entity's recovery plan(s) have not been exercised at least annually. |
| CIP-009-3 | R3 | Change Control — Recovery plan(s) shall be updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. Updates shall be communicated to personnel responsible for the activation and implementation of the recovery plan(s) within thirty calendar days of the change being completed. | N/A | N/A | N/A | The Responsible Entity's recovery plan(s) have not been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. |
| | | | | | | OR |
| | | | | | | The Responsible Entity's recovery plan(s) have been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | an actual incident but the updates were not communicated to personnel responsible for the activation and implementation of the recovery plan(s) within thirty calendar days of the change. |
| CIP-009-3 | R4 | Backup and Restore — The recovery plan(s) shall include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. For example, backups may include spare electronic components or equipment, written documentation of configuration settings, tape backup, etc. | N/A | N/A | N/A | The Responsible Entity's recovery plan(s) do not include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. |
| CIP-009-3 | R5 | Testing Backup Media — Information essential to recovery that is stored on backup media shall be tested at least annually to ensure that the information is available. Testing can be completed off site. | N/A | N/A | N/A | The Responsible Entity's information essential to recovery that is stored on backup media has not been tested at least annually to ensure that the information is available. |

| Standard | Requirement | Text of Requirement | VRF |
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| Number | Number | | |
| CIP-002-3 | R1. | Critical Asset Identification Method — The Responsible Entity shall identify and | MEDIUM |
| | | document a risk-based assessment methodology to use to identify its Critical Assets. | |
| CIP-002-3 | R1.1 | The Responsible Entity shall maintain documentation describing its risk-based | LOWER |
| | | assessment methodology that includes procedures and evaluation criteria. | |
| CIP-002-3 | R1.2 | The risk-based assessment shall consider the following assets: | MEDIUM |
| CIP-002-3 | R1.2.1. | Control centers and backup control centers performing the functions of the entities | LOWER |
| | | listed in the Applicability section of this standard. | |
| CIP-002-3 | R1.2.2. | Transmission substations that support the reliable operation of the Bulk Electric System. | LOWER |
| CIP-002-3 | R1.2.3. | Generation resources that support the reliable operation of the Bulk Electric System. | LOWER |
| | | | |
| CIP-002-3 | R1.2.4. | Systems and facilities critical to system restoration, including blackstart generators and | LOWER |
| | | substations in the electrical path of transmission lines used for initial system restoration. Systems and facilities critical to automatic load shedding under a common control | LOWER |
| CIP-002-3 | R1.2.5. | system capable of shedding 300 MW or more. | LOWER |
| | | | LOWER |
| CIP-002-3 | R1.2.6. | Special Protection Systems that support the reliable operation of the Bulk Electric System. | LOWER |
| | | Any additional assets that support the reliable operation of the Bulk Electric | LOWER |
| CIP-002-3 | R1.2.7. | System that the Responsible Entity deems appropriate to include in its assessment. | LOWER |
| | | Critical Asset Identification — The Responsible Entity shall develop a list of its identified | HIGH |
| CIP-002-3 | R2. | Critical Assets determined through an annual application of the risk-based assessment | mon |
| | | methodology required in R1. The Responsible Entity shall review this list at least | |
| | | annually, and update it as necessary. | |
| CIP-002-3 | R3. | Critical Cyber Asset Identification — Using the list of Critical Assets developed pursuant | HIGH |
| CIP-002-3 | кэ. | to Requirement R2, the Responsible Entity shall develop a list of associated Critical Cyber | |
| | | Assets essential to the operation of the Critical Asset. Examples at control centers and | |
| | | backup control centers include systems and facilities at master and remote sites that | |
| | | provide monitoring and control, automatic generation control, real-time power system | |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| | | modeling, and real-time inter-utility data exchange. The Responsible Entity shall review this list at least annually, and update it as necessary. For the purpose of Standard CIP- 002-3, Critical Cyber Assets are further qualified to be those having at least one of the following characteristics: | |
| CIP-002-3 | R3.1 | The Cyber Asset uses a routable protocol to communicate outside the Electronic Security Perimeter; or, | LOWER |
| CIP-002-3 | R3.2. | The Cyber Asset uses a routable protocol within a control center; or, | LOWER |
| CIP-002-3 | R3.3. | The Cyber Asset is dial-up accessible. | LOWER |
| CIP-002-3 | R4. | Annual Approval — The senior manager or delegate(s) shall approve annually the risk- based assessment methodology, the list of Critical Assets and the list of Critical Cyber Assets. Based on Requirements R1, R2, and R3 the Responsible Entity may determine that it has no Critical Assets or Critical Cyber Assets. The Responsible Entity shall keep a signed and dated record of the senior manager or delegate(s)'s approval of the risk- based assessment methodology, the list of Critical Assets and the list of Critical Cyber Assets (even if such lists are null.) | LOWER |
| CIP-003-3 | R1. | Cyber Security Policy — The Responsible Entity shall document and implement a cyber security policy that represents management's commitment and ability to secure its Critical Cyber Assets. The Responsible Entity shall, at minimum, ensure the following: | MEDIUM |
| CIP-003-3 | R1.1. | The cyber security policy addresses the requirements in Standards CIP-002-3 through CIP-009-3, including provision for emergency situations. | LOWER |
| CIP-003-3 | R1.2. | The cyber security policy is readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets. | LOWER |
| CIP-003-3 | R1.3 | Annual review and approval of the cyber security policy by the senior manager assigned pursuant to R2. | LOWER |
| CIP-003-3 | R2. | Leadership — The Responsible Entity shall assign a senior manager with overall responsibility for leading and managing the entity's implementation of, and adherence to, Standards CIP-002-3 through CIP-009-3. | MEDIUM |
| CIP-003-3 | R2.1. | The senior manager shall be identified by name, title, and date of designation. | LOWER |
| CIP-003-3 | R2.2. | Changes to the senior manager must be documented within thirty calendar days of the effective date. | LOWER |
| CIP-003-3 | R2.3. | Where allowed by Standards CIP-002-3 through CIP-009-3, the senior manager may delegate authority for specific actions to a named delegate or delegates. These delegations shall be documented in the same manner as R2.1 and R2.2, and approved by the senior manager. | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-003-3 | R2.4 | The senior manager or delegate(s), shall authorize and document any exception from the requirements of the cyber security policy. | LOWER |
| CIP-003-3 | R3. | Exceptions — Instances where the Responsible Entity cannot conform to its cyber security policy must be documented as exceptions and authorized by the senior manager or delegate(s). | LOWER |
| CIP-003-3 | R3.1. | Exceptions to the Responsible Entity's cyber security policy must be documented within thirty days of being approved by the senior manager or delegate(s). | LOWER |
| CIP-003-3 | R3.2. | Documented exceptions to the cyber security policy must include an explanation as to why the exception is necessary and any compensating measures. | LOWER |
| CIP-003-3 | R3.3. | Authorized exceptions to the cyber security policy must be reviewed and approved annually by the senior manager or delegate(s) to ensure the exceptions are still required and valid. Such review and approval shall be documented. | LOWER |
| CIP-003-3 | R4. | Information Protection — The Responsible Entity shall implement and document a program to identify, classify, and protect information associated with Critical Cyber Assets. | MEDIUM |
| CIP-003-3 | R4.1. | The Critical Cyber Asset information to be protected shall include, at a minimum and regardless of media type, operational procedures, lists as required in Standard CIP-002-3, network topology or similar diagrams, floor plans of computing centers that contain Critical Cyber Assets, equipment layouts of Critical Cyber Assets, disaster recovery plans, incident response plans, and security configuration information. | MEDIUM |
| CIP-003-3 | R4.2. | The Responsible Entity shall classify information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. | LOWER |
| CIP-003-3 | R4.3. | The Responsible Entity shall, at least annually, assess adherence to its Critical Cyber Asset information protection program, document the assessment results, and implement an action plan to remediate deficiencies identified during the assessment. | LOWER |
| CIP-003-3 | R5. | Access Control — The Responsible Entity shall document and implement a program for managing access to protected Critical Cyber Asset information. | LOWER |
| CIP-003-3 | R5.1. | The Responsible Entity shall maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information. | LOWER |
| CIP-003-3 | R5.1.1. | Personnel shall be identified by name, title, and the information for which they are responsible for authorizing access. | LOWER |
| CIP-003-3 | R5.1.2. | The list of personnel responsible for authorizing access to protected information shall be verified at least annually. | LOWER |
| CIP-003-3 | R5.2. | The Responsible Entity shall review at least annually the access privileges to protected information to confirm that access privileges are correct and that they correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities. | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-003-3 | R5.3. | The Responsible Entity shall assess and document at least annually the processes for controlling access privileges to protected information. | LOWER |
| CIP-003-3 | R6. | Change Control and Configuration Management — The Responsible Entity shall establish and document a process of change control and configuration management for adding, modifying, replacing, or removing Critical Cyber Asset hardware or software, and implement supporting configuration management activities to identify, control and document all entity or vendor related changes to hardware and software components of Critical Cyber Assets pursuant to the change control process. | LOWER |
| CIP-004-3 | R1. | Awareness — The Responsible Entity shall establish, document, implement, and maintain a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security practices. The program shall include security awareness reinforcement on at least a quarterly basis using mechanisms such as: 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.). | LOWER |
| CIP-004-3 | R2. | Training — The Responsible Entity shall establish, document, implement, and maintain an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. The cyber security training program shall be reviewed annually, at a minimum, and shall be updated whenever necessary. | LOWER |
| CIP-004-3 | R2.1. | This program will ensure that all personnel having such access to Critical Cyber Assets, including contractors and service vendors, are trained prior to their being granted such access except in specified circumstances such as an emergency. | MEDIUM |
| CIP-004-3 | R2.2. | Training shall cover the policies, access controls, and procedures as developed for the Critical Cyber Assets covered by CIP-004-3, and include, at a minimum, the following required items appropriate to personnel roles and responsibilities: | MEDIUM |
| CIP-004-3 | R2.2.1. | The proper use of Critical Cyber Assets; | LOWER |
| CIP-004-3 | R2.2.2. | Physical and electronic access controls to Critical Cyber Assets; | LOWER |
| CIP-004-3 | R2.2.3. | The proper handling of Critical Cyber Asset information; and, | LOWER |
| CIP-004-3 | R2.2.4. | Action plans and procedures to recover or re-establish Critical Cyber Assets and access thereto following a Cyber Security Incident. | MEDIUM |
| CIP-004-3 | R2.3. | The Responsible Entity shall maintain documentation that training is conducted at least annually, including the date the training was completed and attendance records. | LOWER |
| CIP-004-3 | R3. | Personnel Risk Assessment —The Responsible Entity shall have a documented personnel | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| Number | Number | risk assessment program, in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements, for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. A personnel risk assessment shall be conducted pursuant to that program prior to such personnel being granted such access except in specified circumstances such as an emergency. The personnel risk assessment program shall at a minimum include: | |
| CIP-004-3 | R3.1. | The Responsible Entity shall ensure that each assessment conducted include, at least, identity verification (e.g., Social Security Number verification in the U.S.) and seven year criminal check. The Responsible Entity may conduct more detailed reviews, as permitted by law and subject to existing collective bargaining unit agreements, depending upon the criticality of the position. | LOWER |
| CIP-004-3 | R3.2. | The Responsible Entity shall update each personnel risk assessment at least every seven years after the initial personnel risk assessment or for cause. | LOWER |
| CIP-004-3 | R3.3. | The Responsible Entity shall document the results of personnel risk assessments of its personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets, and that personnel risk assessments of contractor and service vendor personnel with such access are conducted pursuant to Standard CIP-004-3. | LOWER |
| CIP-004-3 | R4. | Access — The Responsible Entity shall maintain list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets. | LOWER |
| CIP-004-3 | R4.1. | The Responsible Entity shall review the list(s) of its personnel who have such access to Critical Cyber Assets quarterly, and update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, or any change in the access rights of such personnel. The Responsible Entity shall ensure access list(s) for contractors and service vendors are properly maintained. | LOWER |
| CIP-004-3 | R4.2. | The Responsible Entity shall revoke such access to Critical Cyber Assets within 24 hours for personnel terminated for cause and within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. | LOWER |
| CIP-005-3 | R1. | Electronic Security Perimeter — The Responsible Entity shall ensure that every Critical Cyber Asset resides within an Electronic Security Perimeter. The Responsible Entity shall identify and document the Electronic Security Perimeter(s) and all access points to the perimeter(s). | MEDIUM |
| CIP-005-3 | R1.1. | Access points to the Electronic Security Perimeter(s) shall include any externally connected communication end point (for example, dial-up modems) terminating at any device within the Electronic Security Perimeter(s). | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| CIP-005-3 | R1.2. | For a dial-up accessible Critical Cyber Asset that uses a non-routable protocol, the Responsible Entity shall define an Electronic Security Perimeter for that single access point at the dial-up device. | MEDIUM |
| CIP-005-3 | R1.3. | Communication links connecting discrete Electronic Security Perimeters shall not be considered part of the Electronic Security Perimeter. However, end points of these communication links within the Electronic Security Perimeter(s) shall be considered access points to the Electronic Security Perimeter(s). | MEDIUM |
| CIP-005-3 | R1.4. | Any non-critical Cyber Asset within a defined Electronic Security Perimeter shall be identified and protected pursuant to the requirements of Standard CIP-005-3. | MEDIUM |
| CIP-005-3 | R1.5. | Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall be afforded the protective measures as a specified in Standard CIP- 003-3; Standard CIP-004-3 Requirement R3; Standard CIP-005-3 Requirements R2 and R3; Standard CIP-006-3 Requirement R3; Standard CIP-007-3 Requirements R1 and R3 through R9; Standard CIP-008-3; and Standard CIP-009-3. | MEDIUM |
| CIP-005-3 | R1.6. | The Responsible Entity shall maintain documentation of Electronic Security Perimeter(s), all interconnected Critical and non-critical Cyber Assets within the Electronic Security Perimeter(s), all electronic access points to the Electronic Security Perimeter(s) and the Cyber Assets deployed for the access control and monitoring of these access points. | LOWER |
| CIP-005-3 | R2. | Electronic Access Controls — The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s). | MEDIUM |
| CIP-005-3 | R2.1. | These processes and mechanisms shall use an access control model that denies access by default, such that explicit access permissions must be specified. | MEDIUM |
| CIP-005-3 | R2.2. | At all access points to the Electronic Security Perimeter(s), the Responsible Entity shall enable only ports and services required for operations and for monitoring Cyber Assets within the Electronic Security Perimeter, and shall document, individually or by specified grouping, the configuration of those ports and services. | MEDIUM |
| CIP-005-3 | R2.3. | The Responsible Entity shall implement and maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s). | MEDIUM |
| CIP-005-3 | R2.4. | Where external interactive access into the Electronic Security Perimeter has been enabled, the Responsible Entity shall implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible. | MEDIUM |
| CIP-005-3 | R2.5. | The required documentation shall, at least, identify and describe: | LOWER |
| CIP-005-3 | R2.5.1. | The processes for access request and authorization. | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-005-3 | R2.5.2. | The authentication methods. | LOWER |
| CIP-005-3 | R2.5.3. | The review process for authorization rights, in accordance with Standard CIP-004-3 Requirement R4. | LOWER |
| CIP-005-3 | R2.5.4. | The controls used to secure dial-up accessible connections. | LOWER |
| CIP-005-3 | R2.6. | Appropriate Use Banner — Where technically feasible, electronic access control devices shall display an appropriate use banner on the user screen upon all interactive access attempts. The Responsible Entity shall maintain a document identifying the content of the banner. | LOWER |
| CIP-005-3 | R3. | Monitoring Electronic Access — The Responsible Entity shall implement and document an electronic or manual process(es) for monitoring and logging access at access points to the Electronic Security Perimeter(s) twenty-four hours a day, seven days a week. | MEDIUM |
| CIP-005-3 | R3.1. | For dial-up accessible Critical Cyber Assets that use non-routable protocols, the Responsible Entity shall implement and document monitoring process(es) at each access point to the dial-up device, where technically feasible. | MEDIUM |
| CIP-005-3 | R3.2. | Where technically feasible, the security monitoring process(es) shall detect and alert for attempts at or actual unauthorized accesses. These alerts shall provide for appropriate notification to designated response personnel. Where alerting is not technically feasible, the Responsible Entity shall review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. | MEDIUM |
| CIP-005-3 | R4. | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of the electronic access points to the Electronic Security Perimeter(s) at least annually. The vulnerability assessment shall include, at a minimum, the following: | MEDIUM |
| CIP-005-3 | R4.1. | A document identifying the vulnerability assessment process; | LOWER |
| CIP-005-3 | R4.2. | A review to verify that only ports and services required for operations at these access points are enabled; | MEDIUM |
| CIP-005-3 | R4.3. | The discovery of all access points to the Electronic Security Perimeter; | MEDIUM |
| CIP-005-3 | R4.4. | A review of controls for default accounts, passwords, and network management community strings; | MEDIUM |
| CIP-005-3 | R4.5. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | MEDIUM |
| CIP-005-3 | R5. | Documentation Review and Maintenance — The Responsible Entity shall review, update, and maintain all documentation to support compliance with the requirements of Standard CIP-005-3. | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-005-3 | R5.1. | The Responsible Entity shall ensure that all documentation required by Standard CIP- 005-2 reflect current configurations and processes and shall review the documents and procedures referenced in Standard CIP-005-3 at least annually. | LOWER |
| CIP-005-3 | R5.2. | The Responsible Entity shall update the documentation to reflect the modification of the network or controls within ninety calendar days of the change. | LOWER |
| CIP-005-3 | R5.3. | The Responsible Entity shall retain electronic access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-3. | LOWER |
| CIP-006-3 | R1. | Physical Security Plan — The Responsible Entity shall document, implement, and maintain a physical security plan, approved by the senior manager or delegate(s) that shall address, at a minimum, the following: | MEDIUM |
| CIP-006-3 | R1.1. | All Cyber Assets within an Electronic Security Perimeter shall reside within an identified Physical Security Perimeter. Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity shall deploy and document alternative measures to control physical access to such Cyber Assets. | MEDIUM |
| CIP-006-3 | R1.2. | Identification of all physical access points through each Physical Security Perimeter and measures to control entry at those access points. | MEDIUM |
| CIP-006-3 | R1.3 | Processes, tools, and procedures to monitor physical access to the perimeter(s). | MEDIUM |
| CIP-006-3 | R1.4 | Appropriate use of physical access controls as described in Requirement R4 including visitor pass management, response to loss, and prohibition of inappropriate use of physical access controls. | MEDIUM |
| CIP-006-3 | R1.5 | Review of access authorization requests and revocation of access authorization, in accordance with CIP-004-3 Requirement R4. | MEDIUM |
| CIP-006-3 | R1.6 | A visitor control program for visitors (personnel without authorized unescorted access to a Physical Security Perimeter), containing at a minimum the following: | MEDIUM |
| CIP-006-3a | R1.6.1 | Logs (manual or automated) to document the entry and exit of visitors, including the date and time, to and from Physical Security Perimeters. | MEDIUM |
| CIP-006-3a | R1.6.2 | Continuous escorted access of visitors within the Physical Security Perimeter | MEDIUM |
| CIP-006-3 | R1.7 | Update of the physical security plan within thirty calendar days of the completion of any physical security system redesign or reconfiguration, including, but not limited to, addition or removal of access points through the Physical Security Perimeter, physical access controls, monitoring controls, or logging controls. | LOWER |
| CIP-006-3 | R1.8 | Annual review of the physical security plan. | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-006-3 | R2 | Protection of Physical Access Control Systems — Cyber Assets that authorize and/or log access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers, shall: | MEDIUM |
| CIP-006-3 | R2.1. | Be protected from unauthorized physical access. | MEDIUM |
| CIP-006-3 | R2.2. | Be afforded the protective measures specified in Standard CIP-003-3; Standard CIP-004-3 Requirement R3; Standard CIP-005-3 Requirements R2 and R3; Standard CIP-006-3a Requirements R4 and R5; Standard CIP-007-3; Standard CIP-008-3; and Standard CIP- 009-3. | MEDIUM |
| CIP-006-3 | R3 | Protection of Electronic Access Control Systems — Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall reside within an identified Physical Security Perimeter. | MEDIUM |
| CIP-006-3 | R4 | Physical Access Controls — The Responsible Entity shall document and implement the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. The Responsible Entity shall implement one or more of the following physical access methods: Card Key: A means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from | MEDIUM |
| | | one perimeter to another. Special Locks: These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. Security Personnel: Personnel responsible for controlling physical access who | |
| | | may reside on-site or at a monitoring station. Other Authentication Devices: Biometric, keypad, token, or other equivalent devices that control physical access to the Critical Cyber Assets | |
| CIP-006-3 | R5 | Monitoring Physical Access — The Responsible Entity shall document and implement the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. Unauthorized access attempts shall be reviewed immediately and handled in accordance with the procedures specified in Requirement CIP-008-3. One or more of the following monitoring methods shall be used: | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| | | • Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel responsible for response. | |
| | | Human Observation of Access Points: Monitoring of physical access points by authorized personnel as specified in Requirement R4. | |
| CIP-006-3 | R6 | Logging Physical Access — Logging shall record sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. The Responsible Entity shall implement and document the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: | LOWER |
| | | • Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method. | |
| | | • Video Recording: Electronic capture of video images of sufficient quality to determine identity. | |
| | | Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4 | |
| CIP-006-3 | R7 | Access Log Retention — The responsible entity shall retain physical access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-3. | LOWER |
| CIP-006-3 | R8 | Maintenance and Testing — The Responsible Entity shall implement a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly. The program must include, at a minimum, the following: | MEDIUM |
| CIP-006-3 | R8.1 | Testing and maintenance of all physical security mechanisms on a cycle no longer than three years. | MEDIUM |
| CIP-006-3 | R8.2 | Retention of testing and maintenance records for the cycle determined by the Responsible Entity in Requirement R8.1. | LOWER |
| CIP-006-3 | R8.3 | Retention of outage records regarding access controls, logging, and monitoring for a minimum of one calendar year. | LOWER |
| CIP-007-3 | R1. | Test Procedures — The Responsible Entity shall ensure that new Cyber Assets and significant changes to existing Cyber Assets within the Electronic Security Perimeter do not adversely affect existing cyber security controls. For purposes of Standard CIP-007-3, a significant change shall, at a minimum, include implementation of security patches, | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| Number | Number | cumulative service packs, vendor releases, and version upgrades of operating systems, | |
| CIP-007-3 | R1.1. | applications, database platforms, or other third-party software or firmware.The Responsible Entity shall create, implement, and maintain cyber security testprocedures in a manner that minimizes adverse effects on the production system or itsoperation. | LOWER |
| CIP-007-3 | R1.2. | The Responsible Entity shall document that testing is performed in a manner that reflects the production environment. | LOWER |
| CIP-007-3 | R1.3. | The Responsible Entity shall document test results. | LOWER |
| CIP-007-3 | R2. | Ports and Services — The Responsible Entity shall establish, document and implement a process to ensure that only those ports and services required for normal and emergency operations are enabled. | MEDIUM |
| CIP-007-3 | R2.1. | The Responsible Entity shall enable only those ports and services required for normal and emergency operations. | MEDIUM |
| CIP-007-3 | R2.2. | The Responsible Entity shall disable other ports and services, including those used for testing purposes, prior to production use of all Cyber Assets inside the Electronic Security Perimeter(s). | MEDIUM |
| CIP-007-3 | R2.3. | In the case where unused ports and services cannot be disabled due to technical limitations, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | MEDIUM |
| CIP-007-3 | R3. | Security Patch Management — The Responsible Entity, either separately or as a component of the documented configuration management process specified in CIP-003- 3 Requirement R6, shall establish, document and implement a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | LOWER |
| CIP-007-3 | R3.1. | The Responsible Entity shall document the assessment of security patches and security upgrades for applicability within thirty calendar days of availability of the patches or upgrades. | LOWER |
| CIP-007-3 | R3.2. | The Responsible Entity shall document the implementation of security patches. In any case where the patch is not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | LOWER |
| CIP-007-3 | R4. | Malicious Software Prevention — The Responsible Entity shall use anti-virus software and other malicious software ("malware") prevention tools, where technically feasible, to detect, prevent, deter, and mitigate the introduction, exposure, and propagation of malware on all Cyber Assets within the Electronic Security Perimeter(s). | MEDIUM |
| CIP-007-3 | R4.1. | The Responsible Entity shall document and implement anti-virus and malware prevention tools. In the case where anti-virus software and malware prevention tools are | MEDIUM |

| Standard | Requirement | Text of Requirement | VRF |
|-----------|-------------|--|--------|
| Number | Number | not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | |
| CIP-007-3 | R4.2. | The Responsible Entity shall document and implement a process for the update of anti- virus and malware prevention "signatures." The process must address testing and installing the signatures. | MEDIUM |
| CIP-007-3 | R5. | Account Management — The Responsible Entity shall establish, implement, and document technical and procedural controls that enforce access authentication of, and accountability for, all user activity, and that minimize the risk of unauthorized system access. | LOWER |
| CIP-007-3 | R5.1. | The Responsible Entity shall ensure that individual and shared system accounts and authorized access permissions are consistent with the concept of "need to know" with respect to work functions performed. | MEDIUM |
| CIP-007-3 | R5.1.1. | The Responsible Entity shall ensure that user accounts are implemented as approved by designated personnel. Refer to Standard CIP-003-3 Requirement R5. | LOWER |
| CIP-007-3 | R5.1.2. | The Responsible Entity shall establish methods, processes, and procedures that generate logs of sufficient detail to create historical audit trails of individual user account access activity for a minimum of ninety days. | LOWER |
| CIP-007-3 | R5.1.3. | The Responsible Entity shall review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003-3 Requirement R5 and Standard CIP-004-3 Requirement R4. | MEDIUM |
| CIP-007-3 | R5.2. | The Responsible Entity shall implement a policy to minimize and manage the scope and acceptable use of administrator, shared, and other generic account privileges including factory default accounts. | LOWER |
| CIP-007-3 | R5.2.1. | The policy shall include the removal, disabling, or renaming of such accounts where possible. For such accounts that must remain enabled, passwords shall be changed prior to putting any system into service. | MEDIUM |
| CIP-007-3 | R5.2.2. | The Responsible Entity shall identify those individuals with access to shared accounts. | LOWER |
| CIP-007-3 | R5.2.3. | Where such accounts must be shared, the Responsible Entity shall have a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps for securing the account in the event of personnel changes (for example, change in assignment or termination). | MEDIUM |
| CIP-007-3 | R5.3. | At a minimum, the Responsible Entity shall require and use passwords, subject to the following, as technically feasible: | LOWER |
| CIP-007-3 | R5.3.1. | Each password shall be a minimum of six characters. | LOWER |
| CIP-007-3 | R5.3.2. | Each password shall consist of a combination of alpha, numeric, and "special" characters. | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| CIP-007-3 | R5.3.3. | Each password shall be changed at least annually, or more frequently based on risk. | MEDIUM |
| CIP-007-3 | R6. | Security Status Monitoring — The Responsible Entity shall ensure that all Cyber Assets within the Electronic Security Perimeter, as technically feasible, implement automated tools or organizational process controls to monitor system events that are related to cyber security. | LOWER |
| CIP-007-3 | R6.1. | The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter. | MEDIUM |
| CIP-007-3 | R6.2. | The security monitoring controls shall issue automated or manual alerts for detected Cyber Security Incidents. | MEDIUM |
| CIP-007-3 | R6.3. | The Responsible Entity shall maintain logs of system events related to cyber security, where technically feasible, to support incident response as required in Standard CIP-008-3. | MEDIUM |
| CIP-007-3 | R6.4. | The Responsible Entity shall retain all logs specified in Requirement R6 for ninety calendar days. | LOWER |
| CIP-007-3 | R6.5. | The Responsible Entity shall review logs of system events related to cyber security and maintain records documenting review of logs. | LOWER |
| CIP-007-3 | R7. | Disposal or Redeployment — The Responsible Entity shall establish and implement formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-3. | LOWER |
| CIP-007-3 | R7.1. | Prior to the disposal of such assets, the Responsible Entity shall destroy or erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | LOWER |
| CIP-007-3 | R7.2. | Prior to redeployment of such assets, the Responsible Entity shall, at a minimum, erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | LOWER |
| CIP-007-3 | R7.3. | The Responsible Entity shall maintain records that such assets were disposed of or redeployed in accordance with documented procedures. | LOWER |
| CIP-007-3 | R8 | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of all Cyber Assets within the Electronic Security Perimeter at least annually. The vulnerability assessment shall include, at a minimum, the following: | LOWER |
| CIP-007-3 | R8.1. | A document identifying the vulnerability assessment process; | LOWER |
| CIP-007-3 | R8.2. | A review to verify that only ports and services required for operation of the Cyber Assets within the Electronic Security Perimeter are enabled; | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-007-3 | R8.3. | A review of controls for default accounts; and, | MEDIUM |
| CIP-007-3 | R8.4. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | MEDIUM |
| CIP-007-3 | R9 | Documentation Review and Maintenance — The Responsible Entity shall review and update the documentation specified in Standard CIP-007-3 at least annually. Changes resulting from modifications to the systems or controls shall be documented within thirty calendar days of the change being completed. | LOWER |
| CIP-008-3 | R1. | Cyber Security Incident Response Plan — The Responsible Entity shall develop and maintain a Cyber Security Incident response plan and implement the plan in response to Cyber Security Incidents. The Cyber Security Incident response plan shall address, at a minimum, the following: | LOWER |
| CIP-008-3 | R1.1. | Procedures to characterize and classify events as reportable Cyber Security Incidents. | LOWER |
| CIP-008-3 | R1.2. | Response actions, including roles and responsibilities of Cyber Security Incident response teams, Cyber Security Incident handling procedures, and communication plans. | LOWER |
| CIP-008-3 | R1.3. | Process for reporting Cyber Security Incidents to the Electricity Sector Information Sharing and Analysis Center (ES-ISAC). The Responsible Entity must ensure that all reportable Cyber Security Incidents are reported to the ES-ISAC either directly or through an intermediary. | LOWER |
| CIP-008-3 | R1.4. | Process for updating the Cyber Security Incident response plan within thirty calendar days of any changes. | LOWER |
| CIP-008-3 | R1.5. | Process for ensuring that the Cyber Security Incident response plan is reviewed at least annually. | LOWER |
| CIP-008-3 | R1.6. | Process for ensuring the Cyber Security Incident response plan is tested at least annually. A test of the Cyber Security Incident response plan can range from a paper drill, to a full operational exercise, to the response to an actual incident. | LOWER |
| CIP-008-3 | R2 | | |
| CIP-009-3 | R1 | Recovery Plans — The Responsible Entity shall create and annually review recovery plan(s) for Critical Cyber Assets. The recovery plan(s) shall address at a minimum the following: | MEDIUM |
| CIP-009-3 | R1.1. | Specify the required actions in response to events or conditions of varying duration and severity that would activate the recovery plan(s). | MEDIUM |
| CIP-009-3 | R1.2. | Define the roles and responsibilities of responders. | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|-------|
| CIP-009-3 | R2 | Exercises — The recovery plan(s) shall be exercised at least annually. An exercise of the recovery plan(s) can range from a paper drill, to a full operational exercise, to recovery from an actual incident. | LOWER |
| CIP-009-3 | R3 | Change Control — Recovery plan(s) shall be updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. Updates shall be communicated to personnel responsible for the activation and implementation of the recovery plan(s) within thirty calendar days of the change being completed. | LOWER |
| CIP-009-3 | R4 | Backup and Restore — The recovery plan(s) shall include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. For example, backups may include spare electronic components or equipment, written documentation of configuration settings, tape backup, etc. | LOWER |
| CIP-009-3 | R5 | Testing Backup Media — Information essential to recovery that is stored on backup media shall be tested at least annually to ensure that the information is available. Testing can be completed off site. | LOWER |

CIP Version 3 Violation Severity Levels and Violation Risk Factors

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|---|--|--|
| CIP-002-3 | R1. | Critical Asset Identification Method — The Responsible Entity shall identify and document a risk-based assessment methodology to use to identify its Critical Assets. | N/A | N/A | N/A | The responsible entity has not documented a risk- based assessment methodology to use to identify its Critical Assets as specified in R1. |
| CIP-002-3 | R1.1 | The Responsible Entity shall maintain documentation describing its risk- based assessment methodology that includes procedures and evaluation criteria. | N/A | The Responsible Entity maintained documentation describing its risk- based assessment methodology which includes evaluation criteria, but does not include procedures. | The Responsible Entity maintained documentation describing its risk- based assessment methodology that includes procedures but does not include evaluation criteria. | The Responsible Entity did not maintain documentation describing its risk- based assessment methodology that includes procedures and evaluation criteria. |
| CIP-002-3 | R1.2 | The risk-based assessment shall consider the following assets: | N/A | N/A | N/A | The Responsible Entity did not consider all of the asset types listed in R1.2.1 through R1.2.7 in its risk- based assessment. |
| CIP-002-3 | R1.2.1. | Control centers and backup control centers performing the functions of the entities listed in the Applicability section of this standard. | N/A | N/A | N/A | N/A |
| CIP-002-3 | R1.2.2. | Transmission substations that support the reliable operation of the Bulk Electric System. | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|--|---|
| CIP-002-3 | R1.2.3. | Generation resources that support the reliable operation of the Bulk Electric System. | N/A | N/A | N/A | N/A |
| CIP-002-3 | R1.2.4. | Systems and facilities critical to system restoration, including blackstart generators and substations in the electrical path of transmission lines used for initial system restoration. | N/A | N/A | N/A | N/A |
| CIP-002-3 | R1.2.5. | Systems and facilities critical to automatic load shedding under a common control system capable of shedding 300 MW or more. | N/A | N/A | N/A | N/A |
| CIP-002-3 | R1.2.6. | Special Protection Systems that support the reliable operation of the Bulk Electric System. | N/A | N/A | N/A | N/A |
| CIP-002-3 | R1.2.7. | Any additional assets that support the reliable operation of the Bulk Electric System that the Responsible Entity deems appropriate to include in its assessment. | N/A | N/A | N/A | N/A |
| CIP-002-3 | R2. | Critical Asset Identification — The Responsible Entity shall develop a list of its identified Critical Assets determined through an annual application of the risk-based assessment methodology required in R1. The Responsible Entity shall review this list at least annually, and update it as necessary. | N/A | N/A | The Responsible Entity has developed a list of Critical Assets but the list has not been reviewed and updated annually as required. | The Responsible Entity did not develop a list of its identified Critical Assets even if such list is null. |
| CIP-002-3 | R3. | Critical Cyber Asset Identification — Using the list of Critical Assets developed pursuant to Requirement R2, the Responsible Entity shall develop a list of associated Critical Cyber Assets essential to the | N/A | N/A | The Responsible Entity has developed a list of associated Critical Cyber Assets essential to the operation of the | The Responsible Entity did not develop a list of associated Critical Cyber Assets essential to the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|---|---|
| | | operation of the Critical Asset. Examples at control centers and backup control centers include systems and facilities at master and remote sites that provide monitoring and control, automatic generation control, real-time power system modeling, and real-time inter-utility data exchange. The Responsible Entity shall review this list at least annually, and update it as necessary. For the purpose of Standard CIP-002- 3, Critical Cyber Assets are further qualified to be those having at least one of the following characteristics: | | | Critical Asset list as per requirement R2 but the list has not been reviewed and updated annually as required. | operation of the Critical Asset list as per requirement R2 even if such list is null. |
| CIP-002-3 | R3.1 | The Cyber Asset uses a routable protocol to communicate outside the Electronic Security Perimeter; or, | N/A | N/A | N/A | A Cyber Asset essential to the operation of the Critical Asset was identified that met the criteria in this requirement but was not included in the Critical Cyber Asset List. |
| CIP-002-3 | R3.2. | The Cyber Asset uses a routable protocol within a control center; or, | N/A | N/A | N/A | A Cyber Asset essential to the operation of the Critical Asset was identified that met the criteria in this requirement but was not included in the Critical Cyber Asset List. |
| CIP-002-3 | R3.3. | The Cyber Asset is dial-up accessible. | N/A | N/A | N/A | A Cyber Asset |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|---|---|--|
| | | | | | | essential to the operation of the Critical Asset was identified that met the criteria in this requirement but was not included in the Critical Cyber Asset List. |
| CIP-002-3 | R4. | Annual Approval — The senior manager or delegate(s) shall approve annually the risk-based assessment methodology, the list of Critical Assets and the list of Critical Cyber Assets. Based on Requirements R1, R2, and R3 the Responsible Entity may determine that it has no Critical Assets or Critical Cyber Assets. The Responsible Entity shall keep a signed and dated record of the senior manager or delegate(s)'s approval of the risk-based assessment methodology, the list of Critical Assets and the list of Critical Cyber Assets (even if such lists are null.) | N/A | The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s)'s annual approval of the risk- based assessment methodology, the list of Critical Assets or the list of Critical Cyber Assets (even if such lists are null.) | The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s)'s annual approval of two of the following: the risk-based assessment methodology, the list of Critical Assets or the list of Critical Cyber Assets (even if such lists are null.) | The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s) annual approval of 1) A risk based assessment methodology for identification of Critical Assets, 2) a signed and dated approval of the list of Critical Assets, nor 3) a signed and dated approval of the list of Critical Cyber Assets (even if such lists are null.) |
| CIP-003-3 | R1. | Cyber Security Policy — The Responsible Entity shall document and implement a cyber security policy that represents management's commitment and ability to secure its Critical Cyber Assets. The Responsible Entity shall, | N/A | N/A | N/A | The Responsible Entity has not documented or implemented a cyber security policy. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|----------|---|
| CIP-003-3 | R1.1. | at minimum, ensure the following: The cyber security policy addresses the requirements in Standards CIP- 002-3 through CIP-009-3, including provision for emergency situations. | N/A | N/A | N/A | The Responsible Entity's cyber security policy does not address all the requirements in Standards CIP-002 through CIP-009, including provision for emergency situations. |
| CIP-003-3 | R1.2. | The cyber security policy is readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets. | N/A | N/A | N/A | The Responsible Entity's cyber security policy is not readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets. |
| CIP-003-3 | R1.3 | Annual review and approval of the cyber security policy by the senior manager assigned pursuant to R2. | N/A | N/A | N/A | The Responsible Entity's senior manager, assigned pursuant to R2, did not complete the annual review and approval of its cyber security policy. |
| CIP-003-3 | R2. | Leadership — The Responsible Entity shall assign a senior manager with overall responsibility for leading and managing the entity's implementation of, and adherence to, Standards CIP-002-3 through CIP- 009-3. | N/A | N/A | N/A | The Responsible Entity has not assigned a single senior manager with overall responsibility and authority for leading and managing the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | entity's implementation of, and adherence to, Standards CIP-002 through CIP-009. |
| CIP-003-3 | R2.1. | The senior manager shall be identified by name, title, and date of designation. | N/A | N/A | N/A | The senior manager is not identified by name, title, and date of designation. Identification of the senior manager is missing one of the following: name, title, or date of designation. |
| CIP-003-3 | R2.2. | Changes to the senior manager must be documented within thirty calendar days of the effective date. | N/A | N/A | N/A | Changes to the senior manager were not documented within 30 days of the effective date. |
| CIP-003-3 | R2.3. | Where allowed by Standards CIP- 002-3 through CIP-009-3, the senior manager may delegate authority for specific actions to a named delegate or delegates. These delegations shall be documented in the same manner as R2.1 and R2.2, and approved by the senior manager. | N/A | N/A | The identification of a senior manager's delegate does not include at least one of the following; name, title, or date of the designation, OR The document is not approved by the senior manager, | A senior manager's delegate is not identified by name, title, and date of designation; the document delegating the authority does not identify the authority being delegated; the document delegating the authority is not approved by the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | OR Changes to the delegated authority are not documented within thirty calendar days of the effective date. | senior manager; AND changes to the delegated authority are not documented within thirty calendar days of the effective date. |
| CIP-003-3 | R2.4 | The senior manager or delegate(s), shall authorize and document any exception from the requirements of the cyber security policy. | N/A | N/A | N/A | The senior manager or delegate(s) did not authorize and document any exceptions from the requirements of the cyber security policy as required. |
| CIP-003-3 | R3. | Exceptions — Instances where the Responsible Entity cannot conform to its cyber security policy must be documented as exceptions and authorized by the senior manager or delegate(s). | N/A | N/A | In Instances where the Responsible Entity cannot conform to its cyber security policy, in R1, exceptions were documented, but were not authorized by the senior manager or delegate(s). | In Instances where the Responsible Entity cannot conform to its cyber security policy, in R1, exceptions were not documented. |
| CIP-003-3 | R3.1. | Exceptions to the Responsible Entity's cyber security policy must be documented within thirty days of being approved by the senior manager or delegate(s). | N/A | N/A | N/A | Exceptions to the Responsible Entity's cyber security policy were not documented within 30 days of being |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | approved by the senior manager or delegate(s). |
| CIP-003-3 | R3.2. | Documented exceptions to the cyber security policy must include an explanation as to why the exception is necessary and any compensating measures. | N/A | N/A | The Responsible Entity has a documented exception to the cyber security policy (pertaining to CIP 002 through CIP 009)in R1 but did not include either : 1) an explanation as to why the exception is necessary, or 2) any compensating measures. | The Responsible Entity has a documented exception to the cyber security policy <u>in R1(pertaining to</u> <u>CIP 002 through CIP</u> 009) but did not include both : 1) an explanation as to why the exception is necessary, and 2) any compensating measures. |
| CIP-003-3 | R3.3. | Authorized exceptions to the cyber security policy must be reviewed and approved annually by the senior manager or delegate(s) to ensure the exceptions are still required and valid. Such review and approval shall be documented. | N/A | N/A | N/A | Exceptions to the cyber security policy were not reviewed or were not approved on an annual basis by the senior manager or delegate(s) to ensure the exceptions are still required and valid or the review and approval is not documented. |
| CIP-003-3 | R4. | Information Protection — The Responsible Entity shall implement | N/A | N/A | N/A | The Responsible Entity did not |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | and document a program to identify, classify, and protect information associated with Critical Cyber Assets. | | | | implement or did not document a program to identify, classify, and protect information associated with Critical Cyber Assets. |
| CIP-003-3 | R4.1. | The Critical Cyber Asset information to be protected shall include, at a minimum and regardless of media type, operational procedures, lists as required in Standard CIP- 002-3, network topology or similar diagrams, floor plans of computing centers that contain Critical Cyber Assets, equipment layouts of Critical Cyber Assets, disaster recovery plans, incident response plans, and security configuration information. | N/A | N/A | The information protection program does not include one of the minimum information types to be protected as detailed in R4.1. | The information protection program does not include two or more of the minimum information types to be protected as detailed in R4.1. |
| CIP-003-3 | R4.2. | The Responsible Entity shall classify information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. | N/A | N/A | N/A | The Responsible Entity did not classify the information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. |
| CIP-003-3 | R4.3. | The Responsible Entity shall, at least annually, assess adherence to its Critical Cyber Asset information protection program, document the assessment results, and implement an action plan to remediate deficiencies identified during the assessment. | N/A | N/A | N/A | The Responsible Entity did not annually assess adherence to its Critical Cyber Asset information protection program, including |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | documentation of the assessment results, OR The Responsible Entity did not implement an action plan to remediate deficiencies identified during the assessment. |
| CIP-003-3 | R5. | Access Control — The Responsible Entity shall document and implement a program for managing access to protected Critical Cyber Asset information. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document a program for managing access to protected Critical Cyber Asset information. |
| CIP-003-3 | R5.1. | The Responsible Entity shall maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information. | N/A | N/A | The Responsible Entity maintained a list of designated personnel for authorizing either logical or physical access but not both. | The Responsible Entity did not maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information. |
| CIP-003-3 | R5.1.1. | Personnel shall be identified by name, title, and the information for which they are responsible for authorizing access. | N/A | N/A | The Responsible Entity did identify the personnel by name, title, and the information for | Personnel are not identified by name, title, or the information for which they are |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | which they are responsible for authorizing access, but the business phone is missing. | responsible for authorizing access. |
| CIP-003-3 | R5.1.2. | The list of personnel responsible for authorizing access to protected information shall be verified at least annually. | N/A | N/A | N/A | The Responsible Entity did not verify at least annually the list of personnel responsible for authorizing access to protected information. |
| CIP-003-3 | R5.2. | The Responsible Entity shall review at least annually the access privileges to protected information to confirm that access privileges are correct and that they correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities. | N/A | N/A | N/A | The Responsible Entity did not review at least annually the access privileges to protected information to confirm that access privileges are correct and that they correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities. |
| CIP-003-3 | R5.3. | The Responsible Entity shall assess and document at least annually the processes for controlling access privileges to protected information. | N/A | N/A | N/A | The Responsible Entity did not assess and document at least annually the processes for controlling access privileges to protected |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | information. |
| CIP-003-3 | R6. | Change Control and Configuration Management — The Responsible Entity shall establish and document a process of change control and configuration management for adding, modifying, replacing, or removing Critical Cyber Asset hardware or software, and implement supporting configuration management activities to identify, control and document all entity or vendor related changes to hardware and software components of Critical Cyber Assets pursuant to the change control process. | N/A | N/A | N/A | The Responsible Entity has not established or documented a change control process for the activities required in R6, OR The Responsible Entity has not established or documented a configuration management process for the activities required in R6. |
| CIP-004-3 | R1. | Awareness — The Responsible Entity shall establish, document, implement, and maintain a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security practices. The program shall include security awareness reinforcement on at least a quarterly basis using mechanisms such as: • Direct communications (e.g. emails, memos, computer based training, etc.); • Indirect communications | <u>N/A</u> The Responsible Entity established, implemented, and maintained but did not document a security awareness program to ensure personnel having authorized cyber or authorized cyber or authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security | <u>N/A</u> The Responsibility Entity did not provide security awareness reinforcement on at least a quarterly basis. | The Responsible Entity did document but did not establish, implement, nor maintain a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security | The Responsible Entity did not establish, implement, maintain, n or document a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | (e.g. posters, intranet, brochures, etc.); Management support and reinforcement (e.g., presentations, meetings, etc.). | practices. | | practices.The Responsible[1]Entity did notprovide securityawarenessreinforcement on atleast a quarterlybasis. | practices. |
| CIP-004-3 | R2. | Training — The Responsible Entity shall establish, document, implement, and maintain an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. The cyber security training program shall be reviewed annually, at a minimum, and shall be updated whenever necessary. | <u>N/A</u> The Responsible Entity established, implemented, and maintained but did not document an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. | <u>N/A</u> The Responsibility Entity did not review the training program on an annual basis. | The Responsible Entity did document but did not establish, implement, nor maintain an annual cyber security training program for personnel having authorized cyber or authorized duthorized unescorted physical access to Critical Cyber Assets- The Responsible[²] Entity did not review the training program on an annual basis. | The Responsible Entity did not establish, implement, maintain, n or document an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. |
| CIP-004-3 | R2.1. | This program will ensure that all personnel having such access to Critical Cyber Assets, including contractors and service vendors, are trained prior to their being granted | <u>N/AAt least one</u> individual but less than 5% of personnel having authorized cyber or | <u>N/AAt least 5% but</u> less than 10% of all personnel having authorized cyber or unescorted physical | <u>N/AAt least 10% but</u> less than 15% of all personnel having authorized cyber or unescorted physical | 15% or more of <u>Not</u> all personnel having authorized cyber or unescorted physical access to Critical |

¹ Please note that FERC's January 20, 2011 Order on Version 2 And Version 3 Violation Risk Factors And Violation Severity Levels For Critical Infrastructure Protection Reliability Standards dictated "Responsible Entity" to be changed to "Responsibility Entity." NERC assumes FERC intended the VSL to read "Responsible Entity" and therefore is not making this change. NERC proposes to remove this footnote from the final approved list of VSLs.

² Please see previous footnote. NERC proposes to remove this footnote from the final approved list of VSLs.

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | such access except in specified circumstances such as an emergency. | unescorted physical access to Critical Cyber Assets, including contractors and service vendors, were not trained prior to their being granted such access except in specified circumstances such as an emergency. | access to Critical Cyber Assets, including contractors and service vendors, were not trained prior to their being granted such access except in specified circumstances such as an emergency. | access to Critical Cyber Assets, including contractors and service vendors, were not trained prior to their being granted such access except in specified circumstances such as an emergency. | Cyber Assets, including contractors and service vendors, were not trained prior to their being granted such access except in specified circumstances such as an emergency. |
| CIP-004-3 | R2.2. | Training shall cover the policies, access controls, and procedures as developed for the Critical Cyber Assets covered by CIP-004-3, and include, at a minimum, the following required items appropriate to personnel roles and responsibilities: | N/A | N/A | N/A | The training does not include one or more of the minimum topics as detailed in R2.2.1, R2.2.2, R2.2.3, R2.2.4. |
| CIP-004-3 | R2.2.1. | The proper use of Critical Cyber Assets; | N/A | N/A | N/A | N/A |
| CIP-004-3 | R2.2.2. | Physical and electronic access controls to Critical Cyber Assets; | N/A | N/A | N/A | N/A |
| CIP-004-3 | R2.2.3. | The proper handling of Critical Cyber Asset information; and, | N/A | N/A | N/A | N/A |
| CIP-004-3 | R2.2.4. | Action plans and procedures to recover or re-establish Critical Cyber Assets and access thereto following a Cyber Security Incident. | N/A | N/A | N/A | N/A |
| CIP-004-3 | R2.3. | The Responsible Entity shall maintain documentation that training is conducted at least annually, including the date the training was completed and attendance records. | N/A | N/A | The Responsible Entity did maintain documentation that training is conducted at least annually, but did not | The Responsible Entity did not maintain documentation that training is conducted at least |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | include attendance records. | annually, including the date the training was completed and attendance records. |
| CIP-004-3 | R3. | Personnel Risk Assessment —The Responsible Entity shall have a documented personnel risk assessment program, in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements, for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. A personnel risk assessment shall be conducted pursuant to that program prior to such personnel being granted such access except in specified circumstances such as an emergency. The personnel risk assessment program shall at a minimum include: | N/A | The Responsible Entity has a personnel risk assessment program, in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements, as stated in R3, for personnel having authorized cyber or authorized unescorted physical access, but the program is not documented. | The Responsible Entity has a personnel risk assessment program as stated in R3, but conducted the personnel risk assessment pursuant to that program after such personnel were granted such access except in specified circumstances such as an emergency. | The Responsible Entity does not have a documented personnel risk assessment program, in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements,as stated in R3, -for personnel having authorized cyber or authorized cyber or authorized of the personnel having authorized solver or authorized in R3, -for personnel having authorized cyber or authorized cyber or authorized in R3, -for personnel having authorized of the personnel risk assessment pursuant to that program for personnel granted such access except in specified |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | circumstances such as an emergency. |
| CIP-004-3 | R3.1. | The Responsible Entity shall ensure that each assessment conducted include, at least, identity verification (e.g., Social Security Number verification in the U.S.) and seven year criminal check. The Responsible Entity may conduct more detailed reviews, as permitted by law and subject to existing collective bargaining unit agreements, depending upon the criticality of the position. | N/A | N/A | The Responsible Entity did not ensure that an assessment conducted included an identity verification (e.g., Social Security Number verification in the U.S.) or a seven-year criminal check. | The Responsible Entity did not ensure that each assessment conducted include, at least, identity verification (e.g., Social Security Number verification in the U.S.) and seven-year criminal check. |
| CIP-004-3 | R3.2. | The Responsible Entity shall update each personnel risk assessment at least every seven years after the initial personnel risk assessment or for cause. | N/A | The Responsible Entity did not update each personnel risk assessment at least every seven years after the initial personnel risk assessment but did update it for cause when applicable. | The Responsible Entity did not update each personnel risk assessment for cause (when applicable) but did at least updated it every seven years after the initial personnel risk assessment. | The Responsible Entity did not update each personnel risk assessment at least every seven years after the initial personnel risk assessment nor was it updated for cause when applicable. |
| CIP-004-3 | R3.3. | The Responsible Entity shall document the results of personnel risk assessments of its personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets, and that personnel risk assessments of contractor and service vendor personnel with such access are conducted pursuant to Standard CIP- | The Responsible Entity did not document the results of personnel risk assessments for at least one individual but less than 5% of all personnel with authorized cyber or | The Responsible Entity did not document the results of personnel risk assessments for 5% or more but less than 10% of all personnel with authorized cyber or authorized | The Responsible Entity did not document the results of personnel risk assessments for 10% or more but less than 15% of all personnel with authorized cyber or authorized | The Responsible Entity did not document the results of personnel risk assessments for 15% or more of all personnel with authorized cyber or authorized unescorted physical |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | 004-3. | authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | access to Critical Cyber Assets, pursuant to Standard CIP-004. |
| CIP-004-3 | R4. | Access — The Responsible Entity shall maintain list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets. | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets, missing at least one individual but less than 5% of the authorized personnel. | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets, missing 5% or more but less than 10% of the authorized personnel. | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets, missing 10% or more but less than 15% of the authorized personnel. | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets, missing 15% or more of the authorized personnel. |
| CIP-004-3 | R4.1. | The Responsible Entity shall review the list(s) of its personnel who have such access to Critical Cyber Assets quarterly, and update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, or any change in the access rights of such personnel. The Responsible Entity shall ensure access list(s) for contractors and service vendors are | N/A | The Responsible Entity did not review the list(s) of its personnel who have access to Critical Cyber Assets quarterly. | The Responsible Entity did not update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, nor any change in the access rights of such personnel. | The Responsible Entity did not review the list(s) of all personnel who have access to Critical Cyber Assets quarterly, nor update the list(s) within seven calendar days of any change of personnel |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | properly maintained. | | | | with such access to Critical Cyber Assets, nor any change in the access rights of such personnel. |
| CIP-004-3 | R4.2. | The Responsible Entity shall revoke such access to Critical Cyber Assets within 24 hours for personnel terminated for cause and within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. | N/A | The Responsible Entity did not revoke access within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. | The Responsible Entity did not revoke access to Critical Cyber Assets within 24 hours for personnel terminated for cause. | The Responsible Entity did not revoke access to Critical Cyber Assets within 24 hours for personnel terminated for cause nor within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. |
| CIP-005-3 | R1. | Electronic Security Perimeter — The Responsible Entity shall ensure that every Critical Cyber Asset resides within an Electronic Security Perimeter. The Responsible Entity shall identify and document the Electronic Security Perimeter(s) and all access points to the perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not ensure that every Critical Cyber Asset resides within an Electronic Security Perimeter. OR The Responsible Entity did not identify and document the Electronic Security Perimeter(s) and all access points to the perimeter(s). |
| CIP-005-3 | R1.1. | Access points to the Electronic Security Perimeter(s) shall include | N/A | N/A | N/A | Access points to the Electronic Security |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | any externally connected communication end point (for example, dial-up modems) terminating at any device within the Electronic Security Perimeter(s). | | | | Perimeter(s) do not include all externally connected communication end point (for example, dial-up modems) terminating at any device within the Electronic Security Perimeter(s). |
| CIP-005-3 | R1.2. | For a dial-up accessible Critical Cyber Asset that uses a non-routable protocol, the Responsible Entity shall define an Electronic Security Perimeter for that single access point at the dial-up device. | N/A | N/A | N/A | For one or more dial-up accessible Critical Cyber Assets that use a non- routable protocol, the Responsible Entity did not define an Electronic Security Perimeter for that single access point at the dial-up device. |
| CIP-005-3 | R1.3. | Communication links connecting discrete Electronic Security Perimeters shall not be considered part of the Electronic Security Perimeter. However, end points of these communication links within the Electronic Security Perimeter(s) shall be considered access points to the Electronic Security Perimeter(s). | N/A | N/A | N/A | At least one end point of a communication link within the Electronic Security Perimeter(s) connecting discrete Electronic Security Perimeters was not considered an access point to the Electronic Security Perimeter. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-005-3 | R1.4. | Any non-critical Cyber Asset within a defined Electronic Security Perimeter shall be identified and protected pursuant to the requirements of Standard CIP-005-3. | N/A | N/A | N/A | One or more noncritical Cyber Asset within a defined Electronic Security Perimeter is not identified. OR Is not protected pursuant to the requirements of Standard CIP-005. |
| CIP-005-3 | R1.5. | Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall be afforded the protective measures as a specified in Standard CIP- 003-3; Standard CIP-004-3 Requirement R3; Standard CIP-005-3 Requirements R2 and R3; Standard CIP-006-3 Requirement R3; Standard CIP-007-3 Requirements R1 and R3 through R9; Standard CIP-008-3; and Standard CIP-009-3. | N/AA Cyber Asset used in the access control and/or monitoring of the Electronic Security Perimeter(s) is provided with all but one (1) of the protective measures as specified in Standard CIP-003-3; Standard CIP-004-3 Requirement R3; Standard CIP- 005-3 Requirements R2 and R3; Standard CIP-006-3a Requirements R3, Standard CIP- 007-3 Requirements R1 and R3 through R9;, Standard CIP-008-3; | N/AA Cyber Asset used in the access control and/or monitoring of the Electronic Security Perimeter(s) is provided with all but two (2) of the protective measures as specified in Standard CIP-003-3; Standard CIP-004-3 Requirement R3;, Standard CIP- 005-3 Requirements R2 and R3; Standard CIP-006-3a Requirements R3; Standard CIP- 007-3 Requirements R1 and R3 through R9;, Standard CIP-008-3; | N/AA Cyber Asset used in the access control and/or monitoring of the Electronic Security Perimeter(s) is provided with all but three (3) of the protective measures as specified in Standard CIP-003-3; Standard CIP-004-3 Requirement R3; Standard CIP- 005-3 Requirements R2 and R3; Standard CIP-006-3a Requirements R3; Standard CIP- 007-3 Requirements R1 and R3 through R9; Standard CIP-008-3; | A Cyber Asset used in the access control and/or monitoring of the Electronic Security Perimeter(s) <u>was not</u> <u>afforded is</u> not provided without four (4) one (1) or more of the protective measures as_specified in Standard CIP-003-3; Standard CIP-004-3 Requirement R3; Standard CIP- 005-3 Requirements R2 and R3; Standard CIP-006-3c Requirements R3; Standard CIP-007-3 Requirements R1 and R3 through R9; Standard CIP-008-3; and Standard CIP- |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | and Standard CIP- 009-3. | and Standard CIP- 009-3. | and Standard CIP- 009-3. | 009-3. |
| CIP-005-3 | R1.6. | The Responsible Entity shall maintain documentation of Electronic Security Perimeter(s), all interconnected Critical and non-critical Cyber Assets within the Electronic Security Perimeter(s), all electronic access points to the Electronic Security Perimeter(s) and the Cyber Assets deployed for the access control and monitoring of these access points. | N/A | N/A | N/A | The Responsible Entity did not maintain documentation of one or more of the following: Electronic Security Perimeter(s), interconnected Critical and noncritical Cyber Assets within the Electronic Security Perimeter(s), electronic access points to the Electronic Security Perimeter(s) and Cyber Assets deployed for the access control and monitoring of these access points. |
| CIP-005-3 | R2. | Electronic Access Controls — The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not implement or did not document the organizational processes and technical and procedural mechanisms for |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | control of electronic access at all electronic access points to the Electronic Security Perimeter(s). |
| CIP-005-3 | R2.1. | These processes and mechanisms shall use an access control model that denies access by default, such that explicit access permissions must be specified. | N/A | N/A | N/A | The processes and mechanisms did not use an access control model that denies access by default, such that explicit access permissions must be specified. |
| CIP-005-3 | R2.2. | At all access points to the Electronic Security Perimeter(s), the Responsible Entity shall enable only ports and services required for operations and for monitoring Cyber Assets within the Electronic Security Perimeter, and shall document, individually or by specified grouping, the configuration of those ports and services. | N/A | N/A | N/A | At one or more access points to the Electronic Security Perimeter(s), the Responsible Entity enabled ports and services not required for operations and for monitoring Cyber Assets within the Electronic Security Perimeter, or did not document, individually or by specified grouping, the configuration of those ports and services. |
| CIP-005-3 | R2.3. | The Responsible Entity shall implement and maintain a | N/A | N/A | <u>N/A</u> The Responsible Entity did | The Responsible Entity did not |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | procedure for securing dial-up access to the Electronic Security Perimeter(s). | | | implement but did not maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s) where applicable. | implement n or maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s) where applicable. |
| CIP-005-3 | R2.4. | Where external interactive access into the Electronic Security Perimeter has been enabled, the Responsible Entity shall implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible. | N/A | N/A | N/A | Where external interactive access into the Electronic Security Perimeter has been enabled the Responsible Entity did not implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible. |
| CIP-005-3 | R2.5. | The required documentation shall, at least, identify and describe: | N/A | N/A | N/A | The required documentation for R2 did not include one or more of the elements described in R2.5.1 through R2.5.4. |
| CIP-005-3 | R2.5.1. | The processes for access request and authorization. | N/A | N/A | N/A | N/A |
| CIP-005-3 | R2.5.2. | The authentication methods. | N/A | N/A | N/A | N/A |
| CIP-005-3 | R2.5.3. | The review process for authorization rights, in accordance with Standard | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | CIP-004-3 Requirement R4. | | | | |
| CIP-005-3 | R2.5.4. | The controls used to secure dial-up accessible connections. | N/A | N/A | N/A | N/A |
| CIP-005-3 | R2.6. | Appropriate Use Banner — Where technically feasible, electronic access control devices shall display an appropriate use banner on the user screen upon all interactive access attempts. The Responsible Entity shall maintain a document identifying the content of the banner. | The Responsible Entity did not maintain a document identifying the content of the banner. OR Where technically feasible less than 5% electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. | Where technically feasible 5% but less than 10% of electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. | Where technically feasible 10% but less than 15% of electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. | Where technically feasible, 15% or more electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. |
| CIP-005-3 | R3. | Monitoring Electronic Access — The Responsible Entity shall implement and document an electronic or manual process(es) for monitoring and logging access at access points to the Electronic Security Perimeter(s) twenty-four hours a day, seven days a week. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document electronic or manual processes monitoring and logging access points. |
| CIP-005-3 | R3.1. | For dial-up accessible Critical Cyber Assets that use non-routable protocols, the Responsible Entity shall implement and document monitoring process(es) at each | N/A | N/A | N/A | Where technically feasible, the Responsible Entity did not implement or did not document |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | access point to the dial-up device, where technically feasible. | | | | electronic or manual processes for monitoring at one or more access points to dial-up devices. |
| CIP-005-3 | R3.2. | Where technically feasible, the security monitoring process(es) shall detect and alert for attempts at or actual unauthorized accesses. These alerts shall provide for appropriate notification to designated response personnel. Where alerting is not technically feasible, the Responsible Entity shall review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. | N/A | N/A | N/A | Where technically feasible, the Responsible Entity did not implement security monitoring process(es) to detect and alert for attempts at or actual unauthorized accesses. OR The above alerts do not provide for appropriate notification to designated response personnel. OR Where alerting is not technically feasible, the Responsible Entity did not review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-005-3 | R4. | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of the electronic access points to the Electronic Security Perimeter(s) at least annually. The vulnerability assessment shall include, at a minimum, the following: | N/A | N/A | N/A | The Responsible Entity did not perform a Vulnerability Assessment at least annually for one or more of the access points to the Electronic Security Perimeter(s). OR The vulnerability assessment did not include one (1) or more of the subrequirements R4.1, R4.2, R4.3, R4.4, R4.5. |
| CIP-005-3 | R4.1. | A document identifying the vulnerability assessment process; | N/A | N/A | N/A | N/A |
| CIP-005-3 | R4.2. | A review to verify that only ports and services required for operations at these access points are enabled; | N/A | N/A | N/A | N/A |
| CIP-005-3 | R4.3. | The discovery of all access points to the Electronic Security Perimeter; | N/A | N/A | N/A | N/A |
| CIP-005-3 | R4.4. | A review of controls for default accounts, passwords, and network management community strings; | N/A | N/A | N/A | N/A |
| CIP-005-3 | R4.5. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-005-3 | R5. | Documentation Review and Maintenance — The Responsible Entity shall review, update, and maintain all documentation to support compliance with the requirements of Standard CIP-005-3. | The Responsible Entity did not review, update, and maintain at least one but less than or equal to 5% of the documentation to support compliance with the requirements of Standard CIP-005. | The Responsible Entity did not review, update, and maintain greater than 5% but less than or equal to 10% of the documentation to support compliance with the requirements of Standard CIP-005. | The Responsible Entity did not review, update, and maintain greater than 10% but less than or equal to 15% of the documentation to support compliance with the requirements of Standard CIP-005. | The Responsible Entity did not review, update, and maintain greater than 15% of the documentation to support compliance with the requirements of Standard CIP-005. |
| CIP-005-3 | R5.1. | The Responsible Entity shall ensure that all documentation required by Standard CIP-005-2 reflect current configurations and processes and shall review the documents and procedures referenced in Standard CIP-005-3 at least annually. | N/A | The Responsible Entity did not provide evidence of an annual review of the documents and procedures referenced in Standard CIP-005. | The Responsible Entity did not document current configurations and processes referenced in Standard CIP-005. | The Responsible Entity did not document current configurations and processes and did not review the documents and procedures referenced in Standard CIP-005 at least annually. |
| CIP-005-3 | R5.2. | The Responsible Entity shall update the documentation to reflect the modification of the network or controls within ninety calendar days of the change. | N/A | N/A | N/A | The Responsible Entity did not update documentation to reflect a modification of the network or controls within ninety calendar days of the change. |
| CIP-005-3 | R5.3. | The Responsible Entity shall retain electronic access logs for at least ninety calendar days. Logs related to | The Responsible Entity retained | The Responsible Entity retained | The Responsible Entity retained | The Responsible Entity |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-3. | electronic access logs for 75 or more calendar days, but for less than 90 calendar days. | electronic access logs for 60 or more calendar days, but for less than 75 calendar days. | electronic access logs for 45 or more calendar days , but for less than 60 calendar days. | retained electronic access logs for less than 45 calendar days. |
| CIP-006-3a | R1. | Physical Security Plan — The Responsible Entity shall document, implement, and maintain a physical security plan, approved by the senior manager or delegate(s) that shall address, at a minimum, the following: | N/A | N/A | The Responsible Entity created a physical security plan but did not gain approval by a senior manager or delegate(s). OR The Responsible Entity created and implemented but did not maintain a physical security plan. | The Responsible Entity did not document, implement, and maintain a physical security plan. |
| CIP-006-3a | R1.1. | All Cyber Assets within an Electronic Security Perimeter shall reside within an identified Physical Security Perimeter. Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity shall deploy and document alternative measures to control physical access to such Cyber Assets. | N/A | N/AWhere a completely enclosed ("six-wall") border cannot be established, the Responsible Entity has deployed but not documented alternative measures to control physical access to such Cyber Assets within the Electronic Security Perimeter. | <u>N/A</u> Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity has not deployed alternative measures to control physical access to such Cyber Assets within the Electronic Security Perimeter. | The Responsible Entity's physical security plan does not include processes to ensure and document that all Cyber Assets within an Electronic Security Perimeter also reside within an identified Physical Security Perimeter. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity has not deployed and-or_documented alternative measures to control physical access to the Critical s such Cyber Assets within the Electronic Security Perimeter. |
| CIP-006-3a | R1.2. | Identification of all physical access points through each Physical Security Perimeter and measures to control entry at those access points. | N/A | <u>N/A</u> The Responsible Entity's physical security plan includes measures to control entry at access points but does not identify all access points through each Physical Security Perimeter. | <u>N/A</u> The Responsible Entity's physical security identifies all access points through each Physical Security Perimeter but does not identify measures to control entry at those access points. | The Responsible Entity's physical security plan does not identify all access points through each Physical Security Perimeter nor does not identify measures to control entry at those access points. |
| CIP-006-3a | R1.3 | Processes, tools, and procedures to monitor physical access to the perimeter(s). | N/A | N/A | N/A | The Responsible Entity's physical security plan does not include processes, tools, and procedures to monitor physical access to the perimeter(s). |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-006-3a | R1.4 | Appropriate use of physical access controls as described in Requirement R4 including visitor pass management, response to loss, and prohibition of inappropriate use of physical access controls. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not address the appropriate use of physical access controls as described in Requirement R4. |
| CIP-006-3a | R1.5 | Review of access authorization requests and revocation of access authorization, in accordance with CIP-004-3 Requirement R4. | N/A | N/A | N/AThe Responsible Entity's physical security plan does not address either the process for reviewing access authorization requests or the process for revocation of access authorization, in accordance with CIP-004-3 Requirement R4. | The Responsible Entity's physical security plan does not address the process for reviewing of access authorization requests and or the process for revocation of access authorization, in accordance with CIP-004-3 Requirement R4. |
| CIP-006-3a | R1.6 | A visitor control program for visitors (personnel without authorized unescorted access to a Physical Security Perimeter), containing at a minimum the following: | <u>N/A</u> The responsible Entity included a visitor control program in its physical security plan, but either did not log the visitor entrance or did not log the visitor exit from the Physical Security Perimeter. | The responsible Entity included a visitor control program in its physical security plan, but either did not log the visitor or did not log the escort. <u>N/A</u> | <u>N/A</u> The responsible Entity included a visitor control program in its physical security plan, but either did not log the visitor or did not log the escort. | The Responsible Entity did not include or implement a visitor control program in its physical security plan or it does not meet the requirements of continuous escort |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-006-3a | R1.6.1 | Logs (manual or automated) to document the entry and exit of visitors, including the date and time, to and from Physical Security Perimeters. | <u>N/A</u> | N/A | <u>N/A</u> | <u>N/A</u> |
| CIP-006-3a | R1.6.2 | Continuous escorted access of visitors within the Physical Security Perimeter | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> |
| CIP-006-3a | R1.7 | Update of the physical security plan within thirty calendar days of the completion of any physical security system redesign or reconfiguration, including, but not limited to, addition or removal of access points through the Physical Security Perimeter, physical access controls, monitoring controls, or logging controls. | N/A | N/A | <u>N/AThe Responsible</u> Entity's physical security plan addresses a process for updating the physical security plan within thirty calendar days of the completion of any physical security system redesign or reconfiguration but the plan was not updated within thirty calendar days of the completion of a physical security system redesign or reconfiguration. | The Responsible Entity's physical security plan does not address a process for updating the physical security plan within-thirty calendar days of the completion of a physical security system redesign or within thirty calendar days of the completion of a reconfiguration. OR The plan was not updated within thirty calendar days of the completion of a physical security system redesign or reconfiguration |
| CIP-006-3a | R1.8 | Annual review of the physical | N/A | N/A | N/A | The Responsible |

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| | | security plan. | | | | Entity's physical security plan does not address a process for ensuring that the physical security plan is reviewed at least annually. |
| CIP-006-3a | R2 | Protection of Physical Access Control Systems — Cyber Assets that authorize and/or log access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers, shall: | N/AA Cyber Asset that authorizes and/or logs access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers was provided with all but one (1) of the protective measures specified in Standard CIP-004-3 Requirement R3; Standard CIP 005-3 Requirements R2 and R3; Standard CIP-006-3a Requirements R4 and R5; Standard | N/AA Cyber Asset that authorizes and/or logs access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers was provided with all but two (2) of the protective measures specified in Standard CIP-003- 3; Standard CIP-004- 3 Requirement R3; Standard CIP-004- 3 Requirements R2 and R3; Standard CIP-006 3a Requirements R4 and R5; Standard | A <u>N/A</u> -Cyber Asset that authorizes and/or logs access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers was provided with all but three (3) of the protective measures specified in Standard CIP-003- 3; Standard CIP-004- 3 Requirement R3; Standard CIP-004- 3 Requirements R2 and R3; Standard CIP-006-3a Requirements R4 and R5; Standard | A Cyber Asset that authorizes and/or logs access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers, was not protected from unauthorized physical access. OR A Cyber Asset that authorizes and/or logs access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | Standard CIP-009-3. | Standard CIP-009- 3. | Standard CIP-009- 3. | point such as electronic lock control mechanisms and badge readers was provided without-not afforded four (4) or more of the protective measures specified in Standard CIP-003-3; Standard CIP-004-3 Requirement R3; Standard CIP- 005-3 Requirements R2 and R3; Standard CIP-006-3a Requirements R4 and R5; Standard CIP-007-3; Standard CIP-007-3; Standard CIP-008-3; and Standard CIP-009-3. |
| CIP-006-3a | R2.1. | Be protected from unauthorized physical access. | N/A | N/A | N/A | N/A |
| CIP-006-3a | R2.2. | Be afforded the protective measures specified in Standard CIP-003-3; Standard CIP-004-3 Requirement R3; Standard CIP-005-3 Requirements R2 and R3; Standard CIP-006-3a Requirements R4 and R5; Standard CIP-007-3; Standard CIP-008-3; and Standard CIP-009-3. | N/A | N/A | N/A | N/A |
| CIP-006-3a | R3 | Protection of Electronic Access Control Systems — Cyber Assets used in the access control and/or monitoring of the Electronic Security | N/A | N/A | N/A | A Cyber Assets used in the access control and/or monitoring of the Electronic |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | Perimeter(s) shall reside within an identified Physical Security Perimeter. | | | | Security Perimeter(s) did <u>does</u> not reside within an identified Physical Security Perimeter. |
| CIP-006-3a | R4 | Physical Access Controls — The Responsible Entity shall document and implement the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. The Responsible Entity shall implement one or more of the following physical access methods: Card Key: A means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from one perimeter to another. Special Locks: These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. Security Personnel: Personnel responsible for controlling physical access who may reside on-site or at a monitoring station. Other Authentication | N/A | N/AThe Responsible Entity has implemented but not documented the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty- four hours a day, seven days a week using one or more of the following physical access methods: • Card Key: A means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from one perimeter to another. • Special Locks: These include, but are not limited to, | N/AThe Responsible Entity has documented but not implemented the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty- four hours a day, seven days a week using one or more of the following physical access methods: • Card Key: -A means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from one perimeter to another. • Special Locks: These include, but are not limited to, | The Responsible Entity has not documented nor has not implemented the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty- four hours a day, seven days a week using one or more of the following physical access methods: • Card Key: A means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from one perimeter to another. • Special Locks: These include, but are not limited to, |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | Devices: Biometric, keypad, | | locks with | locks with | locks with |
| | | token, or other equivalent | | "restricted key" | "restricted key" | "restricted key" |
| | | devices that control physical | | systems, magnetic | systems, magnetic | systems, magnetic |
| | | access to the Critical Cyber | | locks that can be | locks that can be | locks that can be |
| | | Assets | | operated remotely, | operated remotely, | operated remotely, |
| | | | | and "man-trap" | and "man-trap" | and "man-trap" |
| | | | | systems. | systems. | systems. |
| | | | | Security | Security | Security |
| | | | | Personnel: | Personnel: | Personnel: |
| | | | | Personnel | Personnel | Personnel |
| | | | | responsible for | responsible for | responsible for |
| | | | | controlling physical | controlling physical | controlling physical |
| | | | | access who may | access who may | access who may |
| | | | | reside on-site or at a | reside on-site or at a | reside on-site or at a |
| | | | | monitoring station. | monitoring station. | monitoring station. |
| | | | | Other | Other | • Other |
| | | | | Authentication | Authentication | Authentication |
| | | | | Devices: Biometric, | Devices: Biometric, | Devices: Biometric, |
| | | | | keypad, token, or | keypad, token, or | keypad, token, or |
| | | | | other equivalent | other equivalent | other equivalent |
| | | | | devices that control | devices that control | devices that control |
| | | | | physical access to | physical access to | physical access to |
| | | | | the Critical Cyber | the Critical Cyber | the Critical Cyber |
| | | | | Assets. | Assets. | Assets. |
| CIP-006-3a | R5 | Monitoring Physical Access — The | N/A | N/AThe Responsible | N/AThe Responsible | The Responsible |
| | | Responsible Entity shall document | , | Entity has | Entity has | Entity has not |
| | | and implement the technical and | | implemented but | documented but | documented n or |
| | | procedural controls for monitoring | | not documented the | not implemented | <u>has not</u> |
| | | physical access at all access points to | | technical and | the technical and | implemented |
| | | the Physical Security Perimeter(s) | | procedural controls | procedural controls | the technical and |
| | | twenty-four hours a day, seven days | | for monitoring | for monitoring | procedural |
| | | a week. Unauthorized access | | physical access at all | physical access at all | controls for |
| | | attempts shall be reviewed | | access points | access points | monitoring physical |
| | | immediately and handled in | | to the Physical | to the Physical | access at all access |
| | | accordance with the procedures | | Security | Security | points to the |
| | | specified in Requirement CIP-008-3. | | Perimeter(s) twenty- | Perimeter(s) twenty- | Physical Security |
| | | One or more of the following | | four hours a | four hours a | Perimeter(s) |

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| | Monitoring methods shall be used: Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel responsible for response. Human Observation of Access Points: Monitoring of physical access points by authorized personnel as specified in Requirement R4. | | day, seven days a week-using one or more of the following monitoring methods: • Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel responsible for response. • Human Observation of Access Points: Monitoring of physical access points by authorized personnel as specified in Requirement R4. | day, seven days a week using one or more of the following monitoring methods: • Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel responsible for response. • Human Observation of Access Points: Monitoring of physical access points by authorized personnel as specified in Requirement R4. | twenty-four hours a day, seven days a week using one or more of the following monitoring methods: • Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel responsible for response. • Human Observation of Access Points: Monitoring of physical access points by authorized personnel as specified in Requirement R4. OR An unauthorized access attempt was not reviewed immediately and handled in |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | accordance with |
| | | | | | | CIP- |
| | | | | | | 008-3. |
| CIP-006-3a | R6 | Logging Physical Access — Logging shall record sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. The Responsible Entity shall implement and document the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method. Video Recording: Electronic capture of video images of sufficient quality to determine identity. Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor | The Responsible Entity has implemented but not documented the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: • Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method, • Video Recording: Electronic capture of video images of sufficient quality to | N/AThe Responsible Entity has implemented the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: - Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method, - Video Recording: Electronic capture of video images of sufficient quality to determine identity, | N/AThe Responsible Entity has documented but not implemented the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: • Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method, • Video Recording: Electronic capture of video images of sufficient quality to | The Responsible Entity has not implemented nor has not documented the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: • Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method, • Video Recording: Electronic capture of video images of |
| | | physical access as specified | determine identity, or | • Manual Logging: A | determine identity, or | sufficient quality to determine identity, |
| | | in Requirement R4 | Manual Logging: A | log book or sign-in | Manual Logging: A | or |
| | | | log book or sign-in | sheet, or other | log book or sign-in | Manual Logging: A |
| | | | sheet, or other | record of physical | sheet, or other | log book or sign-in |
| | | | record of physical | access maintained | record of physical | sheet, or other |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4, and has provided logging that records sufficient information to uniquely identify individuals and the time of access twenty four hours a day, seven days a week. | by security or other personnel authorized to control and monitor physical access as specified in Requirement R4, but has not provided logging that records sufficient information to uniquely identify individuals and the time of access twenty four hours a day, seven days a week. | access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4. | record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4. OR <u>The Responsible Entity has not</u> recorded sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. |
| CIP-006-3a | R7 | Access Log Retention — The responsible entity shall retain physical access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-3. | <u>N/A</u> The Responsible Entity retained physical access logs for 75 or more calendar days, but for less than 90 calendar days. | <u>N/A</u> The Responsible Entity retained physical access logs for 60 or more calendar days, but for less than 75 calendar days. | <u>N/A</u> The Responsible Entity retained physical access logs for 45 or more calendar days, but for less than 60 calendar days. | The ResponsibleEntity retainedphysical access logsfor less than 45calendar days. Theresponsible entitydid not retainphysical access logsfor at least ninetycalendar days. |
| CIP-006-3a | R8 | Maintenance and Testing — The Responsible Entity shall implement a maintenance and testing program to ensure that all physical security | <u>N/A</u> The Responsible Entity has implemented a maintenance and | <u>N/A</u> The Responsible Entity has implemented a maintenance and | <u>N/A</u> The Responsible Entity has implemented a maintenance and | The Responsible Entity has not implemented a maintenance and |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | systems under Requirements R4, R5, and R6 function properly. The program must include, at a minimum, the following: | testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly but the program does not include one of the Requirements R8.1, R8.2, and R8.3. | testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly but the program does not include two of the Requirements R8.1, R8.2, and R8.3. | testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly but the program does not include any of the Requirements R8.1, R8.2, and R8.3. | testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly. OR <u>The implemented</u> program does not include one or more of the requirements; R8.1, R8.2, and R8.3. |
| CIP-006-3a | R8.1 | Testing and maintenance of all physical security mechanisms on a cycle no longer than three years. | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> |
| CIP-006-3a | R8.2 | Retention of testing and maintenance records for the cycle determined by the Responsible Entity in Requirement R8.1. | <u>N/A</u> | <u>N/A</u> | N/A | <u>N/A</u> |
| CIP-006-3a | R8.3 | Retention of outage records regarding access controls, logging, and monitoring for a minimum of one calendar year. | <u>N/A</u> | N/A | N/A | <u>_N/A</u> |
| CIP-007-3 | R1. | Test Procedures — The Responsible Entity shall ensure that new Cyber Assets and significant changes to existing Cyber Assets within the Electronic Security Perimeter do not adversely affect existing cyber security controls. For purposes of Standard CIP-007-3, a significant change shall, at a minimum, include | N/A | N/A | N/A | The Responsible Entity did not ensure the prevention of adverse affects described in R1, by not including the required minimum significant changes. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | implementation of security patches, cumulative service packs, vendor releases, and version upgrades of operating systems, applications, database platforms, or other third- party software or firmware. | | | | OR The Responsible Entity did not address one or more of the following: R1.1, R1.2, R1.3. |
| CIP-007-3 | R1.1. | The Responsible Entity shall create, implement, and maintain cyber security test procedures in a manner that minimizes adverse effects on the production system or its operation. | N/A | N/A | N/A | N/A |
| CIP-007-3 | R1.2. | The Responsible Entity shall document that testing is performed in a manner that reflects the production environment. | N/A | N/A | N/A | N/A |
| CIP-007-3 | R1.3. | The Responsible Entity shall document test results. | N/A | N/A | N/A | N/A |
| CIP-007-3 | R2. | Ports and Services — The Responsible Entity shall establish, document and implement a process to ensure that only those ports and services required for normal and emergency operations are enabled. | N/A | <u>N/A</u> The Responsible Entity established (implemented) but did not document a process to ensure that only those ports and services required for normal and emergency operations are enabled. | <u>N/A</u> The Responsible Entity documented but did not establish (implement) a process to ensure that only those ports and services required for normal and emergency operations are enabled. | The Responsible Entity did not establish (implement) n or <u>did</u> <u>not</u> document a process to ensure that only those ports and services required for normal and emergency operations are enabled. |
| CIP-007-3 | R2.1. | The Responsible Entity shall enable only those ports and services required for normal and emergency operations. | N/A | N/A | N/A | The Responsible Entity enabled one or more ports or services not required for normal |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | and emergency operations on Cyber Assets inside the Electronic Security Perimeter(s). |
| CIP-007-3 | R2.2. | The Responsible Entity shall disable other ports and services, including those used for testing purposes, prior to production use of all Cyber Assets inside the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not disable one or more other ports or services, including those used for testing purposes, prior to production use for Cyber Assets inside the Electronic Security Perimeter(s). |
| CIP-007-3 | R2.3. | In the case where unused ports and services cannot be disabled due to technical limitations, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | N/A | N/A | N/A | For cases where unused ports and services cannot be disabled due to technical limitations, the Responsible Entity did not document compensating measure(s) applied to mitigate risk <u>.</u> exposure or state an acceptance of risk. |
| CIP-007-3 | R3. | Security Patch Management — The Responsible Entity, either separately or as a component of the documented configuration management process specified in CIP-003-3 Requirement R6, shall | <u>N/A</u> The Responsible Entity established (implemented) and documented, either separately or as a component of | <u>N/A</u> The Responsible Entity established (implemented) but did not document, either separately or as a component of | <u>N/A</u> The Responsible Entity documented but did not establish (implement), either separately or as a | The Responsible Entity did not establish (implement) n or <u>did</u> <u>not</u> document, either separately or |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | establish, document and implement a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | the documented configuration management process specified in CIP-003-3 Requirement R6, a security patch management program but did not include one or more of the following: tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | the documented configuration management process specified in CIP-003-3 Requirement R6, a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | component of the documented configuration management process specified in CIP 003-3 Requirement R6, a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | as a component of the documented configuration management process specified in CIP-003-3 Requirement R6, a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). |
| CIP-007-3 | R3.1. | The Responsible Entity shall document the assessment of security patches and security upgrades for applicability within thirty calendar days of availability of the patches or upgrades. | N/A | N/A | N/A | The Responsible Entity did not document the assessment of security patches and security upgrades for applicability as required in Requirement R3 within 30 calendar days after the availability of the patches and upgrades. |
| CIP-007-3 | R3.2. | The Responsible Entity shall document the implementation of | N/A | N/A | N/A | The Responsible Entity did not |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | security patches. In any case where the patch is not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | | | | document the implementation of applicable security patches as required in R3. OR Where an applicable patch was not installed, the Responsible Entity did not document the compensating measure(s) applied to mitigate risk. exposure or an acceptance of risk. |
| CIP-007-3 | R4. | Malicious Software Prevention — The Responsible Entity shall use anti- virus software and other malicious software ("malware") prevention tools, where technically feasible, to detect, prevent, deter, and mitigate the introduction, exposure, and propagation of malware on all Cyber Assets within the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity, where technically feasible, did not use anti- virus software or other malicious software ("malware") prevention tools, on <u>one</u> or more Cyber Assets within the Electronic Security Perimeter(s). |
| CIP-007-3 | R4.1. | The Responsible Entity shall document and implement anti-virus and malware prevention tools. In the case where anti-virus software and malware prevention tools are not installed, the Responsible Entity shall document compensating measure(s) | N/A | N/A | N/A | The Responsible Entity did not document the implementation of antivirus and malware prevention tools for cyber |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | applied to mitigate risk exposure. | | | | assets within the electronic security perimeter. OR The Responsible Entity did not document the implementation of compensating measure(s) applied to mitigate risk exposure where antivirus and malware prevention tools are not |
| CIP-007-3 | R4.2. | The Responsible Entity shall document and implement a process for the update of anti-virus and malware prevention "signatures." The process must address testing and installing the signatures. | N/A | N/A | N/A | installed. The Responsible Entity did not document or did not implement a process including addressing testing and installing the signatures for the update of anti-virus and malware prevention "signatures." |
| CIP-007-3 | R5. | Account Management — The Responsible Entity shall establish, implement, and document technical and procedural controls that enforce access authentication of, and accountability for, all user activity, | N/A | N/A | N/A | The Responsible Entity did not document or did not implement technical and procedural controls that |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | and that minimize the risk of unauthorized system access. | | | | enforce access authentication of, and accountability for, all user activity. |
| CIP-007-3 | R5.1. | The Responsible Entity shall ensure that individual and shared system accounts and authorized access permissions are consistent with the concept of "need to know" with respect to work functions performed. | N/A | N/A | N/A | The Responsible Entity did not ensure that individual and shared system accounts and authorized access permissions are consistent with the concept of "need to know" with respect to work functions performed. |
| CIP-007-3 | R5.1.1. | The Responsible Entity shall ensure that user accounts are implemented as approved by designated personnel. Refer to Standard CIP- 003-3 Requirement R5. | N/A | N/A | N/A | One or more user accounts implemented by the Responsible Entity were not implemented as approved by designated personnel. |
| CIP-007-3 | R5.1.2. | The Responsible Entity shall establish methods, processes, and procedures that generate logs of sufficient detail to create historical audit trails of individual user account access activity for a minimum of ninety days. | N/A | The Responsible Entity generated logs with sufficient detail to create historical audit trails of individual user account access activity, however the logs do not contain activity for a minimum of 90 | The Responsible Entity generated logs with insufficient detail to create historical audit trails of individual user account access activity. | The Responsible Entity did not generate logs of individual user account access activity. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-007-3 | R5.1.3. | The Responsible Entity shall review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003-3 Requirement R5 and Standard CIP- 004-3 Requirement R4. | N/A | days. N/A | N/A | The Responsible Entity did not review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003-3 Requirement R5 and Standard CIP-004-3 |
| CIP-007-3 | R5.2. | The Responsible Entity shall implement a policy to minimize and manage the scope and acceptable use of administrator, shared, and other generic account privileges including factory default accounts. | N/A | N/A | N/A | Requirement R4. The Responsible Entity did not implement a policy to minimize and manage the scope and acceptable use of administrator, shared, and other generic account privileges including factory default accounts. |
| CIP-007-3 | R5.2.1. | The policy shall include the removal, disabling, or renaming of such accounts where possible. For such accounts that must remain enabled, passwords shall be changed prior to putting any system into service. | N/A | N/A | The Responsible Entity's policy did not include the removal, disabling, or renaming of such accounts where possible, however for accounts that must remain enabled, passwords were changed prior | For accounts that must remain enabled, the Responsible Entity did not change passwords prior to putting any system into service. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | to putting any system into service. | |
| CIP-007-3 | R5.2.2. | The Responsible Entity shall identify those individuals with access to shared accounts. | N/A | N/A | N/A | The Responsible Entity did not identify all individuals with access to shared accounts. |
| CIP-007-3 | R5.2.3. | Where such accounts must be shared, the Responsible Entity shall have a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps for securing the account in the event of personnel changes (for example, change in assignment or termination). | N/A | N/A | N/A | Where such accounts must be shared, the Responsible Entity has not implemented (one or more components of) a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps for securing the account in the event of personnel changes (for example, change in assignment or termination). |
| CIP-007-3 | R5.3. | At a minimum, the Responsible Entity shall require and use passwords, subject to the following, as technically feasible: | N/A | N/A | N/A | The Responsible Entity does not require passwords subject to R5.3.1, |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | R5.3.2, R5.3.3. OR Does not use passwords subject to R5.3.1, R5.3.2, R5.3.3. |
| CIP-007-3 | R5.3.1. | Each password shall be a minimum of six characters. | N/A | N/A | N/A | N/A |
| CIP-007-3 | R5.3.2. | Each password shall consist of a combination of alpha, numeric, and "special" characters. | N/A | N/A | N/A | N/A |
| CIP-007-3 | R5.3.3. | Each password shall be changed at least annually, or more frequently based on risk. | N/A | N/A | N/A | N/A |
| CIP-007-3 | R6. | Security Status Monitoring — The Responsible Entity shall ensure that all Cyber Assets within the Electronic Security Perimeter, as technically feasible, implement automated tools or organizational process controls to monitor system events that are related to cyber security. | N/A | N/A | N/A | The Responsible Entity as technically feasible, did not implement automated tools or organizational process controls, to monitor system events that are related to cyber security on one or more of Cyber Assets inside the Electronic Security Perimeter(s). |
| CIP-007-3 | R6.1. | The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets | N/A | N/A | N/A | The Responsible Entity did not implement or did not document the organizational processes and |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | within the Electronic Security Perimeter. | | | | technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter. |
| CIP-007-3 | R6.2. | The security monitoring controls shall issue automated or manual alerts for detected Cyber Security Incidents. | N/A | N/A | N/A | The Responsible entity's security monitoring controls do not issue automated or manual alerts for detected Cyber Security Incidents. |
| CIP-007-3 | R6.3. | The Responsible Entity shall maintain logs of system events related to cyber security, where technically feasible, to support incident response as required in Standard CIP-008-3. | N/A | N/A | N/A | The Responsible Entity did not maintain logs of system events related to cyber security, where technically feasible, to support incident response as required in Standard CIP-008. |
| CIP-007-3 | R6.4. | The Responsible Entity shall retain all logs specified in Requirement R6 for ninety calendar days. | N/A | N/A | N/A | The Responsible Entity did not retain one or more of the logs specified in Requirement R6 for at least 90 calendar days. |
| CIP-007-3 | R6.5. | The Responsible Entity shall review | N/A | N/A | N/A | The Responsible |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | logs of system events related to cyber security and maintain records documenting review of logs. | | | | Entity did not review logs of system events related to cyber security nor maintain records documenting review of logs. |
| CIP-007-3 | R7. | Disposal or Redeployment — The Responsible Entity shall establish and implement formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-3. | <u>N/A</u> The Responsible Entity established and implemented formal methods, processes, and procedures for disposal and redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP- 005-3 but did not maintain records as specified in R7.3. | <u>N/A</u> The Responsible Entity established and implemented formal methods, processes, and procedures for disposal of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-3 but did not address redeployment as specified in R7.2. | The Responsible Entity established and implemented formal methods, processes, and procedures for redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005- 3 but did not address disposal redeployment as specified in R7.21. | The Responsible Entity did not establish or implement formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-3. OR The Responsible Entity established formal methods, processes, and procedures for redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | Standard CIP-005-2but did not addressdisposal as specifiedin R7.1.ORThe ResponsibleEntity did notmaintain recordspertaining todisposal or[³]redeployment as |
| CIP-007-3 | R7.1. | Prior to the disposal of such assets, the Responsible Entity shall destroy or erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | N/A | N/A | N/A | <u>specified in R7.3.</u> N/A |
| CIP-007-3 | R7.2. | Prior to redeployment of such assets, the Responsible Entity shall, at a minimum, erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | N/A | N/A | N/A | N/A |
| CIP-007-3 | R7.3. | The Responsible Entity shall maintain records that such assets were disposed of or redeployed in accordance with documented procedures. | N/A | N/A | N/A | N/A |
| CIP-007-3 | R8 | Cyber Vulnerability Assessment — | N/A | N/A | N/A | The Responsible |

³ Please note that FERC's January 20, 2011 Order on Version 2 And Version 3 Violation Risk Factors And Violation Severity Levels For Critical Infrastructure Protection Reliability Standards dictated that this should read "…records pertaining to disposal **of** redeployment as specified in R7.3." (Emphasis added) It has come to NERC's attention that it should read "…records pertaining to disposal **or** redeployment as specified in R7.3." (emphasis added) and NERC has made this change accordingly. NERC proposes to remove this footnote from the final approved list of VSLs.

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | The Responsible Entity shall perform a cyber vulnerability assessment of all Cyber Assets within the Electronic Security Perimeter at least annually. The vulnerability assessment shall include, at a minimum, the following: | | | | Entity did not perform a Vulnerability Assessment on one or more Cyber Assets within the Electronic Security Perimeter at least annually. OR The vulnerability assessment did not include one (1) or more of the subrequirements 8.1, 8.2, 8.3, 8.4. |
| CIP-007-3 | R8.1. | A document identifying the vulnerability assessment process; | N/A | N/A | N/A | N/A |
| CIP-007-3 | R8.2. | A review to verify that only ports and services required for operation of the Cyber Assets within the Electronic Security Perimeter are enabled; | N/A | N/A | N/A | N/A |
| CIP-007-3 | R8.3. | A review of controls for default accounts; and, | N/A | N/A | N/A | N/A |
| CIP-007-3 | R8.4. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | N/A | N/A | N/A | N/A |
| CIP-007-3 | R9 | Documentation Review and Maintenance — The Responsible Entity shall review and update the documentation specified in Standard CIP-007-3 at least annually. Changes | N/A | N/A | The Responsible Entity did not review and update the documentation specified in | The Responsible Entity did not review and update the documentation specified in |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | resulting from modifications to the systems or controls shall be documented within thirty calendar days of the change being completed. | | | Standard CIP-007-3 at least annually. OR The Responsible Entity did not document changes resulting from modifications to the systems or controls within thirty calendar days of the change being completed. | Standard CIP-007-3 at least annually nor and_were-changes resulting from modifications to the systems or controls were not documented within thirty calendar days of the change being completed. |
| CIP-008-3 | R1. | Cyber Security Incident Response Plan — The Responsible Entity shall develop and maintain a Cyber Security Incident response plan and implement the plan in response to Cyber Security Incidents. The Cyber Security Incident response plan shall address, at a minimum, the following: | N/A | <u>N/A</u> The Responsible Entity has developed but not maintained a Cyber Security Incident response plan. | The Responsible Entity has developed a Cyber Security Incident response plan but the planthat addresses all of the components required by R1.1 through R1.6 but has not maintained the plan in accordance with those components. does not address one or more of the subrequirements R1.1 through R1.6. | The Responsible Entity has not developed a Cyber Security Incident response plan <u>that</u> addresses all of the <u>components</u> <u>required by R1.1</u> <u>through R1.6</u> , or has not implemented the plan in response to a Cyber Security Incident. |
| CIP-008-3 | R1.1. | Procedures to characterize and classify events as reportable Cyber Security Incidents. | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-008-3 | R1.2. | Response actions, including roles and responsibilities of Cyber Security Incident response teams, Cyber Security Incident handling procedures, and communication plans. | N/A | N/A | N/A | N/A |
| CIP-008-3 | R1.3. | Process for reporting Cyber Security Incidents to the Electricity Sector Information Sharing and Analysis Center (ES- ISAC). The Responsible Entity must ensure that all reportable Cyber Security Incidents are reported to the ES-ISAC either directly or through an intermediary. | N/A | N/A | N/A | N/A |
| CIP-008-3 | R1.4. | Process for updating the Cyber Security Incident response plan within thirty calendar days of any changes. | N/A | N/A | N/A | N/A |
| CIP-008-3 | R1.5. | Process for ensuring that the Cyber Security Incident response plan is reviewed at least annually. | N/A | N/A | N/A | N/A |
| CIP-008-3 | R1.6. | Process for ensuring the Cyber Security Incident response plan is tested at least annually. A test of the Cyber Security Incident response plan can range from a paper drill, to a full operational exercise, to the response to an actual incident. | N/A | N/A | N/A | N/A |
| CIP-008-3 | R2 | Cyber Security Incident Documentation — The Responsible Entity shall keep relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 for three calendar years. | N/A | N/A | N/A | The Responsible Entity has not kept relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|--|--|--|---|
| | | | | | | for at least three calendar years. |
| CIP-009-3 | R1 | Recovery Plans — The Responsible Entity shall create and annually review recovery plan(s) for Critical Cyber Assets. The recovery plan(s) shall address at a minimum the following: | N/A | N/A | N/A | The Responsible Entity has not created or has not annually reviewed their recovery plan(s) for Critical Cyber Assets OR has created a plan but did not address one or more of the requirements CIP- 009-1 R1.1 and R1.2. |
| CIP-009-3 | R1.1. | Specify the required actions in response to events or conditions of varying duration and severity that would activate the recovery plan(s). | N/A | N/A | N/A | N/A |
| CIP-009-3 | R1.2. | Define the roles and responsibilities of responders. | N/A | N/A | N/A | N/A |
| CIP-009-3 | R2 | Exercises — The recovery plan(s) shall be exercised at least annually. An exercise of the recovery plan(s) can range from a paper drill, to a full operational exercise, to recovery from an actual incident. | N/A | N/A | N/A | The Responsible Entity's recovery plan(s) have not been exercised at least annually. |
| CIP-009-3 | R3 | Change Control — Recovery plan(s) shall be updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. Updates shall be communicated to personnel responsible for the activation and implementation of the recovery | <u>N/AThe Responsible</u> Entity's recovery plan(s) have been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from | <u>N/AThe Responsible</u> Entity's recovery plan(s) have been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from | <u>N/AThe Responsible</u> Entity's recovery plan(s) have been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from | The Responsible Entity's recovery plan(s) have not been updated to reflect any changes or lessons learned as a result of an exercise or the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | plan(s) within thirty calendar days of the change being completed. | an actual incident but the updates were communicated to personnel responsible for the | an actual incident but the updates were communicated to personnel responsible for the | an actual incident but the updates were communicated to personnel responsible for the | recovery from an actual incident. OR |
| | | | responsible for the activation and implementation of the recovery plan(s) in more than30 but less than or equal to 120 calendar days of the change. | responsible for the activation and implementation of the recovery plan(s) in more than 120 but less than or equal to 150 calendar days of the change. | responsible for the activation and implementation of the recovery plan(s) in more than 150 but less than or equal to 180 calendar days of the change. | The Responsible Entity's recovery plan(s) have been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident but the updates were <u>not</u> communicated to personnel responsible for the activation and implementation of the recovery plan(s) <u>within thirty more</u> than 180-calendar days of the change. |
| CIP-009-3 | R4 | Backup and Restore — The recovery plan(s) shall include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. For example, backups may include spare electronic components or equipment, written documentation of configuration settings, tape backup, etc. | N/A | N/A | N/A | The Responsible Entity's recovery plan(s) do not include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-009-3 | R5 | Testing Backup Media — Information essential to recovery that is stored on backup media shall be tested at least annually to ensure that the information is available. Testing can be completed off site. | N/A | N/A | N/A | The Responsible Entity's information essential to recovery that is stored on backup media has not been tested at least annually to ensure that the information is available. |

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| CIP-002-3 | R1. | Critical Asset Identification Method — The Responsible Entity shall identify and document a risk-based assessment methodology to use to identify its Critical Assets. | MEDIUM |
| CIP-002-3 | R1.1 | The Responsible Entity shall maintain documentation describing its risk-based assessment methodology that includes procedures and evaluation criteria. | LOWER |
| CIP-002-3 | R1.2 | The risk-based assessment shall consider the following assets: | MEDIUM |
| CIP-002-3 | R1.2.1. | Control centers and backup control centers performing the functions of the entities listed in the Applicability section of this standard. | LOWER |
| CIP-002-3 | R1.2.2. | Transmission substations that support the reliable operation of the Bulk Electric System. | LOWER |
| CIP-002-3 | R1.2.3. | Generation resources that support the reliable operation of the Bulk Electric System. | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| CIP-002-3 | R1.2.4. | Systems and facilities critical to system restoration, including blackstart generators and substations in the electrical path of transmission lines used for initial system restoration. | LOWER |
| CIP-002-3 | R1.2.5. | Systems and facilities critical to automatic load shedding under a common control system capable of shedding 300 MW or more. | LOWER |
| CIP-002-3 | R1.2.6. | Special Protection Systems that support the reliable operation of the Bulk Electric System. | LOWER |
| CIP-002-3 | R1.2.7. | Any additional assets that support the reliable operation of the Bulk Electric System that the Responsible Entity deems appropriate to include in its assessment. | LOWER |
| CIP-002-3 | R2. | Critical Asset Identification — The Responsible Entity shall develop a list of its identified Critical Assets determined through an annual application of the risk-based assessment methodology required in R1. The Responsible Entity shall review this list at least annually, and update it as necessary. | HIGH |
| CIP-002-3 | R3. | Critical Cyber Asset Identification — Using the list of Critical Assets developed pursuant to Requirement R2, the Responsible Entity shall develop a list of associated Critical Cyber Assets essential to the operation of the Critical Asset. Examples at control centers and backup control centers include systems and facilities at master and remote sites that provide monitoring and control, automatic generation control, real-time power system modeling, and real-time inter-utility data exchange. The Responsible Entity shall review this list at least annually, and update it as necessary. For the purpose of Standard CIP- 002-3, Critical Cyber Assets are further qualified to be those having at least one of the following characteristics: | HIGH |
| CIP-002-3 | R3.1 | The Cyber Asset uses a routable protocol to communicate outside the Electronic Security Perimeter; or, | LOWER |
| CIP-002-3 | R3.2. | The Cyber Asset uses a routable protocol within a control center; or, | LOWER |
| CIP-002-3 | R3.3. | The Cyber Asset is dial-up accessible. | LOWER |
| CIP-002-3 | R4. | Annual Approval — The senior manager or delegate(s) shall approve annually the risk- based assessment methodology, the list of Critical Assets and the list of Critical Cyber Assets. Based on Requirements R1, R2, and R3 the Responsible Entity may determine that it has no Critical Assets or Critical Cyber Assets. The Responsible Entity shall keep a signed and dated record of the senior manager or delegate(s)'s approval of the risk- based assessment methodology, the list of Critical Assets and the list of Critical Cyber Assets (even if such lists are null.) | LOWER |
| CIP-003-3 | R1. | Cyber Security Policy — The Responsible Entity shall document and implement a cyber security policy that represents management's commitment and ability to secure its Critical Cyber Assets. The Responsible Entity shall, at minimum, ensure the following: | MEDIUM |
| CIP-003-3 | R1.1. | The cyber security policy addresses the requirements in Standards CIP-002-3 through | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|---------------------|
| Number | Number | CIP-009-3, including provision for emergency situations. | |
| CIP-003-3 | R1.2. | The cyber security policy is readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets. | LOWER |
| CIP-003-3 | R1.3 | Annual review and approval of the cyber security policy by the senior manager assigned pursuant to R2. | LOWER |
| CIP-003-3 | R2. | Leadership — The Responsible Entity shall assign a senior manager with overall responsibility for leading and managing the entity's implementation of, and adherence to, Standards CIP-002-3 through CIP-009-3. | LOWER <u>MEDIUM</u> |
| CIP-003-3 | R2.1. | The senior manager shall be identified by name, title, and date of designation. | LOWER |
| CIP-003-3 | R2.2. | Changes to the senior manager must be documented within thirty calendar days of the effective date. | LOWER |
| CIP-003-3 | R2.3. | Where allowed by Standards CIP-002-3 through CIP-009-3, the senior manager may delegate authority for specific actions to a named delegate or delegates. These delegations shall be documented in the same manner as R2.1 and R2.2, and approved by the senior manager. | LOWER |
| CIP-003-3 | R2.4 | The senior manager or delegate(s), shall authorize and document any exception from the requirements of the cyber security policy. | LOWER |
| CIP-003-3 | R3. | Exceptions — Instances where the Responsible Entity cannot conform to its cyber security policy must be documented as exceptions and authorized by the senior manager or delegate(s). | LOWER |
| CIP-003-3 | R3.1. | Exceptions to the Responsible Entity's cyber security policy must be documented within thirty days of being approved by the senior manager or delegate(s). | LOWER |
| CIP-003-3 | R3.2. | Documented exceptions to the cyber security policy must include an explanation as to why the exception is necessary and any compensating measures. | LOWER |
| CIP-003-3 | R3.3. | Authorized exceptions to the cyber security policy must be reviewed and approved annually by the senior manager or delegate(s) to ensure the exceptions are still required and valid. Such review and approval shall be documented. | LOWER |
| CIP-003-3 | R4. | Information Protection — The Responsible Entity shall implement and document a program to identify, classify, and protect information associated with Critical Cyber Assets. | MEDIUM |
| CIP-003-3 | R4.1. | The Critical Cyber Asset information to be protected shall include, at a minimum and regardless of media type, operational procedures, lists as required in Standard CIP-002-3, network topology or similar diagrams, floor plans of computing centers that contain Critical Cyber Assets, equipment layouts of Critical Cyber Assets, disaster recovery plans, incident response plans, and security configuration information. | MEDIUM |

| Standard | Requirement | Text of Requirement | VRF |
|-----------|-------------|--|---------|
| Number | Number | The Despensible Entity shall cleasify information to be protected under this program | |
| CIP-003-3 | R4.2. | The Responsible Entity shall classify information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. | LOWER |
| | | The Responsible Entity shall, at least annually, assess adherence to its Critical Cyber | LOWER |
| CIP-003-3 | R4.3. | Asset information protection program, document the assessment results, and implement | LOWER |
| | | an action plan to remediate deficiencies identified during the assessment. | |
| | R5. | Access Control — The Responsible Entity shall document and implement a program for | LOWER |
| CIP-003-3 | KO. | managing access to protected Critical Cyber Asset information. | 2011211 |
| CIP-003-3 | R5.1. | The Responsible Entity shall maintain a list of designated personnel who are responsible | LOWER |
| CIF-005-5 | NJ.1. | for authorizing logical or physical access to protected information. | |
| CIP-003-3 | R5.1.1. | Personnel shall be identified by name, title, and the information for which they are | LOWER |
| | N3.1.1. | responsible for authorizing access. | |
| CIP-003-3 | R5.1.2. | The list of personnel responsible for authorizing access to protected information shall be | LOWER |
| | | verified at least annually. | |
| CIP-003-3 | R5.2. | The Responsible Entity shall review at least annually the access privileges to protected | LOWER |
| | | information to confirm that access privileges are correct and that they correspond with | |
| | | the Responsible Entity's needs and appropriate personnel roles and responsibilities. | |
| CIP-003-3 | R5.3. | The Responsible Entity shall assess and document at least annually the processes for | LOWER |
| | | controlling access privileges to protected information. | |
| CIP-003-3 | R6. | Change Control and Configuration Management — The Responsible Entity shall establish | LOWER |
| | | and document a process of change control and configuration management for adding, | |
| | | modifying, replacing, or removing Critical Cyber Asset hardware or software, and | |
| | | implement supporting configuration management activities to identify, control and | |
| | | document all entity or vendor related changes to hardware and software components of | |
| | | Critical Cyber Assets pursuant to the change control process. | |
| CIP-004-3 | R1. | Awareness — The Responsible Entity shall establish, document, implement, and | LOWER |
| | | maintain a security awareness program to ensure personnel having authorized cyber or | |
| | | authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security practices. The program shall include security awareness | |
| | | reinforcement on at least a quarterly basis using mechanisms such as: | |
| | | Direct communications (e.g. emails, memos, computer based training, etc.); | |
| | | Indirect communications (e.g. chails, memos, computer based training, etc.); Indirect communications (e.g. posters, intranet, brochures, etc.); | |
| | | Management support and reinforcement (e.g., presentations, meetings, etc.). | |
| | | Training — The Responsible Entity shall establish, document, implement, and maintain | LOWER |
| CIP-004-3 | R2. | an annual cyber security training program for personnel having authorized cyber or | |
| | | authorized unescorted physical access to Critical Cyber Assets. The cyber security | |
| | | training program shall be reviewed annually, at a minimum, and shall be updated | |
| | | whenever necessary. | |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| CIP-004-3 | R2.1. | This program will ensure that all personnel having such access to Critical Cyber Assets, including contractors and service vendors, are trained prior to their being granted such access except in specified circumstances such as an emergency. | MEDIUM |
| CIP-004-3 | R2.2. | Training shall cover the policies, access controls, and procedures as developed for the Critical Cyber Assets covered by CIP-004-3, and include, at a minimum, the following required items appropriate to personnel roles and responsibilities: | MEDIUM |
| CIP-004-3 | R2.2.1. | The proper use of Critical Cyber Assets; | LOWER |
| CIP-004-3 | R2.2.2. | Physical and electronic access controls to Critical Cyber Assets; | LOWER |
| CIP-004-3 | R2.2.3. | The proper handling of Critical Cyber Asset information; and, | LOWER |
| CIP-004-3 | R2.2.4. | Action plans and procedures to recover or re-establish Critical Cyber Assets and access thereto following a Cyber Security Incident. | MEDIUM |
| CIP-004-3 | R2.3. | The Responsible Entity shall maintain documentation that training is conducted at least annually, including the date the training was completed and attendance records. | LOWER |
| CIP-004-3 | R3. | Personnel Risk Assessment —The Responsible Entity shall have a documented personnel risk assessment program, in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements, for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. A personnel risk assessment shall be conducted pursuant to that program prior to such personnel being granted such access except in specified circumstances such as an emergency. | MEDIUM |
| CIP-004-3 | R3.1. | The personnel risk assessment program shall at a minimum include: The Responsible Entity shall ensure that each assessment conducted include, at least, identity verification (e.g., Social Security Number verification in the U.S.) and seven year criminal check. The Responsible Entity may conduct more detailed reviews, as permitted by law and subject to existing collective bargaining unit agreements, depending upon the criticality of the position. | LOWER |
| CIP-004-3 | R3.2. | The Responsible Entity shall update each personnel risk assessment at least every seven years after the initial personnel risk assessment or for cause. | LOWER |
| CIP-004-3 | R3.3. | The Responsible Entity shall document the results of personnel risk assessments of its personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets, and that personnel risk assessments of contractor and service vendor personnel with such access are conducted pursuant to Standard CIP-004-3. | LOWER |
| CIP-004-3 | R4. | Access — The Responsible Entity shall maintain list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets. | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| CIP-004-3 | R4.1. | The Responsible Entity shall review the list(s) of its personnel who have such access to Critical Cyber Assets quarterly, and update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, or any change in the access rights of such personnel. The Responsible Entity shall ensure access list(s) for contractors and service vendors are properly maintained. | LOWER |
| CIP-004-3 | R4.2. | The Responsible Entity shall revoke such access to Critical Cyber Assets within 24 hours for personnel terminated for cause and within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. | LOWER |
| CIP-005-3 | R1. | Electronic Security Perimeter — The Responsible Entity shall ensure that every Critical Cyber Asset resides within an Electronic Security Perimeter. The Responsible Entity shall identify and document the Electronic Security Perimeter(s) and all access points to the perimeter(s). | MEDIUM |
| CIP-005-3 | R1.1. | Access points to the Electronic Security Perimeter(s) shall include any externally connected communication end point (for example, dial-up modems) terminating at any device within the Electronic Security Perimeter(s). | MEDIUM |
| CIP-005-3 | R1.2. | For a dial-up accessible Critical Cyber Asset that uses a non-routable protocol, the Responsible Entity shall define an Electronic Security Perimeter for that single access point at the dial-up device. | MEDIUM |
| CIP-005-3 | R1.3. | Communication links connecting discrete Electronic Security Perimeters shall not be considered part of the Electronic Security Perimeter. However, end points of these communication links within the Electronic Security Perimeter(s) shall be considered access points to the Electronic Security Perimeter(s). | MEDIUM |
| CIP-005-3 | R1.4. | Any non-critical Cyber Asset within a defined Electronic Security Perimeter shall be identified and protected pursuant to the requirements of Standard CIP-005-3. | MEDIUM |
| CIP-005-3 | R1.5. | Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall be afforded the protective measures as a specified in Standard CIP- 003-3; Standard CIP-004-3 Requirement R3; Standard CIP-005-3 Requirements R2 and R3; Standard CIP-006-3 Requirement R3; Standard CIP-007-3 Requirements R1 and R3 through R9; Standard CIP-008-3; and Standard CIP-009-3. | MEDIUM |
| CIP-005-3 | R1.6. | The Responsible Entity shall maintain documentation of Electronic Security Perimeter(s), all interconnected Critical and non-critical Cyber Assets within the Electronic Security Perimeter(s), all electronic access points to the Electronic Security Perimeter(s) and the Cyber Assets deployed for the access control and monitoring of these access points. | LOWER |
| CIP-005-3 | R2. | Electronic Access Controls — The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s). | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-005-3 | R2.1. | These processes and mechanisms shall use an access control model that denies access | MEDIUM |
| | | by default, such that explicit access permissions must be specified. | |
| CIP-005-3 | R2.2. | At all access points to the Electronic Security Perimeter(s), the Responsible Entity shall enable only ports and services required for operations and for monitoring Cyber Assets within the Electronic Security Perimeter, and shall document, individually or by specified grouping, the configuration of those ports and services. | MEDIUM |
| CIP-005-3 | R2.3. | The Responsible Entity shall implement and maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s). | MEDIUM |
| CIP-005-3 | R2.4. | Where external interactive access into the Electronic Security Perimeter has been enabled, the Responsible Entity shall implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible. | MEDIUM |
| CIP-005-3 | R2.5. | The required documentation shall, at least, identify and describe: | LOWER |
| CIP-005-3 | R2.5.1. | The processes for access request and authorization. | LOWER |
| CIP-005-3 | R2.5.2. | The authentication methods. | LOWER |
| CIP-005-3 | R2.5.3. | The review process for authorization rights, in accordance with Standard CIP-004-3 Requirement R4. | LOWER |
| CIP-005-3 | R2.5.4. | The controls used to secure dial-up accessible connections. | LOWER |
| CIP-005-3 | R2.6. | Appropriate Use Banner — Where technically feasible, electronic access control devices shall display an appropriate use banner on the user screen upon all interactive access attempts. The Responsible Entity shall maintain a document identifying the content of the banner. | LOWER |
| CIP-005-3 | R3. | Monitoring Electronic Access — The Responsible Entity shall implement and document an electronic or manual process(es) for monitoring and logging access at access points to the Electronic Security Perimeter(s) twenty-four hours a day, seven days a week. | MEDIUM |
| CIP-005-3 | R3.1. | For dial-up accessible Critical Cyber Assets that use non-routable protocols, the Responsible Entity shall implement and document monitoring process(es) at each access point to the dial-up device, where technically feasible. | MEDIUM |
| CIP-005-3 | R3.2. | Where technically feasible, the security monitoring process(es) shall detect and alert for attempts at or actual unauthorized accesses. These alerts shall provide for appropriate notification to designated response personnel. Where alerting is not technically feasible, the Responsible Entity shall review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. | MEDIUM |
| CIP-005-3 | R4. | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of the electronic access points to the Electronic Security | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| | | Perimeter(s) at least annually. The vulnerability assessment shall include, at a minimum, the following: | |
| CIP-005-3 | R4.1. | A document identifying the vulnerability assessment process; | LOWER |
| CIP-005-3 | R4.2. | A review to verify that only ports and services required for operations at these access points are enabled; | MEDIUM |
| CIP-005-3 | R4.3. | The discovery of all access points to the Electronic Security Perimeter; | MEDIUM |
| CIP-005-3 | R4.4. | A review of controls for default accounts, passwords, and network management community strings; | MEDIUM |
| CIP-005-3 | R4.5. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | MEDIUM |
| CIP-005-3 | R5. | Documentation Review and Maintenance — The Responsible Entity shall review, update, and maintain all documentation to support compliance with the requirements of Standard CIP-005-3. | LOWER |
| CIP-005-3 | R5.1. | The Responsible Entity shall ensure that all documentation required by Standard CIP- 005-2 reflect current configurations and processes and shall review the documents and procedures referenced in Standard CIP-005-3 at least annually. | LOWER |
| CIP-005-3 | R5.2. | The Responsible Entity shall update the documentation to reflect the modification of the network or controls within ninety calendar days of the change. | LOWER |
| CIP-005-3 | R5.3. | The Responsible Entity shall retain electronic access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-3. | LOWER |
| CIP-006-3 | R1. | Physical Security Plan — The Responsible Entity shall document, implement, and maintain a physical security plan, approved by the senior manager or delegate(s) that shall address, at a minimum, the following: | MEDIUM |
| CIP-006-3 | R1.1. | All Cyber Assets within an Electronic Security Perimeter shall reside within an identified Physical Security Perimeter. Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity shall deploy and document alternative measures to control physical access to such Cyber Assets. | MEDIUM |
| CIP-006-3 | R1.2. | Identification of all physical access points through each Physical Security Perimeter and measures to control entry at those access points. | MEDIUM |
| CIP-006-3 | R1.3 | Processes, tools, and procedures to monitor physical access to the perimeter(s). | MEDIUM |
| CIP-006-3 | R1.4 | Appropriate use of physical access controls as described in Requirement R4 including | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| | | visitor pass management, response to loss, and prohibition of inappropriate use of physical access controls. | |
| CIP-006-3 | R1.5 | Review of access authorization requests and revocation of access authorization, in accordance with CIP-004-3 Requirement R4. | MEDIUM |
| CIP-006-3 | R1.6 | A visitor control program for visitors (personnel without authorized unescorted access to a Physical Security Perimeter), containing at a minimum the following: | MEDIUM |
| CIP-006-3a | R1.6.1 | Logs (manual or automated) to document the entry and exit of visitors, including the date and time, to and from Physical Security Perimeters. | MEDIUM |
| CIP-006-3a | R1.6.2 | Continuous escorted access of visitors within the Physical Security Perimeter | MEDIUM |
| CIP-006-3 | R1.7 | Update of the physical security plan within thirty calendar days of the completion of any physical security system redesign or reconfiguration, including, but not limited to, addition or removal of access points through the Physical Security Perimeter, physical access controls, monitoring controls, or logging controls. | LOWER |
| CIP-006-3 | R1.8 | Annual review of the physical security plan. | LOWER |
| CIP-006-3 | R2 | Protection of Physical Access Control Systems — Cyber Assets that authorize and/or log access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers, shall: | MEDIUM |
| CIP-006-3 | R2.1. | Be protected from unauthorized physical access. | MEDIUM |
| CIP-006-3 | R2.2. | Be afforded the protective measures specified in Standard CIP-003-3; Standard CIP-004-3 Requirement R3; Standard CIP-005-3 Requirements R2 and R3; Standard CIP-006-3a Requirements R4 and R5; Standard CIP-007-3; Standard CIP-008-3; and Standard CIP- 009-3. | MEDIUM |
| CIP-006-3 | R3 | Protection of Electronic Access Control Systems — Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall reside within an identified Physical Security Perimeter. | MEDIUM |
| CIP-006-3 | R4 | Physical Access Controls — The Responsible Entity shall document and implement the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. The Responsible Entity shall implement one or more of the following physical access methods: Card Key: A means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| | | one perimeter to another. | |
| | | Special Locks: These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. | |
| | | Security Personnel: Personnel responsible for controlling physical access who may reside on-site or at a monitoring station. | |
| | | Other Authentication Devices: Biometric, keypad, token, or other equivalent devices that control physical access to the Critical Cyber Assets | |
| CIP-006-3 | R5 | Monitoring Physical Access — The Responsible Entity shall document and implement the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. Unauthorized access attempts shall be reviewed immediately and handled in accordance with the procedures specified in Requirement CIP-008-3. One or more of the following monitoring methods shall be used: | MEDIUM |
| | | • Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel responsible for response. | |
| | | Human Observation of Access Points: Monitoring of physical access points by authorized personnel as specified in Requirement R4. | |
| CIP-006-3 | R6 | Logging Physical Access — Logging shall record sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. The Responsible Entity shall implement and document the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: | LOWER |
| | | • Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method. | |
| | | Video Recording: Electronic capture of video images of sufficient quality to determine identity. | |
| | | • Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4 | |
| CIP-006-3 | R7 | Access Log Retention — The responsible entity shall retain physical access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in | LOWER |

| Standard | Requirement | Text of Requirement | VRF |
|-----------|-------------|--|--------|
| Number | Number | accordance with the requirements of Standard CIP-008-3. | |
| CIP-006-3 | R8 | Maintenance and Testing — The Responsible Entity shall implement a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly. The program must include, at a minimum, the following: | MEDIUM |
| CIP-006-3 | R8.1 | Testing and maintenance of all physical security mechanisms on a cycle no longer than three years. | MEDIUM |
| CIP-006-3 | R8.2 | Retention of testing and maintenance records for the cycle determined by the Responsible Entity in Requirement R8.1. | LOWER |
| CIP-006-3 | R8.3 | Retention of outage records regarding access controls, logging, and monitoring for a minimum of one calendar year. | LOWER |
| CIP-007-3 | R1. | Test Procedures — The Responsible Entity shall ensure that new Cyber Assets and significant changes to existing Cyber Assets within the Electronic Security Perimeter do not adversely affect existing cyber security controls. For purposes of Standard CIP-007-3, a significant change shall, at a minimum, include implementation of security patches, cumulative service packs, vendor releases, and version upgrades of operating systems, applications, database platforms, or other third-party software or firmware. | MEDIUM |
| CIP-007-3 | R1.1. | The Responsible Entity shall create, implement, and maintain cyber security test procedures in a manner that minimizes adverse effects on the production system or its operation. | LOWER |
| CIP-007-3 | R1.2. | The Responsible Entity shall document that testing is performed in a manner that reflects the production environment. | LOWER |
| CIP-007-3 | R1.3. | The Responsible Entity shall document test results. | LOWER |
| CIP-007-3 | R2. | Ports and Services — The Responsible Entity shall establish, document and implement a process to ensure that only those ports and services required for normal and emergency operations are enabled. | MEDIUM |
| CIP-007-3 | R2.1. | The Responsible Entity shall enable only those ports and services required for normal and emergency operations. | MEDIUM |
| CIP-007-3 | R2.2. | The Responsible Entity shall disable other ports and services, including those used for testing purposes, prior to production use of all Cyber Assets inside the Electronic Security Perimeter(s). | MEDIUM |
| CIP-007-3 | R2.3. | In the case where unused ports and services cannot be disabled due to technical limitations, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | MEDIUM |
| CIP-007-3 | R3. | Security Patch Management — The Responsible Entity, either separately or as a component of the documented configuration management process specified in CIP-003- | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| | | 3 Requirement R6, shall establish, document and implement a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | |
| CIP-007-3 | R3.1. | The Responsible Entity shall document the assessment of security patches and security upgrades for applicability within thirty calendar days of availability of the patches or upgrades. | LOWER |
| CIP-007-3 | R3.2. | The Responsible Entity shall document the implementation of security patches. In any case where the patch is not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | LOWER |
| CIP-007-3 | R4. | Malicious Software Prevention — The Responsible Entity shall use anti-virus software and other malicious software ("malware") prevention tools, where technically feasible, to detect, prevent, deter, and mitigate the introduction, exposure, and propagation of malware on all Cyber Assets within the Electronic Security Perimeter(s). | MEDIUM |
| CIP-007-3 | R4.1. | The Responsible Entity shall document and implement anti-virus and malware prevention tools. In the case where anti-virus software and malware prevention tools are not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | MEDIUM |
| CIP-007-3 | R4.2. | The Responsible Entity shall document and implement a process for the update of anti- virus and malware prevention "signatures." The process must address testing and installing the signatures. | MEDIUM |
| CIP-007-3 | R5. | Account Management — The Responsible Entity shall establish, implement, and document technical and procedural controls that enforce access authentication of, and accountability for, all user activity, and that minimize the risk of unauthorized system access. | LOWER |
| CIP-007-3 | R5.1. | The Responsible Entity shall ensure that individual and shared system accounts and authorized access permissions are consistent with the concept of "need to know" with respect to work functions performed. | MEDIUM |
| CIP-007-3 | R5.1.1. | The Responsible Entity shall ensure that user accounts are implemented as approved by designated personnel. Refer to Standard CIP-003-3 Requirement R5. | LOWER |
| CIP-007-3 | R5.1.2. | The Responsible Entity shall establish methods, processes, and procedures that generate logs of sufficient detail to create historical audit trails of individual user account access activity for a minimum of ninety days. | LOWER |
| CIP-007-3 | R5.1.3. | The Responsible Entity shall review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003-3 Requirement R5 and Standard CIP-004-3 Requirement R4. | MEDIUM |
| CIP-007-3 | R5.2. | The Responsible Entity shall implement a policy to minimize and manage the scope and acceptable use of administrator, shared, and other generic account privileges including | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| | | factory default accounts. | |
| CIP-007-3 | R5.2.1. | The policy shall include the removal, disabling, or renaming of such accounts where possible. For such accounts that must remain enabled, passwords shall be changed prior to putting any system into service. | MEDIUM |
| CIP-007-3 | R5.2.2. | The Responsible Entity shall identify those individuals with access to shared accounts. | LOWER |
| CIP-007-3 | R5.2.3. | Where such accounts must be shared, the Responsible Entity shall have a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps for securing the account in the event of personnel changes (for example, change in assignment or termination). | MEDIUM |
| CIP-007-3 | R5.3. | At a minimum, the Responsible Entity shall require and use passwords, subject to the following, as technically feasible: | LOWER |
| CIP-007-3 | R5.3.1. | Each password shall be a minimum of six characters. | LOWER |
| CIP-007-3 | R5.3.2. | Each password shall consist of a combination of alpha, numeric, and "special" characters. | LOWER |
| CIP-007-3 | R5.3.3. | Each password shall be changed at least annually, or more frequently based on risk. | MEDIUM |
| CIP-007-3 | R6. | Security Status Monitoring — The Responsible Entity shall ensure that all Cyber Assets within the Electronic Security Perimeter, as technically feasible, implement automated tools or organizational process controls to monitor system events that are related to cyber security. | LOWER |
| CIP-007-3 | R6.1. | The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter. | MEDIUM |
| CIP-007-3 | R6.2. | The security monitoring controls shall issue automated or manual alerts for detected Cyber Security Incidents. | MEDIUM |
| CIP-007-3 | R6.3. | The Responsible Entity shall maintain logs of system events related to cyber security, where technically feasible, to support incident response as required in Standard CIP-008-3. | MEDIUM |
| CIP-007-3 | R6.4. | The Responsible Entity shall retain all logs specified in Requirement R6 for ninety calendar days. | LOWER |
| CIP-007-3 | R6.5. | The Responsible Entity shall review logs of system events related to cyber security and maintain records documenting review of logs. | LOWER |
| CIP-007-3 | R7. | Disposal or Redeployment — The Responsible Entity shall establish and implement formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-3. | LOWER |
| CIP-007-3 | R7.1. | Prior to the disposal of such assets, the Responsible Entity shall destroy or erase the data | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| | | storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | |
| CIP-007-3 | R7.2. | Prior to redeployment of such assets, the Responsible Entity shall, at a minimum, erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | LOWER |
| CIP-007-3 | R7.3. | The Responsible Entity shall maintain records that such assets were disposed of or redeployed in accordance with documented procedures. | LOWER |
| CIP-007-3 | R8 | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of all Cyber Assets within the Electronic Security Perimeter at least annually. The vulnerability assessment shall include, at a minimum, the following: | LOWER |
| CIP-007-3 | R8.1. | A document identifying the vulnerability assessment process; | LOWER |
| CIP-007-3 | R8.2. | A review to verify that only ports and services required for operation of the Cyber Assets within the Electronic Security Perimeter are enabled; | MEDIUM |
| CIP-007-3 | R8.3. | A review of controls for default accounts; and, | MEDIUM |
| CIP-007-3 | R8.4. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | MEDIUM |
| CIP-007-3 | R9 | Documentation Review and Maintenance — The Responsible Entity shall review and update the documentation specified in Standard CIP-007-3 at least annually. Changes resulting from modifications to the systems or controls shall be documented within thirty calendar days of the change being completed. | LOWER |
| CIP-008-3 | R1. | Cyber Security Incident Response Plan — The Responsible Entity shall develop and maintain a Cyber Security Incident response plan and implement the plan in response to Cyber Security Incidents. The Cyber Security Incident response plan shall address, at a minimum, the following: | LOWER |
| CIP-008-3 | R1.1. | Procedures to characterize and classify events as reportable Cyber Security Incidents. | LOWER |
| CIP-008-3 | R1.2. | Response actions, including roles and responsibilities of Cyber Security Incident response teams, Cyber Security Incident handling procedures, and communication plans. | LOWER |
| CIP-008-3 | R1.3. | Process for reporting Cyber Security Incidents to the Electricity Sector Information Sharing and Analysis Center (ES-ISAC). The Responsible Entity must ensure that all reportable Cyber Security Incidents are reported to the ES-ISAC either directly or through an intermediary. | LOWER |
| CIP-008-3 | R1.4. | Process for updating the Cyber Security Incident response plan within thirty calendar days of any changes. | LOWER |
| CIP-008-3 | R1.5. | Process for ensuring that the Cyber Security Incident response plan is reviewed at least | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| | | annually. | |
| CIP-008-3 | R1.6. | Process for ensuring the Cyber Security Incident response plan is tested at least annually. A test of the Cyber Security Incident response plan can range from a paper drill, to a full operational exercise, to the response to an actual incident. | LOWER |
| CIP-008-3 | R2 | Cyber Security Incident Documentation — The Responsible Entity shall keep relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 for three calendar years. | LOWER |
| CIP-009-3 | R1 | Recovery Plans — The Responsible Entity shall create and annually review recovery plan(s) for Critical Cyber Assets. The recovery plan(s) shall address at a minimum the following: | MEDIUM |
| CIP-009-3 | R1.1. | Specify the required actions in response to events or conditions of varying duration and severity that would activate the recovery plan(s). | MEDIUM |
| CIP-009-3 | R1.2. | Define the roles and responsibilities of responders. | MEDIUM |
| CIP-009-3 | R2 | Exercises — The recovery plan(s) shall be exercised at least annually. An exercise of the recovery plan(s) can range from a paper drill, to a full operational exercise, to recovery from an actual incident. | LOWER |
| CIP-009-3 | R3 | Change Control — Recovery plan(s) shall be updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. Updates shall be communicated to personnel responsible for the activation and implementation of the recovery plan(s) within thirty calendar days of the change being completed. | LOWER |
| CIP-009-3 | R4 | Backup and Restore — The recovery plan(s) shall include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. For example, backups may include spare electronic components or equipment, written documentation of configuration settings, tape backup, etc. | LOWER |
| CIP-009-3 | R5 | Testing Backup Media — Information essential to recovery that is stored on backup media shall be tested at least annually to ensure that the information is available. Testing can be completed off site. | LOWER |

EXHIBIT D

CIP VIOLATION RISK FACTORS AND VIOLATION SEVERITY LEVELS – VERSION 4 (CLEAN AND REDLINE)

CIP Version 4 Violation Severity Levels and Violation Risk Factors

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|---|---|
| CIP-002-4 | R1. | Critical Asset Identification — The Responsible Entity shall develop a list of its identified Critical Assets determined through an annual application of the criteria contained in <i>CIP-002-4 Attachment 1 – Critical</i> <i>Asset Criteria</i> . The Responsible Entity shall update this list as necessary, and review it at least annually. | N/A | N/A | The Responsible Entity has developed a list of Critical Assets but the list has not been reviewed and updated annually as required. | The Responsible Entity did not develop a list of its identified Critical Assets even if such list is null. |
| CIP-002-4 | R2. | Critical Cyber Asset Identification— Using the list of Critical Assets developed pursuant to Requirement R1, the Responsible Entity shall develop a list of associated Critical Cyber Assets essential to the operation of the Critical Asset. The Responsible Entity shall update this list as necessary, and review it at least annually. For each group of generating units (including nuclear generation) at a single plant location identified in Attachment 1, criterion 1.1, the only Cyber Assets that must be considered are those shared Cyber Assets that could, within 15 minutes, adversely impact the reliable operation of any combination of units that in aggregate equal or exceed Attachment 1, criterion 1.1. | N/A | N/A | The Responsible Entity has developed a list of associated Critical Cyber Assets essential to the operation of the Critical Asset list as per requirement R2 but the list has not been reviewed and updated annually as required. | The Responsible Entity did not develop a list of associated Critical Cyber Assets essential to the operation of the Critical Asset list as per requirement R2 even if such list is null. OR A Cyber Asset essential to the operation of the Critical Asset was identified that met at least one of the bulleted characteristics in this requirement but was not included in the Critical Cyber Asset List. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|--|---|
| CIP-002-4 | R3. | one of the following characteristics: • The Cyber Asset uses a routable protocol to communicate outside the Electronic Security Perimeter; or, • The Cyber Asset uses a routable protocol within a control center; or, • The Cyber Asset is dial-up accessible. Annual Approval —The senior manager or delegate(s) shall approve annually the list of Critical Assets and the list of Critical Cyber Assets. Based on Requirements R1 and R2 the Responsible Entity may determine that it has no Critical Assets or Critical Cyber Assets. The Responsible Entity shall keep a signed and dated record of the senior manager or delegate(s)'s approval of the list of Critical Assets and the list of Critical Cyber Assets (even if such lists are null.) | N/A | N/A | The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s)'s annual approval of the list of Critical Assets. OR The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s)'s annual approval of the list of Critical Cyber Assets (even if such lists are null.) | The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s)'s annual approval of both the list of Critical Assets and the list of Critical Cyber Assets (even if such lists are null.) |
| CIP-003-4 | R1. | Cyber Security Policy — The Responsible Entity shall document and implement a cyber security policy that represents management's commitment and ability to secure its Critical Cyber | N/A | N/A | N/A | The Responsible Entity has not documented or implemented a cyber security |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|----------|---|
| | | Assets. The Responsible Entity shall, at minimum, ensure the following: | | | | policy. |
| CIP-003-4 | R1.1. | The cyber security policy addresses the requirements in Standards CIP- 002-4 through CIP-009-4, including provision for emergency situations. | N/A | N/A | N/A | The Responsible Entity's cyber security policy does not address all the requirements in Standards CIP-002 through CIP-009, including provision for emergency situations. |
| CIP-003-4 | R1.2. | The cyber security policy is readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets. | N/A | N/A | N/A | The Responsible Entity's cyber security policy is not readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets. |
| CIP-003-4 | R1.3 | Annual review and approval of the cyber security policy by the senior manager assigned pursuant to R2. | N/A | N/A | N/A | The Responsible Entity's senior manager, assigned pursuant to R2, did not complete the annual review and approval of its cyber security policy. |
| CIP-003-4 | R2. | Leadership — The Responsible Entity shall assign a senior manager with overall responsibility for leading and managing the entity's implementation of, and adherence to, Standards CIP-002-4 through CIP- 009-4. | N/A | N/A | N/A | The Responsible Entity has not assigned a single senior manager with overall responsibility and authority for leading and |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|---|---|
| | | | | | | managing the entity's implementation of, and adherence to, Standards CIP-002 through CIP-009. |
| CIP-003-4 | R2.1. | The senior manager shall be identified by name, title, and date of designation. | N/A | N/A | N/A | Identification of the senior manager is missing one of the following: name, title, or date of designation. |
| CIP-003-4 | R2.2. | Changes to the senior manager must be documented within thirty calendar days of the effective date. | N/A | N/A | N/A | Changes to the senior manager were not documented within 30 days of the effective date. |
| CIP-003-4 | R2.3. | Where allowed by Standards CIP- 002-4 through CIP-009-4, the senior manager may delegate authority for specific actions to a named delegate or delegates. These delegations shall be documented in the same manner as R2.1 and R2.2, and approved by the senior manager. | N/A | N/A | The identification of a senior manager's delegate does not include at least one of the following; name, title, or date of the designation, OR The document is not approved by the senior manager, OR | A senior manager's delegate is not identified by name, title, and date of designation; the document delegating the authority does not identify the authority being delegated; the document delegating the authority is not approved by the senior manager; |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | Changes to the delegated authority are not documented within thirty calendar days of the effective date. | AND changes to the delegated authority are not documented within thirty calendar days of the effective date. |
| CIP-003-4 | R2.4 | The senior manager or delegate(s), shall authorize and document any exception from the requirements of the cyber security policy. | N/A | N/A | N/A | The senior manager or delegate(s) did not authorize and document any exceptions from the requirements of the cyber security policy as required. |
| CIP-003-4 | R3. | Exceptions — Instances where the Responsible Entity cannot conform to its cyber security policy must be documented as exceptions and authorized by the senior manager or delegate(s). | N/A | N/A | In Instances where the Responsible Entity cannot conform to its cyber security policy, in R1, exceptions were documented, but were not authorized by the senior manager or delegate(s). | In Instances where the Responsible Entity cannot conform to its cyber security policy, in R1, exceptions were not documented. |
| CIP-003-4 | R3.1. | Exceptions to the Responsible Entity's cyber security policy must be documented within thirty days of being approved by the senior manager or delegate(s). | N/A | N/A | N/A | Exceptions to the Responsible Entity's cyber security policy were not documented within 30 days of being approved by the senior manager or |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | delegate(s). |
| CIP-003-4 | R3.2. | Documented exceptions to the cyber security policy must include an explanation as to why the exception is necessary and any compensating measures. | N/A | N/A | The Responsible Entity has a documented exception to the cyber security policy in R1 but did not include either : | The Responsible Entity has a documented exception to the cyber security policy in R1 but did not include both: |
| | | | | | 1) an explanation as to why the exception is necessary, or | an explanation as to why the exception is necessary, and |
| | | | | | 2) any compensating measures. | 2) any compensating measures. |
| CIP-003-4 | R3.3. | Authorized exceptions to the cyber security policy must be reviewed and approved annually by the senior manager or delegate(s) to ensure the exceptions are still required and valid. Such review and approval shall be documented. | N/A | N/A | N/A | Exceptions to the cyber security policy were not reviewed or were not approved on an annual basis by the senior manager or delegate(s) to ensure the exceptions are still required and valid or the review and approval is not documented. |
| CIP-003-4 | R4. | Information Protection — The Responsible Entity shall implement and document a program to identify, classify, and protect information associated with Critical Cyber Assets. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document a program to identify, classify, and protect |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|---|---|
| | | | | | | information associated with Critical Cyber Assets. |
| CIP-003-4 | R4.1. | The Critical Cyber Asset information to be protected shall include, at a minimum and regardless of media type, operational procedures, lists as required in Standard CIP-002-4, network topology or similar diagrams, floor plans of computing centers that contain Critical Cyber Assets, equipment layouts of Critical Cyber Assets, disaster recovery plans, incident response plans, and security configuration information. | N/A | N/A | The information protection program does not include one of the minimum information types to be protected as detailed in R4.1. | The information protection program does not include two or more of the minimum information types to be protected as detailed in R4.1. |
| CIP-003-4 | R4.2. | The Responsible Entity shall classify information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. | N/A | N/A | N/A | The Responsible Entity did not classify the information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. |
| CIP-003-4 | R4.3. | The Responsible Entity shall, at least annually, assess adherence to its Critical Cyber Asset information protection program, document the assessment results, and implement an action plan to remediate deficiencies identified during the assessment. | N/A | N/A | N/A | The Responsible Entity did not annually assess adherence to its Critical Cyber Asset information protection program, including documentation of the assessment results, OR |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | The Responsible Entity did not implement an action plan to remediate deficiencies identified during the assessment. |
| CIP-003-4 | R5. | Access Control — The Responsible Entity shall document and implement a program for managing access to protected Critical Cyber Asset information. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document a program for managing access to protected Critical Cyber Asset information. |
| CIP-003-4 | R5.1. | The Responsible Entity shall maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information. | N/A | N/A | The Responsible Entity maintained a list of designated personnel for authorizing either logical or physical access but not both. | The Responsible Entity did not maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information. |
| CIP-003-4 | R5.1.1. | Personnel shall be identified by name, title, and the information for which they are responsible for authorizing access. | N/A | N/A | The Responsible Entity did identify the personnel by name, title, and the information for which they are responsible for authorizing access, but the business | Personnel are not identified by name, title, or the information for which they are responsible for authorizing access. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | phone is missing. | |
| CIP-003-4 | R5.1.2. | The list of personnel responsible for authorizing access to protected information shall be verified at least annually. | N/A | N/A | N/A | The Responsible Entity did not verify at least annually the list of personnel responsible for authorizing access to protected information. |
| CIP-003-4 | R5.2. | The Responsible Entity shall review at least annually the access privileges to protected information to confirm that access privileges are correct and that they correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities. | N/A | N/A | N/A | The Responsible Entity did not review at least annually the access privileges to protected information to confirm that access privileges are correct and that they correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities. |
| CIP-003-4 | R5.3. | The Responsible Entity shall assess and document at least annually the processes for controlling access privileges to protected information. | N/A | N/A | N/A | The Responsible Entity did not assess and document at least annually the processes for controlling access privileges to protected information. |
| CIP-003-4 | R6. | Change Control and Configuration Management — The Responsible | N/A | N/A | N/A | The Responsible Entity has not |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|--|---|
| | | Entity shall establish and document a process of change control and configuration management for adding, modifying, replacing, or removing Critical Cyber Asset hardware or software, and implement supporting configuration management activities to identify, control and document all entity or vendor related changes to hardware and software components of Critical Cyber Assets pursuant to the change control process. | | | | established or documented a change control process for the activities required in R6, OR The Responsible Entity has not established or documented a configuration management process for the activities required in R6. |
| CIP-004-4 | R1. | Awareness — The Responsible Entity shall establish, document, implement, and maintain a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security practices. The program shall include security awareness reinforcement on at least a quarterly basis using mechanisms such as: Direct communications (e.g. emails, memos, computer based training, etc.); Indirect communications | N/A | N/A | The Responsible ^{[1}] Entity did not provide security awareness reinforcement on at least a quarterly basis. | The Responsible Entity did not establish, implement, maintain, or document a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security |

¹ Please note that FERC's January 20, 2011 Order on Version 2 And Version 3 Violation Risk Factors And Violation Severity Levels For Critical Infrastructure Protection Reliability Standards dictated "Responsible Entity" to be changed to "Responsibility Entity." NERC assumes FERC intended the VSL to read "Responsible Entity" and therefore is not making this change. NERC proposes to remove this footnote from the final approved list of VSLs.

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|---|---|
| | | (e.g. posters, intranet, brochures, etc.); Management support and reinforcement (e.g., presentations, meetings, etc.). | | | | practices. |
| CIP-004-4 | R2. | Training — The Responsible Entity shall establish, document, implement, and maintain an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. The cyber security training program shall be reviewed annually, at a minimum, and shall be updated whenever necessary. | N/A | N/A | The Responsible[²] Entity did not review the training program on an annual basis. | The Responsible Entity did not establish, implement, maintain, or document an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. |
| CIP-004-4 | R2.1. | This program will ensure that all personnel having such access to Critical Cyber Assets, including contractors and service vendors, are trained prior to their being granted such access except in specified circumstances such as an emergency. | N/A | N/A | N/A | Not all personnel having authorized cyber or unescorted physical access to Critical Cyber Assets, including contractors and service vendors, were trained prior to their being granted such access except in specified circumstances such as an emergency. |

² Please see previous footnote. NERC proposes to remove this footnote from the final approved list of VSLs.

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--|--|--|
| CIP-004-4 | R2.2. | Training shall cover the policies, access controls, and procedures as developed for the Critical Cyber Assets covered by CIP-004-4, and include, at a minimum, the following required items appropriate to personnel roles and responsibilities: | N/A | N/A | N/A | The training does not include one or more of the minimum topics as detailed in R2.2.1, R2.2.2, R2.2.3, R2.2.4. |
| CIP-004-4 | R2.2.1. | The proper use of Critical Cyber Assets; | N/A | N/A | N/A | N/A |
| CIP-004-4 | R2.2.2. | Physical and electronic access controls to Critical Cyber Assets; | N/A | N/A | N/A | N/A |
| CIP-004-4 | R2.2.3. | The proper handling of Critical Cyber Asset information; and, | N/A | N/A | N/A | N/A |
| CIP-004-4 | R2.2.4. | Action plans and procedures to recover or re-establish Critical Cyber Assets and access thereto following a Cyber Security Incident. | N/A | N/A | N/A | N/A |
| CIP-004-4 | R2.3. | The Responsible Entity shall maintain documentation that training is conducted at least annually, including the date the training was completed and attendance records. | N/A | N/A | The Responsible Entity did maintain documentation that training is conducted at least annually, but did not include attendance records. | The Responsible Entity did not maintain documentation that training is conducted at least annually, including the date the training was completed and attendance records. |
| CIP-004-4 | R3. | Personnel Risk Assessment —The Responsible Entity shall have a documented personnel risk assessment program, in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements, for personnel having | N/A | The Responsible Entity has a personnel risk assessment program, as stated in R3, for personnel having authorized | The Responsible Entity has a personnel risk assessment program as stated in R3, but conducted the personnel risk | The Responsible Entity does not have a documented personnel risk assessment program, as stated in R3, for personnel |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--|--|--|
| | | authorized cyber or authorized unescorted physical access to Critical Cyber Assets. A personnel risk assessment shall be conducted pursuant to that program prior to such personnel being granted such access except in specified circumstances such as an emergency. The personnel risk assessment program shall at a minimum include: | | cyber or authorized unescorted physical access, but the program is not documented. | assessment pursuant to that program after such personnel were granted such access except in specified circumstances such as an emergency. | having authorized cyber or authorized unescorted physical access. OR The Responsible Entity did not conduct the personnel risk assessment pursuant to that program for personnel granted such access except in specified circumstances such as an emergency. |
| CIP-004-4 | R3.1. | The Responsible Entity shall ensure that each assessment conducted include, at least, identity verification (e.g., Social Security Number verification in the U.S.) and seven year criminal check. The Responsible Entity may conduct more detailed reviews, as permitted by law and subject to existing collective bargaining unit agreements, depending upon the criticality of the position. | N/A | N/A | The Responsible Entity did not ensure that an assessment conducted included an identity verification (e.g., Social Security Number verification in the U.S.) or a seven-year criminal check. | The Responsible Entity did not ensure that each assessment conducted include, at least, identity verification (e.g., Social Security Number verification in the U.S.) and seven-year criminal check. |
| CIP-004-4 | R3.2. | The Responsible Entity shall update each personnel risk assessment at least every seven years after the initial personnel risk assessment or for cause. | N/A | The Responsible Entity did not update each personnel risk assessment at least | The Responsible Entity did not update each personnel risk assessment for | The Responsible Entity did not update each personnel risk assessment at least |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|---|--|---|--|
| | | | | every seven years after the initial personnel risk assessment but did update it for cause when applicable. | cause (when applicable) but did at least updated it every seven years after the initial personnel risk assessment. | every seven years after the initial personnel risk assessment nor was it updated for cause when applicable. |
| CIP-004-4 | R3.3. | The Responsible Entity shall document the results of personnel risk assessments of its personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets, and that personnel risk assessments of contractor and service vendor personnel with such access are conducted pursuant to Standard CIP- 004-4. | The Responsible Entity did not document the results of personnel risk assessments for at least one individual but less than 5% of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | The Responsible Entity did not document the results of personnel risk assessments for 5% or more but less than 10% of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | The Responsible Entity did not document the results of personnel risk assessments for 10% or more but less than 15% of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | The Responsible Entity did not document the results of personnel risk assessments for 15% or more of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. |
| CIP-004-4 | R4. | Access — The Responsible Entity shall maintain list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets. | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | Cyber Assets, missing at least one individual but less than 5% of the authorized personnel. | Cyber Assets, missing 5% or more but less than 10% of the authorized personnel. | Cyber Assets, missing 10% or more but less than 15%of the authorized personnel. | Cyber Assets, missing 15% or more of the authorized personnel. |
| CIP-004-4 | R4.1. | The Responsible Entity shall review the list(s) of its personnel who have such access to Critical Cyber Assets quarterly, and update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, or any change in the access rights of such personnel. The Responsible Entity shall ensure access list(s) for contractors and service vendors are properly maintained. | N/A | The Responsible Entity did not review the list(s) of its personnel who have access to Critical Cyber Assets quarterly. | The Responsible Entity did not update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, nor any change in the access rights of such personnel. | The Responsible Entity did not review the list(s) of all personnel who have access to Critical Cyber Assets quarterly, nor update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, nor any change in the access rights of such personnel. |
| CIP-004-4 | R4.2. | The Responsible Entity shall revoke such access to Critical Cyber Assets within 24 hours for personnel terminated for cause and within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. | N/A | The Responsible Entity did not revoke access within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. | The Responsible Entity did not revoke access to Critical Cyber Assets within 24 hours for personnel terminated for cause. | The Responsible Entity did not revoke access to Critical Cyber Assets within 24 hours for personnel terminated for cause nor within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-005-4 | R1. | Electronic Security Perimeter — The Responsible Entity shall ensure that every Critical Cyber Asset resides within an Electronic Security Perimeter. The Responsible Entity shall identify and document the Electronic Security Perimeter(s) and all access points to the perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not ensure that every Critical Cyber Asset resides within an Electronic Security Perimeter. OR The Responsible Entity did not identify and document the Electronic Security Perimeter(s) and all access points to the perimeter(s). |
| CIP-005-4 | R1.1. | Access points to the Electronic Security Perimeter(s) shall include any externally connected communication end point (for example, dial-up modems) terminating at any device within the Electronic Security Perimeter(s). | N/A | N/A | N/A | Access points to the Electronic Security Perimeter(s) do not include all externally connected communication end point (for example, dial-up modems) terminating at any device within the Electronic Security Perimeter(s). |
| CIP-005-4 | R1.2. | For a dial-up accessible Critical Cyber Asset that uses a non-routable protocol, the Responsible Entity shall define an Electronic Security Perimeter for that single access point at the dial-up device. | N/A | N/A | N/A | For one or more dial-up accessible Critical Cyber Assets that use a non- routable protocol, the Responsible Entity did not define an Electronic |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | Security Perimeter for that single access point at the dial-up device. |
| CIP-005-4 | R1.3. | Communication links connecting discrete Electronic Security Perimeters shall not be considered part of the Electronic Security Perimeter. However, end points of these communication links within the Electronic Security Perimeter(s) shall be considered access points to the Electronic Security Perimeter(s). | N/A | N/A | N/A | At least one end point of a communication link within the Electronic Security Perimeter(s) connecting discrete Electronic Security Perimeters was not considered an access point to the Electronic Security Perimeter. |
| CIP-005-4 | R1.4. | Any non-critical Cyber Asset within a defined Electronic Security Perimeter shall be identified and protected pursuant to the requirements of Standard CIP-005-4. | N/A | N/A | N/A | One or more noncritical Cyber Asset within a defined Electronic Security Perimeter is not identified. OR Is not protected pursuant to the |
| | | | | | | requirements of Standard CIP-005. |
| CIP-005-4 | R1.5. | Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall be afforded the protective measures as a specified in Standard CIP-003-4; Standard CIP-004-4 Requirement R3; Standard CIP-005-4 Requirements R2 | N/A | N/A | N/A | A Cyber Asset used in the access control and/or monitoring of the Electronic Security Perimeter(s) was not afforded one (1) or |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | and R3; Standard CIP-006-4 Requirement R3; Standard CIP-007-4 Requirements R1 and R3 through R9; Standard CIP-008-4; and Standard CIP-009-4. | | | | more of the protective measures as specified in Standard CIP-003-4; Standard CIP-004-4 Requirement R3; Standard CIP- 005-4 Requirements R2 and R3; Standard CIP-006-4c Requirements R3; Standard CIP-007-4 Requirements R1 and R3 through R9; Standard CIP-008-4; and Standard CIP- 009-4. |
| CIP-005-4 | R1.6. | The Responsible Entity shall maintain documentation of Electronic Security Perimeter(s), all interconnected Critical and non-critical Cyber Assets within the Electronic Security Perimeter(s), all electronic access points to the Electronic Security Perimeter(s) and the Cyber Assets deployed for the access control and monitoring of these access points. | N/A | N/A | N/A | The Responsible Entity did not maintain documentation of one or more of the following: Electronic Security Perimeter(s), interconnected Critical and noncritical Cyber Assets within the Electronic Security Perimeter(s), electronic access points to the Electronic Security Perimeter(s) and Cyber Assets deployed for the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | access control and monitoring of these access points. |
| CIP-005-4 | R2. | Electronic Access Controls — The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not implement or did not document the organizational processes and technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s). |
| CIP-005-4 | R2.1. | These processes and mechanisms shall use an access control model that denies access by default, such that explicit access permissions must be specified. | N/A | N/A | N/A | The processes and mechanisms did not use an access control model that denies access by default, such that explicit access permissions must be specified. |
| CIP-005-4 | R2.2. | At all access points to the Electronic Security Perimeter(s), the Responsible Entity shall enable only ports and services required for operations and for monitoring Cyber Assets within the Electronic Security Perimeter, and shall document, individually or by specified grouping, | N/A | N/A | N/A | At one or more access points to the Electronic Security Perimeter(s), the Responsible Entity enabled ports and services not required for operations and for |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | the configuration of those ports and services. | | | | monitoring Cyber Assets within the Electronic Security Perimeter, or did not document, individually or by specified grouping, the configuration of those ports and services. |
| CIP-005-4 | R2.3. | The Responsible Entity shall implement and maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not implement or maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s) where applicable. |
| CIP-005-4 | R2.4. | Where external interactive access into the Electronic Security Perimeter has been enabled, the Responsible Entity shall implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible. | N/A | N/A | N/A | Where external interactive access into the Electronic Security Perimeter has been enabled the Responsible Entity did not implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible. |
| CIP-005-4 | R2.5. | The required documentation shall, at | N/A | N/A | N/A | The required |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | least, identify and describe: | | | | documentation for R2 did not include one or more of the elements described in R2.5.1 through R2.5.4. |
| CIP-005-4 | R2.5.1. | The processes for access request and authorization. | N/A | N/A | N/A | N/A |
| CIP-005-4 | R2.5.2. | The authentication methods. | N/A | N/A | N/A | N/A |
| CIP-005-4 | R2.5.3. | The review process for authorization rights, in accordance with Standard CIP-004-4 Requirement R4. | N/A | N/A | N/A | N/A |
| CIP-005-4 | R2.5.4. | The controls used to secure dial-up accessible connections. | N/A | N/A | N/A | N/A |
| CIP-005-4 | R2.6. | Appropriate Use Banner — Where technically feasible, electronic access control devices shall display an appropriate use banner on the user screen upon all interactive access attempts. The Responsible Entity shall maintain a document identifying the content of the banner. | The Responsible Entity did not maintain a document identifying the content of the banner. OR Where technically feasible less than 5% electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. | Where technically feasible 5% but less than 10% of electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. | Where technically feasible 10% but less than 15% of electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. | Where technically feasible, 15% or more electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. |
| CIP-005-4 | R3. | Monitoring Electronic Access — The Responsible Entity shall implement | N/A | N/A | N/A | The Responsible Entity did not |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | and document an electronic or manual process(es) for monitoring and logging access at access points to the Electronic Security Perimeter(s) twenty-four hours a day, seven days a week. | | | | implement or did not document electronic or manual processes monitoring and logging access points. |
| CIP-005-4 | R3.1. | For dial-up accessible Critical Cyber Assets that use non-routable protocols, the Responsible Entity shall implement and document monitoring process(es) at each access point to the dial-up device, where technically feasible. | N/A | N/A | N/A | Where technically feasible, the Responsible Entity did not implement or did not document electronic or manual processes for monitoring at one or more access points to dial-up devices. |
| CIP-005-4 | R3.2. | Where technically feasible, the security monitoring process(es) shall detect and alert for attempts at or actual unauthorized accesses. These alerts shall provide for appropriate notification to designated response personnel. Where alerting is not technically feasible, the Responsible Entity shall review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. | N/A | N/A | N/A | Where technically feasible, the Responsible Entity did not implement security monitoring process(es) to detect and alert for attempts at or actual unauthorized accesses. OR The above alerts do not provide for appropriate notification to designated response personnel. OR |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | Where alerting is not technically feasible, the Responsible Entity did not review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. |
| CIP-005-4 | R4. | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of the electronic access points to the Electronic Security Perimeter(s) at least annually. The vulnerability assessment shall include, at a minimum, the following: | N/A | N/A | N/A | The Responsible Entity did not perform a Vulnerability Assessment at least annually for one or more of the access points to the Electronic Security Perimeter(s). OR The vulnerability assessment did not include one (1) or more of the subrequirements R4.1, R4.2, R4.3, R4.4, R4.5. |
| CIP-005-4 | R4.1. | A document identifying the vulnerability assessment process; | N/A | N/A | N/A | N/A |
| CIP-005-4 | R4.2. | A review to verify that only ports and services required for operations at these access | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | points are enabled; | | | | |
| CIP-005-4 | R4.3. | The discovery of all access points to the Electronic Security Perimeter; | N/A | N/A | N/A | N/A |
| CIP-005-4 | R4.4. | A review of controls for default accounts, passwords, and network management community strings; | N/A | N/A | N/A | N/A |
| CIP-005-4 | R4.5. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | N/A | N/A | N/A | N/A |
| CIP-005-4 | R5. | Documentation Review and Maintenance — The Responsible Entity shall review, update, and maintain all documentation to support compliance with the requirements of Standard CIP-005-4. | The Responsible Entity did not review, update, and maintain at least one but less than or equal to 5% of the documentation to support compliance with the requirements of Standard CIP-005. | The Responsible Entity did not review, update, and maintain greater than 5% but less than or equal to 10% of the documentation to support compliance with the requirements of Standard CIP-005. | The Responsible Entity did not review, update, and maintain greater than 10% but less than or equal to 15% of the documentation to support compliance with the requirements of Standard CIP-005. | The Responsible Entity did not review, update, and maintain greater than 15% of the documentation to support compliance with the requirements of Standard CIP-005. |
| CIP-005-4 | R5.1. | The Responsible Entity shall ensure that all documentation required by Standard CIP-005-4 reflect current configurations and processes and shall review the documents and procedures referenced in Standard CIP-005-4 at least annually. | N/A | The Responsible Entity did not provide evidence of an annual review of the documents and procedures referenced in Standard CIP-005. | The Responsible Entity did not document current configurations and processes referenced in Standard CIP-005. | The Responsible Entity did not document current configurations and processes and did not review the documents and procedures referenced in Standard CIP-005 at least annually. |
| CIP-005-4 | R5.2. | The Responsible Entity shall update | N/A | N/A | N/A | The Responsible |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | the documentation to reflect the modification of the network or controls within ninety calendar days of the change. | | | | Entity did not update documentation to reflect a modification of the network or controls within ninety calendar days of the change. |
| CIP-005-4 | R5.3. | The Responsible Entity shall retain electronic access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-4. | The Responsible Entity retained electronic access logs for 75 or more calendar days, but for less than 90 calendar days. | The Responsible Entity retained electronic access logs for 60 or more calendar days, but for less than 75 calendar days. | The Responsible Entity retained electronic access logs for 45 or more calendar days, but for less than 60 calendar days. | The Responsible Entity retained electronic access logs for less than 45 calendar days. |
| CIP-006-4c | R1. | Physical Security Plan — The Responsible Entity shall document, implement, and maintain a physical security plan, approved by the senior manager or delegate(s) that shall address, at a minimum, the following: | N/A | N/A | The Responsible Entity created a physical security plan but did not gain approval by a senior manager or delegate(s). OR The Responsible Entity created and implemented but did not maintain a physical security plan. | The Responsible Entity did not document, implement, and maintain a physical security plan. |
| CIP-006-4c | R1.1. | All Cyber Assets within an Electronic Security Perimeter shall reside within an identified Physical Security | N/A | N/A | N/A | The Responsible Entity's physical security plan does |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | Perimeter. Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity shall deploy and document alternative measures to control physical access to such Cyber Assets. | | | | not include processes to ensure and document that all Cyber Assets within an Electronic Security Perimeter also reside within an identified Physical Security Perimeter. OR Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity has not deployed or documented alternative measures to control physical access to such Cyber Assets within the Electronic Security Perimeter. |
| CIP-006-4c | R1.2. | Identification of all physical access points through each Physical Security Perimeter and measures to control entry at those access points. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not identify all access points through each Physical Security Perimeter or does not identify measures to control entry at those |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | access points. |
| CIP-006-4c | R1.3 | Processes, tools, and procedures to monitor physical access to the perimeter(s). | N/A | N/A | N/A | The Responsible Entity's physical security plan does not include processes, tools, and procedures to monitor physical access to the perimeter(s). |
| CIP-006-4c | R1.4 | Appropriate use of physical access controls as described in Requirement R4 including visitor pass management, response to loss, and prohibition of inappropriate use of physical access controls. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not address the appropriate use of physical access controls as described in Requirement R4. |
| CIP-006-4c | R1.5 | Review of access authorization requests and revocation of access authorization, in accordance with CIP-004-4 Requirement R4. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not address the review of access authorization requests or the revocation of access authorization, in accordance with CIP-004-4 Requirement R4. |
| CIP-006-4c | R1.6 | A visitor control program for visitors (personnel without authorized unescorted access to a Physical Security Perimeter), containing at a minimum the following: | N/A | N/A | N/A | The Responsible Entity did not include or implement a visitor control program in |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | its physical security plan or it does not meet the requirements of continuous escort. |
| CIP-006-4c | R1.6.1 | Logs (manual or automated) to document the entry and exit of visitors, including the date and time, to and from Physical Security Perimeters. | N/A | N/A | N/A | N/A |
| CIP-006-4c | R1.6.2 | Continuous escorted access of visitors within the Physical Security Perimeter | N/A | N/A | N/A | N/A |
| CIP-006-4c | R1.7 | Update of the physical security plan within thirty calendar days of the completion of any physical security system redesign or reconfiguration, including, but not limited to, addition or removal of access points through the Physical Security Perimeter, physical access controls, monitoring controls, or logging controls. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not address r updating the physical security plan within-thirty calendar days of the completion of a physical security system redesign or within thirty calendar days of the completion of a reconfiguration. |
| | | | | | | OR |
| | | | | | | The plan was not updated within thirty calendar days of the completion of |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | a physical security system redesign or reconfiguration |
| CIP-006-4c | R1.8 | Annual review of the physical security plan. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not address a process for ensuring that the physical security plan is reviewed at least annually. |
| CIP-006-4c | R2 | Protection of Physical Access Control Systems — Cyber Assets that authorize and/or log access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers, shall: | N/A | N/A | N/A | A Cyber Asset that authorizes and/or logs access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers, was not protected from unauthorized physical access. OR A Cyber Asset that authorizes and/or logs access to the Physical Security Perimeter(s), |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers was not afforded the protective measures specified in Standard CIP-003-4; Standard CIP-004-4 Requirement R3; Standard CIP- 005-4 Requirements R2 and R3; Standard CIP-006-4c Requirements R4 and R5; Standard CIP-007-4; Standard CIP-008-4; and Standard CIP-009-4. |
| CIP-006-4c | R2.1. | Be protected from unauthorized physical access. | N/A | N/A | N/A | N/A |
| CIP-006-4c | R2.2. | Be afforded the protective measures specified in Standard CIP-003-4; Standard CIP-004-4 Requirement R3; Standard CIP-005-4 Requirements R2 and R3; Standard CIP-006-4a Requirements R4 and R5; Standard CIP-007-4; Standard CIP-008-4; and Standard CIP-009-4. | N/A | N/A | N/A | N/A |
| CIP-006-4c | R3 | Protection of Electronic Access Control Systems — Cyber Assets | N/A | N/A | N/A | A Cyber Assets used in the access control |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall reside within an identified Physical Security Perimeter. | | | | and/or monitoring of the Electronic Security Perimeter(s) does not reside within an identified Physical Security Perimeter. |
| CIP-006-4c | R4 | Physical Access Controls — The Responsible Entity shall document and implement the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. The Responsible Entity shall implement one or more of the following physical access methods: Card Key: A means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from one perimeter to another. Special Locks: These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. Security Personnel: Personnel responsible for controlling physical access who may reside on-site or at a monitoring station. | N/A | N/A | N/A | The Responsible Entity has not documented or has not implemented the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty- four hours a day, seven days a week using one or more of the following physical access methods: • Card Key: A means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from one perimeter to another. • Special Locks: These include, but |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | Other Authentication Devices: Biometric, keypad, token, or other equivalent devices that control physical access to the Critical Cyber Assets | | | | are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. • Security Personnel: Personnel responsible for controlling physical access who may reside on-site or at a monitoring station. • Other Authentication Devices: Biometric, keypad, token, or other equivalent devices that control physical access to the Critical Cyber Assets. |
| CIP-006-4c | R5 | Monitoring Physical Access — The Responsible Entity shall document and implement the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. Unauthorized access attempts shall be reviewed immediately and handled in accordance with the procedures specified in Requirement CIP-008-4. | N/A | N/A. | N/A | The Responsible Entity has not documented or has not implemented the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | One or more of the following | | | | twenty-four hours a |
| | | monitoring methods shall be used: | | | | day, seven |
| | | | | | | days a week using |
| | | Alarm Systems: Systems that | | | | one or more of |
| | | alarm to indicate a door, | | | | the following |
| | | gate or window has been | | | | monitoring |
| | | opened without | | | | methods: |
| | | authorization. These alarms | | | | Alarm Systems: |
| | | must provide for immediate | | | | Systems that |
| | | notification to personnel | | | | alarm to indicate a |
| | | responsible for response. | | | | door, gate or |
| | | | | | | window has been |
| | | Human Observation of | | | | opened without |
| | | Access Points: Monitoring of | | | | authorization. These |
| | | physical access points by | | | | alarms must |
| | | authorized personnel as | | | | provide for |
| | | specified in Requirement R4. | | | | immediate |
| | | | | | | notification to |
| | | | | | | personnel |
| | | | | | | responsible for |
| | | | | | | response. |
| | | | | | | • Human |
| | | | | | | Observation of |
| | | | | | | Access Points: |
| | | | | | | Monitoring of |
| | | | | | | physical access |
| | | | | | | points by authorized |
| | | | | | | personnel as |
| | | | | | | specified in Requirement R4. |
| | | | | | | Requirement R4. |
| | | | | | | OR |
| | | | | | | |
| | | | | | | An unauthorized |
| | | | | | | access attempt |
| | | | | | | was not reviewed |
| | | | | | | immediately and |
| | | | | | 1 | initieulately allu |

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| | | | | | | handled in accordance with CIP-008-4. |
| CIP-006-4c | R6 | Logging Physical Access — Logging shall record sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. The Responsible Entity shall implement and document the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method. Video Recording: Electronic capture of video images of sufficient quality to determine identity. Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor | | N/A | N/A | The Responsible Entity has not implemented or has not documented the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: • Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method, • Video Recording: Electronic capture of video images of sufficient quality to determine identity, or • Manual Logging: A log book or sign-in sheet, or other record of physical access maintained |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | by security or other personnel authorized to control and monitor physical access as specified in Requirement R4. |
| | | | | | | OR |
| | | | | | | The Responsible Entity has not recorded sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. |
| CIP-006-4c | R7 | Access Log Retention — The responsible entity shall retain physical access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-4. | N/A | N/A | N/A | The responsible entity did not retain physical access logs for at least ninety calendar days. |
| CIP-006-4c | R8 | Maintenance and Testing — The Responsible Entity shall implement a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly. The program must include, at a minimum, the following: | N/A | N/A | N/A | The Responsible Entity has not implemented a maintenance and testing program to ensure that all physical security systems under Requirements R4, |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | R5, and R6 function properly. |
| | | | | | | OR |
| | | | | | | The implemented program does not include one or more of the requirements; R8.1, R8.2, and R8.3. |
| CIP-006-4c | R8.1 | Testing and maintenance of all physical security mechanisms on a cycle no longer than three years. | N/A | N/A | N/A | N/A |
| CIP-006-4c | R8.2 | Retention of testing and maintenance records for the cycle determined by the Responsible Entity in Requirement R8.1. | N/A | N/A | N/A | N/A |
| CIP-006-4c | R8.3 | Retention of outage records regarding access controls, logging, and monitoring for a minimum of one calendar year. | N/A | N/A | N/A | N/A |
| CIP-007-4 | R1. | Test Procedures — The Responsible Entity shall ensure that new Cyber Assets and significant changes to existing Cyber Assets within the Electronic Security Perimeter do not adversely affect existing cyber security controls. For purposes of Standard CIP-007-4, a significant change shall, at a minimum, include implementation of security patches, cumulative service packs, vendor releases, and version upgrades of operating systems, applications, database platforms, or other third- | N/A | N/A | N/A | The Responsible Entity did not ensure the prevention of adverse affects described in R1, by not including the required minimum significant changes. OR The Responsible Entity did not address one or more of the following: |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | party software or firmware. | | | | R1.1, R1.2, R1.3. |
| CIP-007-4 | R1.1. | The Responsible Entity shall create, implement, and maintain cyber security test procedures in a manner that minimizes adverse effects on the production system or its operation. | N/A | N/A | N/A | N/A |
| CIP-007-4 | R1.2. | The Responsible Entity shall document that testing is performed in a manner that reflects the production environment. | N/A | N/A | N/A | N/A |
| CIP-007-4 | R1.3. | The Responsible Entity shall document test results. | N/A | N/A | N/A | N/A |
| CIP-007-4 | R2. | Ports and Services — The Responsible Entity shall establish, document and implement a process to ensure that only those ports and services required for normal and emergency operations are enabled. | N/A | N/A | N/A | The Responsible Entity did not establish (implement) or did not document a process to ensure that only those ports and services required for normal and emergency operations are enabled. |
| CIP-007-4 | R2.1. | The Responsible Entity shall enable only those ports and services required for normal and emergency operations. | N/A | N/A | N/A | The Responsible Entity enabled one or more ports or services not required for normal and emergency operations on Cyber Assets inside the Electronic Security Perimeter(s). |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-007-4 | R2.2. | The Responsible Entity shall disable other ports and services, including those used for testing purposes, prior to production use of all Cyber Assets inside the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not disable one or more other ports or services, including those used for testing purposes, prior to production use for Cyber Assets inside the Electronic Security Perimeter(s). |
| CIP-007-4 | R2.3. | In the case where unused ports and services cannot be disabled due to technical limitations, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | N/A | N/A | N/A | For cases where unused ports and services cannot be disabled due to technical limitations, the Responsible Entity did not document compensating measure(s) applied to mitigate risk. |
| CIP-007-4 | R3. | Security Patch Management — The Responsible Entity, either separately or as a component of the documented configuration management process specified in CIP-003-4 Requirement R6, shall establish, document and implement a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not establish (implement) or did not document , either separately or as a component of the documented configuration management process specified in CIP-003-4 Requirement R6, a |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). |
| CIP-007-4 | R3.1. | The Responsible Entity shall document the assessment of security patches and security upgrades for applicability within thirty calendar days of availability of the patches or upgrades. | N/A | N/A | N/A | The Responsible Entity did not document the assessment of security patches and security upgrades for applicability as required in Requirement R3 within 30 calendar days after the availability of the patches and upgrades. |
| CIP-007-4 | R3.2. | The Responsible Entity shall document the implementation of security patches. In any case where the patch is not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | N/A | N/A | N/A | The Responsible Entity did not document the implementation of applicable security patches as required in R3. OR Where an applicable patch was not |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | installed, the Responsible Entity did not document the compensating measure(s) applied to mitigate risk. |
| CIP-007-4 | R4. | Malicious Software Prevention — The Responsible Entity shall use anti- virus software and other malicious software ("malware") prevention tools, where technically feasible, to detect, prevent, deter, and mitigate the introduction, exposure, and propagation of malware on all Cyber Assets within the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity, where technically feasible, did not use anti- virus software or other malicious software ("malware") prevention tools, on <u>one</u> or more Cyber Assets within the Electronic Security Perimeter(s). |
| CIP-007-4 | R4.1. | The Responsible Entity shall document and implement anti-virus and malware prevention tools. In the case where anti-virus software and malware prevention tools are not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | N/A | N/A | N/A | The Responsible Entity did not document the implementation of antivirus and malware prevention tools for cyber assets within the electronic security perimeter. OR The Responsible Entity did not document the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | compensating measure(s) applied to mitigate risk exposure where antivirus and malware prevention tools are not installed. |
| CIP-007-4 | R4.2. | The Responsible Entity shall document and implement a process for the update of anti-virus and malware prevention "signatures." The process must address testing and installing the signatures. | N/A | N/A | N/A | The Responsible Entity did not document or did not implement a process including addressing testing and installing the signatures for the update of anti-virus and malware prevention "signatures." |
| CIP-007-4 | R5. | Account Management — The Responsible Entity shall establish, implement, and document technical and procedural controls that enforce access authentication of, and accountability for, all user activity, and that minimize the risk of unauthorized system access. | N/A | N/A | N/A | The Responsible Entity did not document or did not implement technical and procedural controls that enforce access authentication of, and accountability for, all user activity. |
| CIP-007-4 | R5.1. | The Responsible Entity shall ensure that individual and shared system accounts and authorized access permissions are consistent with the concept of "need to know" with respect to work functions | N/A | N/A | N/A | The Responsible Entity did not ensure that individual and shared system accounts and authorized access |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | performed. | | | | permissions are consistent with the concept of "need to know" with respect to work functions performed. |
| CIP-007-4 | R5.1.1. | The Responsible Entity shall ensure that user accounts are implemented as approved by designated personnel. Refer to Standard CIP- 003-4 Requirement R5. | N/A | N/A | N/A | One or more user accounts implemented by the Responsible Entity were not implemented as approved by designated personnel. |
| CIP-007-4 | R5.1.2. | The Responsible Entity shall establish methods, processes, and procedures that generate logs of sufficient detail to create historical audit trails of individual user account access activity for a minimum of ninety days. | N/A | The Responsible Entity generated logs with sufficient detail to create historical audit trails of individual user account access activity, however the logs do not contain activity for a minimum of 90 days. | The Responsible Entity generated logs with insufficient detail to create historical audit trails of individual user account access activity. | The Responsible Entity did not generate logs of individual user account access activity. |
| CIP-007-4 | R5.1.3. | The Responsible Entity shall review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003-4 Requirement R5 and Standard CIP- 004-4 Requirement R4. | N/A | N/A | N/A | The Responsible Entity did not review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003-4 Requirement |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | R5 and Standard CIP-004-4 Requirement R4. |
| CIP-007-4 | R5.2. | The Responsible Entity shall implement a policy to minimize and manage the scope and acceptable use of administrator, shared, and other generic account privileges including factory default accounts. | N/A | N/A | N/A | The Responsible Entity did not implement a policy to minimize and manage the scope and acceptable use of administrator, shared, and other generic account privileges including factory default accounts. |
| CIP-007-4 | R5.2.1. | The policy shall include the removal, disabling, or renaming of such accounts where possible. For such accounts that must remain enabled, passwords shall be changed prior to putting any system into service. | N/A | N/A | The Responsible Entity's policy did not include the removal, disabling, or renaming of such accounts where possible, however for accounts that must remain enabled, passwords were changed prior to putting any system into service. | For accounts that must remain enabled, the Responsible Entity did not change passwords prior to putting any system into service. |
| CIP-007-4 | R5.2.2. | The Responsible Entity shall identify those individuals with access to shared accounts. | N/A | N/A | N/A | The Responsible Entity did not identify all individuals with access to shared accounts. |
| CIP-007-4 | R5.2.3. | Where such accounts must be shared, the Responsible Entity shall | N/A | N/A | N/A | Where such |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | have a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps for securing the account in the event of personnel changes (for example, change in assignment or termination). | | | | accounts must be shared, the Responsible Entity has not implemented (one or more components of) a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps for securing the account in the event of personnel changes (for example, change in assignment or termination). |
| CIP-007-4 | R5.3. | At a minimum, the Responsible Entity shall require and use passwords, subject to the following, as technically feasible: | N/A | N/A | N/A | The Responsible Entity does not require passwords subject to R5.3.1, R5.3.2, R5.3.3. OR Does not use passwords subject to R5.3.1, R5.3.2, R5.3.3. |
| CIP-007-4 | R5.3.1. | Each password shall be a minimum of six characters. | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-007-4 | R5.3.2. | Each password shall consist of a combination of alpha, numeric, and "special" characters. | N/A | N/A | N/A | N/A |
| CIP-007-4 | R5.3.3. | Each password shall be changed at least annually, or more frequently based on risk. | N/A | N/A | N/A | N/A |
| CIP-007-4 | R6. | Security Status Monitoring — The Responsible Entity shall ensure that all Cyber Assets within the Electronic Security Perimeter, as technically feasible, implement automated tools or organizational process controls to monitor system events that are related to cyber security. | N/A | N/A | N/A | The Responsible Entity as technically feasible, did not implement automated tools or organizational process controls, to monitor system events that are related to cyber security on one or more of Cyber Assets inside the Electronic Security Perimeter(s). |
| CIP-007-4 | R6.1. | The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter. |
| CIP-007-4 | R6.2. | The security monitoring controls | N/A | N/A | N/A | The Responsible |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | shall issue automated or manual alerts for detected Cyber Security Incidents. | | | | entity's security monitoring controls do not issue automated or manual alerts for detected Cyber Security Incidents. |
| CIP-007-4 | R6.3. | The Responsible Entity shall maintain logs of system events related to cyber security, where technically feasible, to support incident response as required in Standard CIP-008-4. | N/A | N/A | N/A | The Responsible Entity did not maintain logs of system events related to cyber security, where technically feasible, to support incident response as required in Standard CIP-008. |
| CIP-007-4 | R6.4. | The Responsible Entity shall retain all logs specified in Requirement R6 for ninety calendar days. | N/A | N/A | N/A | The Responsible Entity did not retain one or more of the logs specified in Requirement R6 for at least 90 calendar days. |
| CIP-007-4 | R6.5. | The Responsible Entity shall review logs of system events related to cyber security and maintain records documenting review of logs. | N/A | N/A | N/A | The Responsible Entity did not review logs of system events related to cyber security nor maintain records documenting review of logs. |
| CIP-007-4 | R7. | Disposal or Redeployment — The Responsible Entity shall establish | N/A | N/A | The Responsible Entity established | The Responsible Entity did not |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | and implement formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-4. | | | and implemented formal methods, processes, and procedures for redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-4 but did not address redeployment as specified in R7.2. | establish or implement formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-4. OR The Responsible Entity established formal methods, processes, and procedures for redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-4 but did not address disposal as specified in R7.1. OR |
| | | | | | | Entity did not |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | maintain records pertaining to disposal or[³] redeployment as specified in R7.3. |
| CIP-007-4 | R7.1. | Prior to the disposal of such assets, the Responsible Entity shall destroy or erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | N/A | N/A | N/A | N/A |
| CIP-007-4 | R7.2. | Prior to redeployment of such assets, the Responsible Entity shall, at a minimum, erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | N/A | N/A | N/A | N/A |
| CIP-007-4 | R7.3. | The Responsible Entity shall maintain records that such assets were disposed of or redeployed in accordance with documented procedures. | N/A | N/A | N/A | N/A |
| CIP-007-4 | R8 | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of all Cyber Assets within the Electronic Security Perimeter at least annually. The vulnerability assessment shall include, at a minimum, the following: | N/A | N/A | N/A | The Responsible Entity did not perform a Vulnerability Assessment on one or more Cyber Assets within the Electronic Security Perimeter at least annually. |

³ Please note that FERC's January 20, 2011 Order on Version 2 And Version 3 Violation Risk Factors And Violation Severity Levels For Critical Infrastructure Protection Reliability Standards dictated that this should read "…records pertaining to disposal **of** redeployment as specified in R7.3." (Emphasis added) It has come to NERC's attention that it should read "…records pertaining to disposal **or** redeployment as specified in R7.3." (Emphasis added) and NERC has made this change accordingly. NERC proposes to remove this footnote from the final approved list of VSLs.

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | OR The vulnerability assessment did not include one (1) or more of the subrequirements 8.1, 8.2, 8.3, 8.4. |
| CIP-007-4 | R8.1. | A document identifying the vulnerability assessment process; | N/A | N/A | N/A | N/A |
| CIP-007-4 | R8.2. | A review to verify that only ports and services required for operation of the Cyber Assets within the Electronic Security Perimeter are enabled; | N/A | N/A | N/A | N/A |
| CIP-007-4 | R8.3. | A review of controls for default accounts; and, | N/A | N/A | N/A | N/A |
| CIP-007-4 | R8.4. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | N/A | N/A | N/A | N/A |
| CIP-007-4 | R9 | Documentation Review and Maintenance — The Responsible Entity shall review and update the documentation specified in Standard CIP-007-4 at least annually. Changes resulting from modifications to the systems or controls shall be documented within thirty calendar days of the change being completed. | N/A | N/A | The Responsible Entity did not review and update the documentation specified in Standard CIP-007-4 at least annually. OR The Responsible Entity did not document changes resulting from modifications to the | The Responsible Entity did not review and update the documentation specified in Standard CIP-007-4 at least annually and changes resulting from modifications to the systems or controls were not documented within thirty calendar days of the change being |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | systems or controls within thirty calendar days of the change being completed. | completed. |
| CIP-008-4 | R1. | Cyber Security Incident Response Plan — The Responsible Entity shall develop and maintain a Cyber Security Incident response plan and implement the plan in response to Cyber Security Incidents. The Cyber Security Incident response plan shall address, at a minimum, the following: | N/A | N/A | The Responsible Entity has developed a Cyber Security Incident response plan that addresses all of the components required by R1.1 through R1.6 but has not maintained the plan in accordance with those components. | The Responsible Entity has not developed a Cyber Security Incident response plan that addresses all of the components required by R1.1 through R1.6, or has not implemented the plan in response to a Cyber Security Incident. |
| CIP-008-4 | R1.1. | Procedures to characterize and classify events as reportable Cyber Security Incidents. | N/A | N/A | N/A | N/A |
| CIP-008-4 | R1.2. | Response actions, including roles and responsibilities of Cyber Security Incident response teams, Cyber Security Incident handling procedures, and communication plans. | N/A | N/A | N/A | N/A |
| CIP-008-4 | R1.3. | Process for reporting Cyber Security Incidents to the Electricity Sector Information Sharing and Analysis Center (ES-ISAC). The Responsible Entity must ensure that all reportable Cyber Security Incidents are reported to the ES-ISAC either directly or through an intermediary. | N/A | N/A | N/A | N/A |
| CIP-008-4 | R1.4. | Process for updating the Cyber | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | Security Incident response plan within thirty calendar days of any changes. | | | | |
| CIP-008-4 | R1.5. | Process for ensuring that the Cyber Security Incident response plan is reviewed at least annually. | N/A | N/A | N/A | N/A |
| CIP-008-4 | R1.6. | Process for ensuring the Cyber Security Incident response plan is tested at least annually. A test of the Cyber Security Incident response plan can range from a paper drill, to a full operational exercise, to the response to an actual incident. | N/A | N/A | N/A | N/A |
| CIP-008-4 | R2 | Cyber Security Incident Documentation — The Responsible Entity shall keep relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 for three calendar years. | N/A | N/A | N/A | The Responsible Entity has not kept relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 for at least three calendar years. |
| CIP-009-4 | R1 | Recovery Plans — The Responsible Entity shall create and annually review recovery plan(s) for Critical Cyber Assets. The recovery plan(s) shall address at a minimum the following: | N/A | N/A | N/A | The Responsible Entity has not created or has not annually reviewed their recovery plan(s) for Critical Cyber Assets OR has created a plan but did not address one or more of the requirements CIP- 009-4 R1.1 and R1.2. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-009-4 | R1.1. | Specify the required actions in response to events or conditions of varying duration and severity that would activate the recovery plan(s). | N/A | N/A | N/A | N/A |
| CIP-009-4 | R1.2. | Define the roles and responsibilities of responders. | N/A | N/A | N/A | N/A |
| CIP-009-4 | R2 | Exercises — The recovery plan(s) shall be exercised at least annually. An exercise of the recovery plan(s) can range from a paper drill, to a full operational exercise, to recovery from an actual incident. | N/A | N/A | N/A | The Responsible Entity's recovery plan(s) have not been exercised at least annually. |
| CIP-009-4 | R3 | Change Control — Recovery plan(s) shall be updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. Updates shall be communicated to personnel responsible for the activation and implementation of the recovery plan(s) within thirty calendar days of the change being completed. | N/A | N/A | N/A | The Responsible Entity's recovery plan(s) have not been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. OR The Responsible Entity's recovery plan(s) have been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident but the updates |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | were not communicated to personnel responsible for the activation and implementation of the recovery plan(s) within thirty calendar days of the change. |
| CIP-009-4 | R4 | Backup and Restore — The recovery plan(s) shall include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. For example, backups may include spare electronic components or equipment, written documentation of configuration settings, tape backup, etc. | N/A | N/A | N/A | The Responsible Entity's recovery plan(s) do not include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. |
| CIP-009-4 | R5 | Testing Backup Media — Information essential to recovery that is stored on backup media shall be tested at least annually to ensure that the information is available. Testing can be completed off site. | N/A | N/A | N/A | The Responsible Entity's information essential to recovery that is stored on backup media has not been tested at least annually to ensure that the information is available. |

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| CIP-002-4 | R1. | Critical Asset Identification — The Responsible Entity shall develop a list of its identified Critical Assets determined through an annual application of the criteria contained in <i>CIP-002-4 Attachment 1 – Critical Asset Criteria</i> . The Responsible Entity shall update this list as necessary, and review it at least annually. | HIGH |
| CIP-002-4 | R2. | Critical Cyber Asset Identification — Using the list of Critical Assets developed pursuant to Requirement R1, the Responsible Entity shall develop a list of associated Critical Cyber Assets essential to the operation of the Critical Asset. The Responsible Entity shall update this list as necessary, and review it at least annually. For each group of generating units (including nuclear generation) at a single plant location identified in Attachment 1, criterion 1.1, the only Cyber Assets that must be considered are those shared Cyber Assets that could, within 15 minutes, adversely impact the reliable operation of any combination of units that in aggregate equal or exceed Attachment 1, criterion For the purpose of Standard CIP 002-4, Critical Cyber Assets are further qualified to be those having at least one of the following characteristics: The Cyber Asset uses a routable protocol to communicate outside the Electronic Security Perimeter; or, The Cyber Asset uses a routable protocol within a control center; or, The Cyber Asset is dial-up accessible. | HIGH |
| CIP-002-4 | R3. | Annual Approval —The senior manager or delegate(s) shall approve annually the list of Critical Assets and the list of Critical Cyber Assets. Based on Requirements R1 and R2 the Responsible Entity may determine that it has no Critical Assets or Critical Cyber Assets. The Responsible Entity shall keep a signed and dated record of the senior manager or delegate(s)'s | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| | | approval of the list of Critical Assets and the list of Critical Cyber Assets (even if such lists are null.) | |
| CIP-003-4 | R1. | Cyber Security Policy — The Responsible Entity shall document and implement a cyber security policy that represents management's commitment and ability to secure its Critical | MEDIUM |
| | | Cyber Assets. The Responsible Entity shall, at minimum, ensure the following: | |
| CIP-003-4 | R1.1. | The cyber security policy addresses the requirements in Standards CIP-002-4 through CIP-009-4, including provision for emergency situations. | LOWER |
| CIP-003-4 | R1.2. | The cyber security policy is readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets. | LOWER |
| CIP-003-4 | R1.3 | Annual review and approval of the cyber security policy by the senior manager assigned pursuant to R2. | LOWER |
| CIP-003-4 | R2. | Leadership — The Responsible Entity shall assign a senior manager with overall responsibility for leading and managing the entity's implementation of, and adherence to, Standards CIP-002-4 through CIP-009-4. | MEDIUM |
| CIP-003-4 | R2.1. | The senior manager shall be identified by name, title, and date of designation. | LOWER |
| CIP-003-4 | R2.2. | Changes to the senior manager must be documented within thirty calendar days of the effective date. | LOWER |
| CIP-003-4 | R2.3. | Where allowed by Standards CIP-002-4 through CIP-009-4, the senior manager may delegate authority for specific actions to a named delegate or delegates. These delegations shall be documented in the same manner as R2.1 and R2.2, and approved by the senior manager. | LOWER |
| CIP-003-4 | R2.4 | The senior manager or delegate(s), shall authorize and document any exception from the requirements of the cyber security policy. | LOWER |
| CIP-003-4 | R3. | Exceptions — Instances where the Responsible Entity cannot conform to its cyber security policy must be documented as exceptions and authorized by the senior manager or delegate(s). | LOWER |
| CIP-003-4 | R3.1. | Exceptions to the Responsible Entity's cyber security policy must be documented within thirty days of being approved by the senior manager or delegate(s). | LOWER |
| CIP-003-4 | R3.2. | Documented exceptions to the cyber security policy must include an explanation as to why the exception is necessary and any compensating measures. | LOWER |
| CIP-003-4 | R3.3. | Authorized exceptions to the cyber security policy must be reviewed and approved annually by the senior manager or delegate(s) to ensure the exceptions are still required and valid. Such review and approval shall be documented. | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| CIP-003-4 | R4. | Information Protection — The Responsible Entity shall implement and document a program to identify, classify, and protect information associated with Critical Cyber Assets. | MEDIUM |
| CIP-003-4 | R4.1. | The Critical Cyber Asset information to be protected shall include, at a minimum and regardless of media type, operational procedures, lists as required in Standard CIP-002-4, network topology or similar diagrams, floor plans of computing centers that contain Critical Cyber Assets, equipment layouts of Critical Cyber Assets, disaster recovery plans, incident response plans, and security configuration information. | MEDIUM |
| CIP-003-4 | R4.2. | The Responsible Entity shall classify information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. | LOWER |
| CIP-003-4 | R4.3. | The Responsible Entity shall, at least annually, assess adherence to its Critical Cyber Asset information protection program, document the assessment results, and implement an action plan to remediate deficiencies identified during the assessment. | LOWER |
| CIP-003-4 | R5. | Access Control — The Responsible Entity shall document and implement a program for managing access to protected Critical Cyber Asset information. | LOWER |
| CIP-003-4 | R5.1. | The Responsible Entity shall maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information. | LOWER |
| CIP-003-4 | R5.1.1. | Personnel shall be identified by name, title, and the information for which they are responsible for authorizing access. | LOWER |
| CIP-003-4 | R5.1.2. | The list of personnel responsible for authorizing access to protected information shall be verified at least annually. | LOWER |
| CIP-003-4 | R5.2. | The Responsible Entity shall review at least annually the access privileges to protected information to confirm that access privileges are correct and that they correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities. | LOWER |
| CIP-003-4 | R5.3. | The Responsible Entity shall assess and document at least annually the processes for controlling access privileges to protected information. | LOWER |
| CIP-003-4 | R6. | Change Control and Configuration Management — The Responsible Entity shall establish and document a process of change control and configuration management for adding, modifying, replacing, or removing Critical Cyber Asset hardware or software, and implement supporting configuration management activities to identify, control and document all entity or vendor related changes to hardware and software components of Critical Cyber Assets pursuant to the change control process. | LOWER |
| CIP-004-4 | R1. | Awareness — The Responsible Entity shall establish, document, implement, and maintain a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security practices. The program shall include security awareness reinforcement on at least a quarterly basis using mechanisms such as: | LOWER |

| Standard Requirement Number Number | | Text of Requirement | VRF |
|---------------------------------------|---------|--|--------|
| | | 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.). | |
| CIP-004-4 | R2. | Training — The Responsible Entity shall establish, document, implement, and maintain an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. The cyber security training program shall be reviewed annually, at a minimum, and shall be updated whenever necessary. | LOWER |
| CIP-004-4 | R2.1. | This program will ensure that all personnel having such access to Critical Cyber Assets, including contractors and service vendors, are trained prior to their being granted such access except in specified circumstances such as an emergency. | MEDIUM |
| CIP-004-4 | R2.2. | Training shall cover the policies, access controls, and procedures as developed for the Critical Cyber Assets covered by CIP-004-4, and include, at a minimum, the following required items appropriate to personnel roles and responsibilities: | MEDIUM |
| CIP-004-4 | R2.2.1. | The proper use of Critical Cyber Assets; | LOWER |
| CIP-004-4 | R2.2.2. | Physical and electronic access controls to Critical Cyber Assets; | LOWER |
| CIP-004-4 | R2.2.3. | The proper handling of Critical Cyber Asset information; and, | LOWER |
| CIP-004-4 | R2.2.4. | Action plans and procedures to recover or re-establish Critical Cyber Assets and access thereto following a Cyber Security Incident. | MEDIUM |
| CIP-004-4 | R2.3. | The Responsible Entity shall maintain documentation that training is conducted at least annually, including the date the training was completed and attendance records. | LOWER |
| CIP-004-4 | R3. | Personnel Risk Assessment —The Responsible Entity shall have a documented personnel risk assessment program, in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements, for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. A personnel risk assessment shall be conducted pursuant to that program prior to such personnel being granted such access except in specified circumstances such as an emergency. The personnel risk assessment program shall at a minimum include: | MEDIUM |
| CIP-004-4 | R3.1. | The Responsible Entity shall ensure that each assessment conducted include, at least, identity verification (e.g., Social Security Number verification in the U.S.) and seven year criminal check. The Responsible Entity may conduct more detailed reviews, as permitted by law and subject to existing collective bargaining unit agreements, depending upon the criticality of the position. | LOWER |

| Standard Requirement Number Number | | Text of Requirement | VRF | |
|---------------------------------------|-------|---|--------|--|
| CIP-004-4 | R3.2. | The Responsible Entity shall update each personnel risk assessment at least every seven years after the initial personnel risk assessment or for cause. | LOWER | |
| CIP-004-4 | R3.3. | The Responsible Entity shall document the results of personnel risk assessments of its personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets, and that personnel risk assessments of contractor and service vendor personnel with such access are conducted pursuant to Standard CIP-004-4. | LOWER | |
| CIP-004-4 | R4. | Access — The Responsible Entity shall maintain list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets. | LOWER | |
| CIP-004-4 | R4.1. | The Responsible Entity shall review the list(s) of its personnel who have such access to Critical Cyber Assets quarterly, and update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, or any change in the access rights of such personnel. The Responsible Entity shall ensure access list(s) for contractors and service vendors are properly maintained. | LOWER | |
| CIP-004-4 | R4.2. | The Responsible Entity shall revoke such access to Critical Cyber Assets within 24 hours for personnel terminated for cause and within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. | LOWER | |
| CIP-005-4 | R1. | Electronic Security Perimeter — The Responsible Entity shall ensure that every Critical Cyber Asset resides within an Electronic Security Perimeter. The Responsible Entity shall identify and document the Electronic Security Perimeter(s) and all access points to the perimeter(s). | MEDIUM | |
| CIP-005-4 | R1.1. | Access points to the Electronic Security Perimeter(s) shall include any externally connected communication end point (for example, dial-up modems) terminating at any device within the Electronic Security Perimeter(s). | MEDIUM | |
| CIP-005-4 | R1.2. | For a dial-up accessible Critical Cyber Asset that uses a non-routable protocol, the Responsible Entity shall define an Electronic Security Perimeter for that single access point at the dial-up device. | MEDIUM | |
| CIP-005-4 | R1.3. | Communication links connecting discrete Electronic Security Perimeters shall not be considered part of the Electronic Security Perimeter. However, end points of these communication links within the Electronic Security Perimeter(s) shall be considered access points to the Electronic Security Perimeter(s). | MEDIUM | |
| CIP-005-4 | R1.4. | Any non-critical Cyber Asset within a defined Electronic Security Perimeter shall be identified and protected pursuant to the requirements of Standard CIP-005-4. | MEDIUM | |
| CIP-005-4 | | | MEDIUM | |

| Standard Number | Requirement Number | Text of Requirement | VRF | |
|--------------------|-----------------------|--|--------|--|
| | | through R9; Standard CIP-008-4; and Standard CIP-009-4. | | |
| CIP-005-4 | R1.6. | The Responsible Entity shall maintain documentation of Electronic Security Perimeter(s), all interconnected Critical and non-critical Cyber Assets within the Electronic Security Perimeter(s), all electronic access points to the Electronic Security Perimeter(s) and the Cyber Assets deployed for the access control and monitoring of these access points. | LOWER | |
| CIP-005-4 | R2. | Electronic Access Controls — The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s). | MEDIUM | |
| CIP-005-4 | R2.1. | These processes and mechanisms shall use an access control model that denies access by default, such that explicit access permissions must be specified. | MEDIUM | |
| CIP-005-4 | R2.2. | At all access points to the Electronic Security Perimeter(s), the Responsible Entity shall enable only ports and services required for operations and for monitoring Cyber Assets within the Electronic Security Perimeter, and shall document, individually or by specified grouping, the configuration of those ports and services. | MEDIUM | |
| CIP-005-4 | R2.3. | The Responsible Entity shall implement and maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s). | MEDIUM | |
| CIP-005-4 | R2.4. | Where external interactive access into the Electronic Security Perimeter has been enabled, the Responsible Entity shall implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible. | MEDIUM | |
| CIP-005-4 | R2.5. | The required documentation shall, at least, identify and describe: | LOWER | |
| CIP-005-4 | R2.5.1. | The processes for access request and authorization. | LOWER | |
| CIP-005-4 | R2.5.2. | The authentication methods. | LOWER | |
| CIP-005-4 | R2.5.3. | The review process for authorization rights, in accordance with Standard CIP-004-4 Requirement R4. | LOWER | |
| CIP-005-4 | R2.5.4. | The controls used to secure dial-up accessible connections. | LOWER | |
| CIP-005-4 | R2.6. | Appropriate Use Banner — Where technically feasible, electronic access controlLOWEdevices shall display an appropriate use banner on the user screen upon all interactiveaccess attempts. The Responsible Entity shall maintain a document identifying the content of the banner.content of the banner. | | |
| CIP-005-4 | R3. | Monitoring Electronic Access — The Responsible Entity shall implement and document an electronic or manual process(es) for monitoring and logging access at access points to the Electronic Security Perimeter(s) twenty-four hours a day, seven days a week. | MEDIUM | |

| Standard Number | Requirement Number | Text of Requirement | VRF | |
|--------------------|-----------------------|--|--------|--|
| CIP-005-4 | R3.1. | For dial-up accessible Critical Cyber Assets that use non-routable protocols, the Responsible Entity shall implement and document monitoring process(es) at each access point to the dial-up device, where technically feasible. | MEDIUM | |
| CIP-005-4 | R3.2. | Where technically feasible, the security monitoring process(es) shall detect and alert for attempts at or actual unauthorized accesses. These alerts shall provide for appropriate notification to designated response personnel. Where alerting is not technically feasible, the Responsible Entity shall review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. | MEDIUM | |
| CIP-005-4 | R4. | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of the electronic access points to the Electronic Security Perimeter(s) at least annually. The vulnerability assessment shall include, at a minimum, the following: | MEDIUM | |
| CIP-005-4 | R4.1. | A document identifying the vulnerability assessment process; | LOWER | |
| CIP-005-4 | R4.2. | A review to verify that only ports and services required for operations at these access points are enabled; | MEDIUM | |
| CIP-005-4 | R4.3. | The discovery of all access points to the Electronic Security Perimeter; | MEDIUM | |
| CIP-005-4 | R4.4. | A review of controls for default accounts, passwords, and network management community strings; | MEDIUM | |
| CIP-005-4 | R4.5. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | MEDIUM | |
| CIP-005-4 | R5. | Documentation Review and Maintenance — The Responsible Entity shall review, update, and maintain all documentation to support compliance with the requirements of Standard CIP-005-4. | LOWER | |
| CIP-005-4 | R5.1. | The Responsible Entity shall ensure that all documentation required by Standard CIP- 005-4 reflect current configurations and processes and shall review the documents and procedures referenced in Standard CIP-005-4 at least annually. | LOWER | |
| CIP-005-4 | R5.2. | The Responsible Entity shall update the documentation to reflect the modification of the network or controls within ninety calendar days of the change. | LOWER | |
| CIP-005-4 | R5.3. | The Responsible Entity shall retain electronic access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-4. | LOWER | |
| CIP-006-4c | R1. | Physical Security Plan — The Responsible Entity shall document, implement, and maintain a physical security plan, approved by the senior manager or delegate(s) that shall address, at a minimum, the following: | MEDIUM | |

| Standard Number | Requirement Number | Text of Requirement | VRF | |
|--------------------|--|--|--------|--|
| CIP-006-4c | All Cyber Assets within an Electronic Security Perimeter shall reside within an identified Physical Security Perimeter. Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity shall deploy and document alternative measures to control physical access to such Cyber Assets. | | MEDIUM | |
| CIP-006-4c | R1.2. | Identification of all physical access points through each Physical Security Perimeter and measures to control entry at those access points. | MEDIUM | |
| CIP-006-4c | R1.3 | Processes, tools, and procedures to monitor physical access to the perimeter(s). | MEDIUM | |
| CIP-006-4c | R1.4 | Appropriate use of physical access controls as described in Requirement R4 including visitor pass management, response to loss, and prohibition of inappropriate use of physical access controls. | MEDIUM | |
| CIP-006-4c | R1.5 | Review of access authorization requests and revocation of access authorization, in accordance with CIP-004-4 Requirement R4. | MEDIUM | |
| CIP-006-4c | R1.6 | A visitor control program for visitors (personnel without authorized unescorted access to a Physical Security Perimeter), containing at a minimum the following: | MEDIUM | |
| CIP-006-4c | R1.6.1 | Logs (manual or automated) to document the entry and exit of visitors, including the date and time, to and from Physical Security Perimeters. | MEDIUM | |
| CIP-006-4c | R1.6.2 | Continuous escorted access of visitors within the Physical Security Perimeter | MEDIUM | |
| CIP-006-4c | R1.7 | Update of the physical security plan within thirty calendar days of the completion of any physical security system redesign or reconfiguration, including, but not limited to, addition or removal of access points through the Physical Security Perimeter, physical access controls, monitoring controls, or logging controls. | LOWER | |
| CIP-006-4c | R1.8 | Annual review of the physical security plan. | LOWER | |
| CIP-006-4c | R2 | Protection of Physical Access Control Systems — Cyber Assets that authorize and/or log access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers, shall: | MEDIUM | |
| CIP-006-4c | R2.1. | Be protected from unauthorized physical access. | MEDIUM | |
| CIP-006-4c | R2.2. | Be afforded the protective measures specified in Standard CIP-003-4; Standard CIP-004-4 Requirement R3; Standard CIP-005-4 Requirements R2 and R3; Standard CIP-006-4a Requirements R4 and R5; Standard CIP-007-4; Standard CIP-008-4; and Standard CIP- 009-4. | MEDIUM | |
| CIP-006-4c | R3 | Protection of Electronic Access Control Systems — Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall reside within an | MEDIUM | |

| Standard Requirement Number Number | | Text of Requirement | VRF |
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| rumber | Humber | identified Physical Security Perimeter. | |
| CIP-006-4c | R4 | Physical Access Controls — The Responsible Entity shall document and implement the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. The Responsible Entity shall implement one or more of the following physical access methods: Card Key: A means of electronic access where the access rights of the card | MEDIUM |
| | | holder are predefined in a computer database. Access rights may differ from one perimeter to another. | |
| | | Special Locks: These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. | |
| | | • Security Personnel: Personnel responsible for controlling physical access who may reside on-site or at a monitoring station. | |
| | | Other Authentication Devices: Biometric, keypad, token, or other equivalent devices that control physical access to the Critical Cyber Assets | |
| CIP-006-4c | R5 | Monitoring Physical Access — The Responsible Entity shall document and implement the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. Unauthorized access attempts shall be reviewed immediately and handled in accordance with the procedures specified in Requirement CIP-008-4. One or more of the following monitoring methods shall be used: | MEDIUM |
| | | • Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel responsible for response. | |
| | | • Human Observation of Access Points: Monitoring of physical access points by authorized personnel as specified in Requirement R4. | |
| CIP-006-4c | R6 | Logging Physical Access — Logging shall record sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. The Responsible Entity shall implement and document the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: | LOWER |
| | | Computerized Logging: Electronic logs produced by the Responsible Entity's | |

| Standard Requirement Number Number | | Text of Requirement | VRF | |
|---------------------------------------|-------|--|--------|--|
| | | selected access control and monitoring method. | | |
| | | • Video Recording: Electronic capture of video images of sufficient quality to determine identity. | | |
| | | Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4 | | |
| CIP-006-4c | R7 | Access Log Retention — The responsible entity shall retain physical access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-4. | LOWER | |
| CIP-006-4c | R8 | Maintenance and Testing — The Responsible Entity shall implement a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly. The program must include, at a minimum, the following: | MEDIUM | |
| CIP-006-4c | R8.1 | Testing and maintenance of all physical security mechanisms on a cycle no longer than three years. | MEDIUM | |
| CIP-006-4c | R8.2 | Retention of testing and maintenance records for the cycle determined by the Responsible Entity in Requirement R8.1. | LOWER | |
| CIP-006-4c | R8.3 | Retention of outage records regarding access controls, logging, and monitoring for a minimum of one calendar year. | LOWER | |
| CIP-007-4 | R1. | Test Procedures — The Responsible Entity shall ensure that new Cyber Assets and significant changes to existing Cyber Assets within the Electronic Security Perimeter do not adversely affect existing cyber security controls. For purposes of Standard CIP-007-4, a significant change shall, at a minimum, include implementation of security patches, cumulative service packs, vendor releases, and version upgrades of operating systems, applications, database platforms, or other third-party software or firmware. | MEDIUM | |
| CIP-007-4 | R1.1. | The Responsible Entity shall create, implement, and maintain cyber security test procedures in a manner that minimizes adverse effects on the production system or its operation. | LOWER | |
| CIP-007-4 | R1.2. | The Responsible Entity shall document that testing is performed in a manner that reflects the production environment. | LOWER | |
| CIP-007-4 | R1.3. | The Responsible Entity shall document test results. | | |
| CIP-007-4 | R2. | Ports and Services — The Responsible Entity shall establish, document and implement a process to ensure that only those ports and services required for normal and emergency operations are enabled. | MEDIUM | |
| CIP-007-4 | R2.1. | The Responsible Entity shall enable only those ports and services required for normal | MEDIUM | |

| Standard Requirement Number Number | | Text of Requirement | VRF | |
|---------------------------------------|---------|--|--------|--|
| | | and emergency operations. | | |
| CIP-007-4 | R2.2. | The Responsible Entity shall disable other ports and services, including those used for | MEDIUM | |
| | | testing purposes, prior to production use of all Cyber Assets inside the Electronic Security Perimeter(s). | | |
| CIP-007-4 | R2.3. | In the case where unused ports and services cannot be disabled due to technical limitations, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | MEDIUM | |
| CIP-007-4 | R3. | Security Patch Management — The Responsible Entity, either separately or as a component of the documented configuration management process specified in CIP-003- 4 Requirement R6, shall establish, document and implement a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | LOWER | |
| CIP-007-4 | R3.1. | The Responsible Entity shall document the assessment of security patches and security upgrades for applicability within thirty calendar days of availability of the patches or upgrades. | LOWER | |
| CIP-007-4 | R3.2. | The Responsible Entity shall document the implementation of security patches. In any case where the patch is not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | LOWER | |
| CIP-007-4 | R4. | Malicious Software Prevention — The Responsible Entity shall use anti-virus software and other malicious software ("malware") prevention tools, where technically feasible, to detect, prevent, deter, and mitigate the introduction, exposure, and propagation of malware on all Cyber Assets within the Electronic Security Perimeter(s). | MEDIUM | |
| CIP-007-4 | R4.1. | The Responsible Entity shall document and implement anti-virus and malware prevention tools. In the case where anti-virus software and malware prevention tools are not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | MEDIUM | |
| CIP-007-4 | R4.2. | The Responsible Entity shall document and implement a process for the update of anti- virus and malware prevention "signatures." The process must address testing and installing the signatures. | MEDIUM | |
| CIP-007-4 | R5. | Account Management — The Responsible Entity shall establish, implement, and document technical and procedural controls that enforce access authentication of, and accountability for, all user activity, and that minimize the risk of unauthorized system access. | LOWER | |
| CIP-007-4 | R5.1. | The Responsible Entity shall ensure that individual and shared system accounts and authorized access permissions are consistent with the concept of "need to know" with respect to work functions performed. | MEDIUM | |
| CIP-007-4 | R5.1.1. | The Responsible Entity shall ensure that user accounts are implemented as approved by | LOWER | |

| Standard Requirement Number Number | | Text of Requirement | VRF | |
|---------------------------------------|---------|---|--------|--|
| Number | Number | designated personnel. Refer to Standard CIP-003-4 Requirement R5. | | |
| CIP-007-4 | R5.1.2. | The Responsible Entity shall establish methods, processes, and procedures that generate logs of sufficient detail to create historical audit trails of individual user account access activity for a minimum of ninety days. | LOWER | |
| CIP-007-4 | R5.1.3. | The Responsible Entity shall review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003-4 Requirement R5 and Standard CIP-004-4 Requirement R4. | MEDIUM | |
| CIP-007-4 | R5.2. | The Responsible Entity shall implement a policy to minimize and manage the scope and acceptable use of administrator, shared, and other generic account privileges including factory default accounts. | LOWER | |
| CIP-007-4 | R5.2.1. | The policy shall include the removal, disabling, or renaming of such accounts where possible. For such accounts that must remain enabled, passwords shall be changed prior to putting any system into service. | MEDIUM | |
| CIP-007-4 | R5.2.2. | The Responsible Entity shall identify those individuals with access to shared accounts. | LOWER | |
| CIP-007-4 | R5.2.3. | Where such accounts must be shared, the Responsible Entity shall have a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps for securing the account in the event of personnel changes (for example, change in assignment or termination). | MEDIUM | |
| CIP-007-4 | R5.3. | At a minimum, the Responsible Entity shall require and use passwords, subject to the following, as technically feasible: | LOWER | |
| CIP-007-4 | R5.3.1. | Each password shall be a minimum of six characters. | LOWER | |
| CIP-007-4 | R5.3.2. | Each password shall consist of a combination of alpha, numeric, and "special" characters. | LOWER | |
| CIP-007-4 | R5.3.3. | Each password shall be changed at least annually, or more frequently based on risk. | MEDIUM | |
| CIP-007-4 | R6. | Security Status Monitoring — The Responsible Entity shall ensure that all Cyber Assets within the Electronic Security Perimeter, as technically feasible, implement automated tools or organizational process controls to monitor system events that are related to cyber security. | LOWER | |
| CIP-007-4 | R6.1. | The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter. | MEDIUM | |
| CIP-007-4 | R6.2. | The security monitoring controls shall issue automated or manual alerts for detected Cyber Security Incidents. | MEDIUM | |
| CIP-007-4 | R6.3. | The Responsible Entity shall maintain logs of system events related to cyber security, where technically feasible, to support incident response as required in Standard CIP-008- 4. | MEDIUM | |

| Standard Number | Requirement Number | Text of Requirement | VRF | |
|--------------------|-----------------------|--|--------|--|
| CIP-007-4 | R6.4. | The Responsible Entity shall retain all logs specified in Requirement R6 for ninety calendar days. | LOWER | |
| CIP-007-4 | R6.5. | The Responsible Entity shall review logs of system events related to cyber security and maintain records documenting review of logs. | LOWER | |
| CIP-007-4 | R7. | Disposal or Redeployment — The Responsible Entity shall establish and implement formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-4. | LOWER | |
| CIP-007-4 | R7.1. | Prior to the disposal of such assets, the Responsible Entity shall destroy or erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | LOWER | |
| CIP-007-4 | R7.2. | Prior to redeployment of such assets, the Responsible Entity shall, at a minimum, erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | LOWER | |
| CIP-007-4 | R7.3. | The Responsible Entity shall maintain records that such assets were disposed of or redeployed in accordance with documented procedures. | LOWER | |
| CIP-007-4 | R8 | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of all Cyber Assets within the Electronic Security Perimeter at least annually. The vulnerability assessment shall include, at a minimum, the following: | LOWER | |
| CIP-007-4 | R8.1. | A document identifying the vulnerability assessment process; | LOWER | |
| CIP-007-4 | R8.2. | A review to verify that only ports and services required for operation of the Cyber Assets within the Electronic Security Perimeter are enabled; | MEDIUM | |
| CIP-007-4 | R8.3. | A review of controls for default accounts; and, | MEDIUM | |
| CIP-007-4 | R8.4. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | MEDIUM | |
| CIP-007-4 | R9 | Documentation Review and Maintenance — The Responsible Entity shall review and update the documentation specified in Standard CIP-007-4 at least annually. Changes resulting from modifications to the systems or controls shall be documented within thirty calendar days of the change being completed. | LOWER | |
| CIP-008-4 | R1. | Cyber Security Incident Response Plan — The Responsible Entity shall develop and maintain a Cyber Security Incident response plan and implement the plan in response to Cyber Security Incidents. The Cyber Security Incident response plan shall address, at a minimum, the following: | LOWER | |
| CIP-008-4 | R1.1. | Procedures to characterize and classify events as reportable Cyber Security Incidents. | LOWER | |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| CIP-008-4 | R1.2. | Response actions, including roles and responsibilities of Cyber Security Incident response teams, Cyber Security Incident handling procedures, and communication plans. | LOWER |
| CIP-008-4 | R1.3. | Process for reporting Cyber Security Incidents to the Electricity Sector Information Sharing and Analysis Center (ES-ISAC). The Responsible Entity must ensure that all reportable Cyber Security Incidents are reported to the ES-ISAC either directly or through an intermediary. | LOWER |
| CIP-008-4 | R1.4. | Process for updating the Cyber Security Incident response plan within thirty calendar days of any changes. | LOWER |
| CIP-008-4 | R1.5. | Process for ensuring that the Cyber Security Incident response plan is reviewed at least annually. | LOWER |
| CIP-008-4 | R1.6. | Process for ensuring the Cyber Security Incident response plan is tested at least annually. A test of the Cyber Security Incident response plan can range from a paper drill, to a full operational exercise, to the response to an actual incident. | LOWER |
| CIP-008-4 | R2 | Cyber Security Incident Documentation — The Responsible Entity shall keep relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 for three calendar years. | LOWER |
| CIP-009-4 | R1 | Recovery Plans — The Responsible Entity shall create and annually review recovery plan(s) for Critical Cyber Assets. The recovery plan(s) shall address at a minimum the following: | MEDIUM |
| CIP-009-4 | R1.1. | Specify the required actions in response to events or conditions of varying duration and severity that would activate the recovery plan(s). | MEDIUM |
| CIP-009-4 | R1.2. | Define the roles and responsibilities of responders. | MEDIUM |
| CIP-009-4 | R2 | Exercises — The recovery plan(s) shall be exercised at least annually. An exercise of the recovery plan(s) can range from a paper drill, to a full operational exercise, to recovery from an actual incident. | LOWER |
| CIP-009-4 | R3 | Change Control — Recovery plan(s) shall be updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. Updates shall be communicated to personnel responsible for the activation and implementation of the recovery plan(s) within thirty calendar days of the change being completed. | LOWER |
| CIP-009-4 | R4 | Backup and Restore — The recovery plan(s) shall include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. For example, backups may include spare electronic components or equipment, written documentation of configuration settings, tape backup, etc. | LOWER |
| CIP-009-4 | R5 | Testing Backup Media — Information essential to recovery that is stored on backupmedia shall be tested at least annually to ensure that the information is available.Testing can be completed off site. | LOWER |

CIP Version 4 Violation Severity Levels and Violation Risk Factors

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|---|---|
| CIP-002-4 | R1. | Critical Asset Identification — The Responsible Entity shall develop a list of its identified Critical Assets determined through an annual application of the criteria contained in <i>CIP-002-4 Attachment 1 – Critical</i> <i>Asset Criteria</i> . The Responsible Entity shall update this list as necessary, and review it at least annually. | N/A | N/A | The Responsible Entity has developed a list of Critical Assets but the list has not been reviewed and updated annually as required. | The Responsible Entity did not develop a list of its identified Critical Assets even if such list is null. |
| CIP-002-4 | R2. | Critical Cyber Asset Identification— Using the list of Critical Assets developed pursuant to Requirement R1, the Responsible Entity shall develop a list of associated Critical Cyber Assets essential to the operation of the Critical Asset. The Responsible Entity shall update this list as necessary, and review it at least annually. For each group of generating units (including nuclear generation) at a single plant location identified in Attachment 1, criterion 1.1, the only Cyber Assets that must be considered are those shared Cyber Assets that could, within 15 minutes, adversely impact the reliable operation of any combination of units that in aggregate equal or exceed Attachment 1, criterion 1.1. | N/A | N/A | The Responsible Entity has developed a list of associated Critical Cyber Assets essential to the operation of the Critical Asset list as per requirement R2 but the list has not been reviewed and updated annually as required. | The Responsible Entity did not develop a list of associated Critical Cyber Assets essential to the operation of the Critical Asset list as per requirement R2 even if such list is null. OR <u>A Cyber Asset essential to the</u> operation of the <u>Critical Asset was</u> identified that met at least one of the bulleted characteristics in this requirement but was not included in the Critical Cyber <u>Asset List.</u> |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|---|---|---|
| | | one of the following characteristics: The Cyber Asset uses a routable protocol to communicate outside the Electronic Security Perimeter; or, The Cyber Asset uses a routable protocol within a control center; or, The Cyber Asset is dial-up accessible. | | | | |
| CIP-002-4 | R3. | Annual Approval —The senior manager or delegate(s) shall approve annually the list of Critical Assets and the list of Critical Cyber Assets. Based on Requirements R1 and R2 the Responsible Entity may determine that it has no Critical Assets or Critical Cyber Assets. The Responsible Entity shall keep a signed and dated record of the senior manager or delegate(s)'s approval of the list of Critical Assets and the list of Critical Cyber Assets (even if such lists are null.) | N/A | <u>N/A</u> The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s)'s annual approval of the risk- based assessment methodology, the list of Critical Assets or the list of Critical Cyber Assets (even if such lists are null.) | The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s)'s annual approval of the list of Critical Assets.ORThe Responsible Entity does not have a signed and dated record of the senior manager or delegate(s)'s annual approval of the list of Critical CyberAssets (even if such lists are null.) The Responsible Entity does not have a signed and dated record of the seniorists are null.) The Responsible Entity does not have a signed and dated record of the senior | The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s)'s annual approval of both the list of Critical Assets and the list of Critical Cyber Assets (even if such lists are null.) The Responsible Entity does not have a signed and dated record of the senior manager or delegate(s) annual approval of 1) A risk based assessment methodology for identification of Critical Assets, 2) a signed and dated approval of the list of Critical Assets, |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|--|---|
| | | | | | approval of two of the following: the risk-based assessment methodology, the list of Critical Assets or the list of Critical Cyber Assets (even if such lists are null.) | nor 3) a signed and dated approval of the list of Critical Cyber Assets (even if such lists are null.) |
| CIP-003-4 | R1. | Cyber Security Policy — The Responsible Entity shall document and implement a cyber security policy that represents management's commitment and ability to secure its Critical Cyber Assets. The Responsible Entity shall, at minimum, ensure the following: | N/A | N/A | N/A | The Responsible Entity has not documented or implemented a cyber security policy. |
| CIP-003-4 | R1.1. | The cyber security policy addresses the requirements in Standards CIP- 002-4 through CIP-009-4, including provision for emergency situations. | N/A | N/A | N/A | The Responsible Entity's cyber security policy does not address all the requirements in Standards CIP-002 through CIP-009, including provision for emergency situations. |
| CIP-003-4 | R1.2. | The cyber security policy is readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets. | N/A | N/A | N/A | The Responsible Entity's cyber security policy is not readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|----------|---|
| CIP-003-4 | R1.3 | Annual review and approval of the cyber security policy by the senior manager assigned pursuant to R2. | N/A | N/A | N/A | The Responsible Entity's senior manager, assigned pursuant to R2, did not complete the annual review and approval of its cyber security policy. |
| CIP-003-4 | R2. | Leadership — The Responsible Entity shall assign a senior manager with overall responsibility for leading and managing the entity's implementation of, and adherence to, Standards CIP-002-4 through CIP- 009-4. | N/A | N/A | N/A | The Responsible Entity has not assigned a single senior manager with overall responsibility and authority for leading and managing the entity's implementation of, and adherence to, Standards CIP-002 through CIP-009. |
| CIP-003-4 | R2.1. | The senior manager shall be identified by name, title, and date of designation. | N/A | N/A | N/A | The senior manager is not identified by name, title, and date of designation. Identification of the senior manager is missing one of the following: name, title, or date of designation. |
| CIP-003-4 | R2.2. | Changes to the senior manager must be documented within thirty calendar days of the effective date. | N/A | N/A | N/A | Changes to the senior manager were not documented within |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|---|---|
| | | | | | | 30 days of the effective date. |
| CIP-003-4 | R2.3. | Where allowed by Standards CIP- 002-4 through CIP-009-4, the senior manager may delegate authority for specific actions to a named delegate or delegates. These delegations shall be documented in the same manner as R2.1 and R2.2, and approved by the senior manager. | N/A | N/A | The identification of a senior manager's delegate does not include at least one of the following; name, title, or date of the designation, OR The document is not approved by the senior manager, OR | A senior manager's delegate is not identified by name, title, and date of designation; the document delegating the authority does not identify the authority being delegated; the document delegating the authority is not approved by the senior manager; |
| | | | | | Changes to the delegated authority are not documented within thirty calendar days of the effective date. | AND changes to the delegated authority are not documented within thirty calendar days of the effective date. |
| CIP-003-4 | R2.4 | The senior manager or delegate(s), shall authorize and document any exception from the requirements of the cyber security policy. | N/A | N/A | N/A | The senior manager or delegate(s) did not authorize and document any exceptions from the requirements of the cyber security policy as required. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|--|--|
| CIP-003-4 | R3. | Exceptions — Instances where the Responsible Entity cannot conform to its cyber security policy must be documented as exceptions and authorized by the senior manager or delegate(s). | N/A | N/A | In Instances where the Responsible Entity cannot conform to its cyber security policy, in R1, exceptions were documented, but were not authorized by the senior manager or delegate(s). | In Instances where the Responsible Entity cannot conform to its cyber security policy, in R1, exceptions were not documented. |
| CIP-003-4 | R3.1. | Exceptions to the Responsible Entity's cyber security policy must be documented within thirty days of being approved by the senior manager or delegate(s). | N/A | N/A | N/A | Exceptions to the Responsible Entity's cyber security policy were not documented within 30 days of being approved by the senior manager or delegate(s). |
| CIP-003-4 | R3.2. | Documented exceptions to the cyber security policy must include an explanation as to why the exception is necessary and any compensating measures. | N/A | N/A | The Responsible Entity has a documented exception to the cyber security policy (pertaining to CIP 002 through CIP 009)in R1 but did not include either : 1) an explanation as to why the exception is necessary, or 2) any compensating | The Responsible Entity has a documented exception to the cyber security policy <u>in R1(pertaining to</u> <u>CIP 002 through CIP</u> 009) but did not include both : 1) an explanation as to why the exception is necessary, and 2) any compensating measures. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--------------|---|---|
| | D D D | Authorized exceptions to the cyber | N/A | N/A | measures. | |
| CIP-003-4 | R3.3. | security policy must be reviewed and approved annually by the senior manager or delegate(s) to ensure the exceptions are still required and valid. Such review and approval shall be documented. | N/A | N/A | N/A | Exceptions to the cyber security policy were not reviewed or were not approved on an annual basis by the senior manager or delegate(s) to ensure the exceptions are still required and valid or the review and approval is not documented. |
| CIP-003-4 | R4. | Information Protection — The Responsible Entity shall implement and document a program to identify, classify, and protect information associated with Critical Cyber Assets. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document a program to identify, classify, and protect information associated with Critical Cyber Assets. |
| CIP-003-4 | R4.1. | The Critical Cyber Asset information to be protected shall include, at a minimum and regardless of media type, operational procedures, lists as required in Standard CIP-002-4, network topology or similar diagrams, floor plans of computing centers that contain Critical Cyber Assets, equipment layouts of Critical Cyber Assets, disaster recovery plans, incident response plans, and security configuration information. | N/A | N/A | The information protection program does not include one of the minimum information types to be protected as detailed in R4.1. | The information protection program does not include two or more of the minimum information types to be protected as detailed in R4.1. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-003-4 | R4.2. | The Responsible Entity shall classify information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. | N/A | N/A | N/A | The Responsible Entity did not classify the information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. |
| CIP-003-4 | R4.3. | The Responsible Entity shall, at least annually, assess adherence to its Critical Cyber Asset information protection program, document the assessment results, and implement an action plan to remediate deficiencies identified during the assessment. | N/A | N/A | N/A | The Responsible Entity did not annually assess adherence to its Critical Cyber Asset information protection program, including documentation of the assessment results, OR The Responsible Entity did not implement an action plan to remediate deficiencies identified during the assessment. |
| CIP-003-4 | R5. | Access Control — The Responsible Entity shall document and implement a program for managing access to protected Critical Cyber Asset information. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document a program for managing access to protected Critical |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | Cyber Asset information. |
| CIP-003-4 | R5.1. | The Responsible Entity shall maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information. | N/A | N/A | The Responsible Entity maintained a list of designated personnel for authorizing either logical or physical access but not both. | The Responsible Entity did not maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information. |
| CIP-003-4 | R5.1.1. | Personnel shall be identified by name, title, and the information for which they are responsible for authorizing access. | N/A | N/A | The Responsible Entity did identify the personnel by name, title, and the information for which they are responsible for authorizing access, but the business phone is missing. | Personnel are not identified by name, title, or the information for which they are responsible for authorizing access. |
| CIP-003-4 | R5.1.2. | The list of personnel responsible for authorizing access to protected information shall be verified at least annually. | N/A | N/A | N/A | The Responsible Entity did not verify at least annually the list of personnel responsible for authorizing access to protected information. |
| CIP-003-4 | R5.2. | The Responsible Entity shall review at least annually the access privileges to protected information to confirm that access privileges are correct and that they | N/A | N/A | N/A | The Responsible Entity did not review at least annually the access privileges to protected |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|----------|--|
| | | correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities. | | | | information to confirm that access privileges are correct and that they correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities. |
| CIP-003-4 | R5.3. | The Responsible Entity shall assess and document at least annually the processes for controlling access privileges to protected information. | N/A | N/A | N/A | The Responsible Entity did not assess and document at least annually the processes for controlling access privileges to protected information. |
| CIP-003-4 | R6. | Change Control and Configuration Management — The Responsible Entity shall establish and document a process of change control and configuration management for adding, modifying, replacing, or removing Critical Cyber Asset hardware or software, and implement supporting configuration management activities to identify, control and document all entity or vendor related changes to hardware and software components of Critical Cyber Assets pursuant to the change control process. | N/A | N/A | N/A | The Responsible Entity has not established or documented a change control process for the activities required in R6, OR The Responsible Entity has not established or documented a configuration management process for the activities required in |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|--|--|--|---|
| CIP-004-4 | R1. | Awareness — The Responsible Entity shall establish, document, implement, and maintain a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security practices. The program shall include security awareness reinforcement on at least a quarterly basis using mechanisms such as: 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.). | N/AThe Responsible Entity established, implemented, and maintained but did not document a security awareness program to ensure personnel having authorized cyber or authorized gunescorted physical access to Critical Cyber Assets receive on going reinforcement in sound security practices. | <u>N/A</u> The Responsibility Entity did not provide security awareness reinforcement on at least a quarterly basis. | The ResponsibleEntity did documentbut did notestablish,implement, normaintain a securityawareness programto ensure personnelhaving authorizedcyber or authorizedunescorted physicalaccess to CriticalCyber Assets receiveon goingreinforcement insound securitypractices.The Responsible[1]Entity did notprovide securityawarenessreinforcement on atleast a quarterlybasis. | R6. The Responsible Entity did not establish, implement, maintain, nor document a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security practices. |
| CIP-004-4 | R2. | Training — The Responsible Entity shall establish, document, implement, and maintain an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. The | <u>N/A</u> The Responsible Entity established, implemented, and maintained but did not document an annual cyber security training | <u>N/A</u> The Responsibility Entity did not review the training program on an annual basis. | The Responsible Entity did document but did not establish, implement, nor maintain an annual cyber security | The Responsible Entity did not establish, implement, maintain, n or document an annual cyber security |

¹ Please note that FERC's January 20, 2011 Order on Version 2 And Version 3 Violation Risk Factors And Violation Severity Levels For Critical Infrastructure Protection Reliability Standards dictated "Responsible Entity" to be changed to "Responsibility Entity." NERC assumes FERC intended the VSL to read "Responsible Entity" and therefore is not making this change. NERC proposes to remove this footnote from the final approved list of VSLs.

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|--|--|---|---|
| | | cyber security training program shall be reviewed annually, at a minimum, and shall be updated whenever necessary. | program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. | | training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. The Responsible[²] Entity did not review the training program on an annual basis. | training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. |
| CIP-004-4 | R2.1. | This program will ensure that all personnel having such access to Critical Cyber Assets, including contractors and service vendors, are trained prior to their being granted such access except in specified circumstances such as an emergency. | <u>N/AAt least one</u> individual but less than 5% of personnel having authorized cyber or unescorted physical access to Critical Cyber Assets, including contractors and service vendors, were not trained prior to their being granted such access except in specified circumstances such as an emergency. | <u>N/AAt least 5% but</u> less than 10% of all personnel having authorized cyber or unescorted physical access to Critical Cyber Assets, including contractors and service vendors, were not trained prior to their being granted such access except in specified circumstances such as an emergency. | <u>N/AAt least 10% but</u> less than 15% of all personnel having authorized cyber or unescorted physical access to Critical Cyber Assets, including contractors and service vendors, were not trained prior to their being granted such access except in specified circumstances such as an emergency. | 15% or more of Not all personnel having authorized cyber or unescorted physical access to Critical Cyber Assets, including contractors and service vendors, were not trained prior to their being granted such access except in specified circumstances such as an emergency. |
| CIP-004-4 | R2.2. | Training shall cover the policies, access controls, and procedures as developed for the Critical Cyber Assets covered by CIP-004-4, and include, at a minimum, the following required items appropriate to | N/A | N/A | N/A | The training does not include one or more of the minimum topics as detailed in R2.2.1, R2.2.2, R2.2.3, |

² Please see previous footnote. NERC proposes to remove this footnote from the final approved list of VSLs.

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--|--|---|
| | | personnel roles and responsibilities: | | | | R2.2.4. |
| CIP-004-4 | R2.2.1. | The proper use of Critical Cyber Assets; | N/A | N/A | N/A | N/A |
| CIP-004-4 | R2.2.2. | Physical and electronic access controls to Critical Cyber Assets; | N/A | N/A | N/A | N/A |
| CIP-004-4 | R2.2.3. | The proper handling of Critical Cyber Asset information; and, | N/A | N/A | N/A | N/A |
| CIP-004-4 | R2.2.4. | Action plans and procedures to recover or re-establish Critical Cyber Assets and access thereto following a Cyber Security Incident. | N/A | N/A | N/A | N/A |
| CIP-004-4 | R2.3. | The Responsible Entity shall maintain documentation that training is conducted at least annually, including the date the training was completed and attendance records. | N/A | N/A | The Responsible Entity did maintain documentation that training is conducted at least annually, but did not include attendance records. | The Responsible Entity did not maintain documentation that training is conducted at least annually, including the date the training was completed and attendance records. |
| CIP-004-4 | R3. | Personnel Risk Assessment —The Responsible Entity shall have a documented personnel risk assessment program, in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements, for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. A personnel risk assessment shall be conducted pursuant to that program prior to such personnel being granted such | N/A | The Responsible Entity has a personnel risk assessment program, in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements, as stated in R3, for personnel having | The Responsible Entity has a personnel risk assessment program as stated in R3, but conducted the personnel risk assessment pursuant to that program after such personnel were granted such access except in specified circumstances such | The Responsible Entity does not have a documented personnel risk assessment program, in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements, as stated in R3, -for |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--|--|---|
| | | access except in specified circumstances such as an emergency. The personnel risk assessment program shall at a minimum include: | | authorized cyber or authorized unescorted physical access, but the program is not documented. | as an emergency. | personnel having authorized cyber or authorized unescorted physical access. OR The Responsible Entity did not conduct the personnel risk assessment pursuant to that program for personnel granted |
| | | | | | | such access except in specified circumstances such as an emergency. |
| CIP-004-4 | R3.1. | The Responsible Entity shall ensure that each assessment conducted include, at least, identity verification (e.g., Social Security Number verification in the U.S.) and seven year criminal check. The Responsible Entity may conduct more detailed reviews, as permitted by law and subject to existing collective bargaining unit agreements, depending upon the criticality of the position. | N/A | N/A | The Responsible Entity did not ensure that an assessment conducted included an identity verification (e.g., Social Security Number verification in the U.S.) or a seven-year criminal check. | The Responsible Entity did not ensure that each assessment conducted include, at least, identity verification (e.g., Social Security Number verification in the U.S.) and seven-year criminal check. |
| CIP-004-4 | R3.2. | The Responsible Entity shall update each personnel risk assessment at least every seven years after the initial personnel risk assessment or | N/A | The Responsible Entity did not update each personnel risk | The Responsible Entity did not update each personnel risk | The Responsible Entity did not update each personnel risk |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | for cause. | | assessment at least every seven years after the initial personnel risk assessment but did update it for cause when applicable. | assessment for cause (when applicable) but did at least updated it every seven years after the initial personnel risk assessment. | assessment at least every seven years after the initial personnel risk assessment nor was it updated for cause when applicable. |
| CIP-004-4 | R3.3. | The Responsible Entity shall document the results of personnel risk assessments of its personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets, and that personnel risk assessments of contractor and service vendor personnel with such access are conducted pursuant to Standard CIP- 004-4. | The Responsible Entity did not document the results of personnel risk assessments for at least one individual but less than 5% of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | The Responsible Entity did not document the results of personnel risk assessments for 5% or more but less than 10% of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | The Responsible Entity did not document the results of personnel risk assessments for 10% or more but less than 15% of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. | The Responsible Entity did not document the results of personnel risk assessments for 15% or more of all personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, pursuant to Standard CIP-004. |
| CIP-004-4 | R4. | Access — The Responsible Entity shall maintain list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets. | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access | The Responsible Entity did not maintain complete list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|--|--|---|--|
| | | | rights to Critical Cyber Assets, missing at least one individual but less than 5% of the authorized personnel. | rights to Critical Cyber Assets, missing 5% or more but less than 10% of the authorized personnel. | rights to Critical Cyber Assets, missing 10% or more but less than 15%of the authorized personnel. | rights to Critical Cyber Assets, missing 15% or more of the authorized personnel. |
| CIP-004-4 | R4.1. | The Responsible Entity shall review the list(s) of its personnel who have such access to Critical Cyber Assets quarterly, and update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, or any change in the access rights of such personnel. The Responsible Entity shall ensure access list(s) for contractors and service vendors are properly maintained. | N/A | The Responsible Entity did not review the list(s) of its personnel who have access to Critical Cyber Assets quarterly. | The Responsible Entity did not update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, nor any change in the access rights of such personnel. | The Responsible Entity did not review the list(s) of all personnel who have access to Critical Cyber Assets quarterly, nor update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, nor any change in the access rights of such personnel. |
| CIP-004-4 | R4.2. | The Responsible Entity shall revoke such access to Critical Cyber Assets within 24 hours for personnel terminated for cause and within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. | N/A | The Responsible Entity did not revoke access within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. | The Responsible Entity did not revoke access to Critical Cyber Assets within 24 hours for personnel terminated for cause. | The Responsible Entity did not revoke access to Critical Cyber Assets within 24 hours for personnel terminated for cause nor within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-005-4 | R1. | Electronic Security Perimeter — The Responsible Entity shall ensure that every Critical Cyber Asset resides within an Electronic Security Perimeter. The Responsible Entity shall identify and document the Electronic Security Perimeter(s) and all access points to the perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not ensure that every Critical Cyber Asset resides within an Electronic Security Perimeter. OR The Responsible Entity did not identify and document the Electronic Security Perimeter(s) and all access points to the perimeter(s). |
| CIP-005-4 | R1.1. | Access points to the Electronic Security Perimeter(s) shall include any externally connected communication end point (for example, dial-up modems) terminating at any device within the Electronic Security Perimeter(s). | N/A | N/A | N/A | Access points to the Electronic Security Perimeter(s) do not include all externally connected communication end point (for example, dial-up modems) terminating at any device within the Electronic Security Perimeter(s). |
| CIP-005-4 | R1.2. | For a dial-up accessible Critical Cyber Asset that uses a non-routable protocol, the Responsible Entity shall define an Electronic Security Perimeter for that single access point at the dial-up device. | N/A | N/A | N/A | For one or more dial-up accessible Critical Cyber Assets that use a non- routable protocol, the Responsible Entity did not define an Electronic |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | Security Perimeter for that single access point at the dial-up device. |
| CIP-005-4 | R1.3. | Communication links connecting discrete Electronic Security Perimeters shall not be considered part of the Electronic Security Perimeter. However, end points of these communication links within the Electronic Security Perimeter(s) shall be considered access points to the Electronic Security Perimeter(s). | N/A | N/A | N/A | At least one end point of a communication link within the Electronic Security Perimeter(s) connecting discrete Electronic Security Perimeters was not considered an access point to the Electronic Security Perimeter. |
| CIP-005-4 | R1.4. | Any non-critical Cyber Asset within a defined Electronic Security Perimeter shall be identified and protected pursuant to the requirements of Standard CIP-005-4. | N/A | N/A | N/A | One or more noncritical Cyber Asset within a defined Electronic Security Perimeter is not identified. OR Is not protected pursuant to the requirements of Standard CIP-005. |
| CIP-005-4 | R1.5. | Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall be afforded the protective measures as a specified in Standard CIP-003-4; Standard CIP-004-4 Requirement R3; Standard CIP-005-4 Requirements R2 | <u>N/A</u> A Cyber Asset used in the access control and/or monitoring of the Electronic Security Perimeter(s) is provided with all but | <u>N/A</u> A Cyber Asset used in the access control and/or monitoring of the Electronic Security Perimeter(s) is provided with all but | <u>N/A</u> A Cyber Asset used in the access control and/or monitoring of the Electronic Security Perimeter(s) is provided with all but | A Cyber Asset used in the access control and/or monitoring of the Electronic Security Perimeter(s) <u>was not</u> <u>afforded is</u> |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | and R3; Standard CIP-006-4 Requirement R3; Standard CIP-007-4 Requirements R1 and R3 through R9; Standard CIP-008-4; and Standard CIP-009-4. | one (1) of the protective measures as specified in Standard CIP-003-3; Standard CIP-004-3 Requirement R3; Standard CIP- 005-3 Requirements R2 and R3; Standard CIP-006-3a Requirements R3, Standard CIP- 007-3 Requirements R1 and R3 through R9;, Standard CIP-008-3; and Standard CIP- 009-3. | two (2) of the protective measures as specified in Standard CIP-003-3; Standard CIP-004-3 Requirement R3;; Standard CIP- 005-3 Requirements R2 and R3; Standard CIP-006-3a Requirements R3; Standard CIP- 007-3 Requirements R1 and R3 through R9;; Standard CIP-008-3; and Standard CIP- 009-3. | three (3) of the protective measures as specified in Standard CIP-003-3; Standard CIP-004-3 Requirement R3; Standard CIP- 005-3 Requirements R2 and R3; Standard CIP-006-3a Requirements R3; Standard CIP- 007-3 Requirements R1 and R3 through R9; Standard CIP-008-3; and Standard CIP- 009-3. | not-provided without four (4) one [1] or more of the protective measures as_specified in Standard CIP-003- 43; Standard CIP- 004-43 Requirement R3; Standard CIP- 005-43 Requirements R2 and R3; Standard CIP-006-43Ca Requirements R3; Standard CIP-007-43 Requirements R1 and R3 through R9; Standard CIP-008- 43; and Standard CIP-009-43. |
| CIP-005-4 | R1.6. | The Responsible Entity shall maintain documentation of Electronic Security Perimeter(s), all interconnected Critical and non-critical Cyber Assets within the Electronic Security Perimeter(s), all electronic access points to the Electronic Security Perimeter(s) and the Cyber Assets deployed for the access control and monitoring of these access points. | N/A | N/A | N/A | The Responsible Entity did not maintain documentation of one or more of the following: Electronic Security Perimeter(s), interconnected Critical and noncritical Cyber Assets within the Electronic Security Perimeter(s), electronic access |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | points to the Electronic Security Perimeter(s) and Cyber Assets deployed for the access control and monitoring of these access points. |
| CIP-005-4 | R2. | Electronic Access Controls — The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not implement or did not document the organizational processes and technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s). |
| CIP-005-4 | R2.1. | These processes and mechanisms shall use an access control model that denies access by default, such that explicit access permissions must be specified. | N/A | N/A | N/A | The processes and mechanisms did not use an access control model that denies access by default, such that explicit access permissions must be specified. |
| CIP-005-4 | R2.2. | At all access points to the Electronic Security Perimeter(s), the Responsible Entity shall enable only ports and services | N/A | N/A | N/A | At one or more access points to the Electronic Security Perimeter(s), the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | required for operations and for monitoring Cyber Assets within the Electronic Security Perimeter, and shall document, individually or by specified grouping, the configuration of those ports and services. | | | | Responsible Entity enabled ports and services not required for operations and for monitoring Cyber Assets within the Electronic Security Perimeter, or did not document, individually or by specified grouping, the configuration of those ports and services. |
| CIP-005-4 | R2.3. | The Responsible Entity shall implement and maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s). | N/A | N/A | N/AThe Responsible Entity did implement but did not maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s) where applicable. | The Responsible Entity did not implement n or maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s) where applicable. |
| CIP-005-4 | R2.4. | Where external interactive access into the Electronic Security Perimeter has been enabled, the Responsible Entity shall implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible. | N/A | N/A | N/A | Where external interactive access into the Electronic Security Perimeter has been enabled the Responsible Entity did not implement strong procedural or technical controls at the access points to ensure authenticity |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | of the accessing party, where technically feasible. |
| CIP-005-4 | R2.5. | The required documentation shall, at least, identify and describe: | N/A | N/A | N/A | The required documentation for R2 did not include one or more of the elements described in R2.5.1 through R2.5.4. |
| CIP-005-4 | R2.5.1. | The processes for access request and authorization. | N/A | N/A | N/A | N/A |
| CIP-005-4 | R2.5.2. | The authentication methods. | N/A | N/A | N/A | N/A |
| CIP-005-4 | R2.5.3. | The review process for authorization rights, in accordance with Standard CIP-004-4 Requirement R4. | N/A | N/A | N/A | N/A |
| CIP-005-4 | R2.5.4. | The controls used to secure dial-up accessible connections. | N/A | N/A | N/A | N/A |
| CIP-005-4 | R2.6. | Appropriate Use Banner — Where technically feasible, electronic access control devices shall display an appropriate use banner on the user screen upon all interactive access attempts. The Responsible Entity shall maintain a document identifying the content of the banner. | The Responsible Entity did not maintain a document identifying the content of the banner. OR Where technically feasible less than 5% electronic access control devices did not display an appropriate use banner on the user screen upon all | Where technically feasible 5% but less than 10% of electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. | Where technically feasible 10% but less than 15% of electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. | Where technically feasible, 15% or more electronic access control devices did not display an appropriate use banner on the user screen upon all interactive access attempts. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | interactive access attempts. | | | |
| CIP-005-4 | R3. | Monitoring Electronic Access — The Responsible Entity shall implement and document an electronic or manual process(es) for monitoring and logging access at access points to the Electronic Security Perimeter(s) twenty-four hours a day, seven days a week. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document electronic or manual processes monitoring and logging access points. |
| CIP-005-4 | R3.1. | For dial-up accessible Critical Cyber Assets that use non-routable protocols, the Responsible Entity shall implement and document monitoring process(es) at each access point to the dial-up device, where technically feasible. | N/A | N/A | N/A | Where technically feasible, the Responsible Entity did not implement or did not document electronic or manual processes for monitoring at one or more access points to dial-up devices. |
| CIP-005-4 | R3.2. | Where technically feasible, the security monitoring process(es) shall detect and alert for attempts at or actual unauthorized accesses. These alerts shall provide for appropriate notification to designated response personnel. Where alerting is not technically feasible, the Responsible Entity shall review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. | N/A | N/A | N/A | Where technically feasible, the Responsible Entity did not implement security monitoring process(es) to detect and alert for attempts at or actual unauthorized accesses. OR The above alerts do not provide for appropriate |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | notification to designated response personnel. OR Where alerting is not technically feasible, the Responsible Entity did not review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. |
| CIP-005-4 | R4. | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of the electronic access points to the Electronic Security Perimeter(s) at least annually. The vulnerability assessment shall include, at a minimum, the following: | N/A | N/A | N/A | The Responsible Entity did not perform a Vulnerability Assessment at least annually for one or more of the access points to the Electronic Security Perimeter(s). OR The vulnerability assessment did not include one (1) or more of the subrequirements |
| CIP-005-4 | R4.1. | A document identifying the | N/A | N/A | N/A | R4.1, R4.2, R4.3, R4.4, R4.5. N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-005-4 | R4.2. | vulnerability assessment process; A review to verify that only ports and services required for operations at these access points are enabled; | N/A | N/A | N/A | N/A |
| CIP-005-4 | R4.3. | The discovery of all access points to the Electronic Security Perimeter; | N/A | N/A | N/A | N/A |
| CIP-005-4 | R4.4. | A review of controls for default accounts, passwords, and network management community strings; | N/A | N/A | N/A | N/A |
| CIP-005-4 | R4.5. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | N/A | N/A | N/A | N/A |
| CIP-005-4 | R5. | Documentation Review and Maintenance — The Responsible Entity shall review, update, and maintain all documentation to support compliance with the requirements of Standard CIP-005-4. | The Responsible Entity did not review, update, and maintain at least one but less than or equal to 5% of the documentation to support compliance with the requirements of Standard CIP-005. | The Responsible Entity did not review, update, and maintain greater than 5% but less than or equal to 10% of the documentation to support compliance with the requirements of Standard CIP-005. | The Responsible Entity did not review, update, and maintain greater than 10% but less than or equal to 15% of the documentation to support compliance with the requirements of Standard CIP-005. | The Responsible Entity did not review, update, and maintain greater than 15% of the documentation to support compliance with the requirements of Standard CIP-005. |
| CIP-005-4 | R5.1. | The Responsible Entity shall ensure that all documentation required by Standard CIP-005-4 reflect current configurations and processes and shall review the documents and procedures referenced in Standard CIP-005-4 at least annually. | N/A | The Responsible Entity did not provide evidence of an annual review of the documents and procedures referenced in Standard CIP-005. | The Responsible Entity did not document current configurations and processes referenced in Standard CIP-005. | The Responsible Entity did not document current configurations and processes and did not review the documents and procedures |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | referenced in Standard CIP-005 at least annually. |
| CIP-005-4 | R5.2. | The Responsible Entity shall update the documentation to reflect the modification of the network or controls within ninety calendar days of the change. | N/A | N/A | N/A | The Responsible Entity did not update documentation to reflect a modification of the network or controls within ninety calendar days of the change. |
| CIP-005-4 | R5.3. | The Responsible Entity shall retain electronic access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-4. | The Responsible Entity retained electronic access logs for 75 or more calendar days, but for less than 90 calendar days. | The Responsible Entity retained electronic access logs for 60 or more calendar days, but for less than 75 calendar days. | The Responsible Entity retained electronic access logs for 45 or more calendar days, but for less than 60 calendar days. | The Responsible Entity retained electronic access logs for less than 45 calendar days. |
| CIP-006-4c | R1. | Physical Security Plan — The Responsible Entity shall document, implement, and maintain a physical security plan, approved by the senior manager or delegate(s) that shall address, at a minimum, the following: | N/A | N/A | The Responsible Entity created a physical security plan but did not gain approval by a senior manager or delegate(s). OR The Responsible Entity created and implemented but did not maintain a physical security | The Responsible Entity did not document, implement, and maintain a physical security plan. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-006-4c | R1.1. | All Cyber Assets within an Electronic Security Perimeter shall reside within an identified Physical Security Perimeter. Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity shall deploy and document alternative measures to control physical access to such Cyber Assets. | N/A | N/AWhere a completely enclosed ("six-wall") border cannot be established, the Responsible Entity has deployed but not-documented alternative measures to control physical access to such Cyber Assets within the Electronic Security Perimeter. | plan. <u>N/A</u> Where a completely enclosed ("six wall") border cannot be established, the Responsible Entity has not deployed alternative measures to control physical access to such Cyber Assets within the Electronic Security Perimeter. | The Responsible Entity's physical security plan does not include processes to ensure and document that all Cyber Assets within an Electronic Security Perimeter also reside within an identified Physical Security Perimeter. OR Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity has not deployed and-or_documented alternative measures to control physical access to the Critical s such Cyber Assets within the Electronic Security Perimeter. |
| CIP-006-4c | R1.2. | Identification of all physical access points through each Physical Security Perimeter and measures to control entry at those access points. | N/A | <u>N/A</u> The Responsible Entity's physical security plan includes measures to control entry at access points but | <u>N/A</u> The Responsible Entity's physical security identifies all access points through each Physical Security | The Responsible Entity's physical security plan does not identify all access points through each |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | does not identify all access points through each Physical Security Perimeter. | Perimeter but does not identify measures to control entry at those access points. | Physical Security Perimeter nor <u>does</u> <u>not identify</u> measures to control entry at those access points. |
| CIP-006-4c | R1.3 | Processes, tools, and procedures to monitor physical access to the perimeter(s). | N/A | N/A | N/A | The Responsible Entity's physical security plan does not include processes, tools, and procedures to monitor physical access to the perimeter(s). |
| CIP-006-4c | R1.4 | Appropriate use of physical access controls as described in Requirement R4 including visitor pass management, response to loss, and prohibition of inappropriate use of physical access controls. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not address the appropriate use of physical access controls as described in Requirement R4. |
| CIP-006-4c | R1.5 | Review of access authorization requests and revocation of access authorization, in accordance with CIP-004-4 Requirement R4. | N/A | N/A | <u>N/A</u> The Responsible Entity's physical security plan does not address either the process for reviewing access authorization requests or the process for revocation of access authorization, in accordance with | The Responsible Entity's physical security plan does not address the process for reviewing of access authorization requests and or the process for revocation of access authorization, in accordance with |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-006-4c | R1.6 | A visitor control program for visitors (personnel without authorized unescorted access to a Physical Security Perimeter), containing at a minimum the following: | <u>N/A</u> The responsible Entity included a visitor control program in its physical security plan, but either did not log the visitor entrance or did not log the | The responsible Entity included a visitor control program in its physical security plan, but either did not log the visitor or did not log the escort.N/A | CIP-004-3 Requirement R4. N/AThe responsible Entity included a visitor control program in its physical security plan, but either did not log the visitor or did not log the escort. | CIP-004- <u>4</u> 3 Requirement R4. The Responsible Entity did not include or implement a visitor control program in its physical security plan <u>or it does not</u> <u>meet the</u> requirements of |
| CIP-006-4c | R1.6.1 | Logs (manual or automated) to | visitor exit from the Physical Security Perimeter. | N/A | N/A | <u>continuous escort.</u> |
| Cir-000-4c | N1.0.1 | document the entry and exit of visitors, including the date and time, to and from Physical Security Perimeters. | | | | |
| CIP-006-4c | R1.6.2 | Continuous escorted access of visitors within the Physical Security Perimeter | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> |
| CIP-006-4c | R1.7 | Update of the physical security plan within thirty calendar days of the completion of any physical security system redesign or reconfiguration, including, but not limited to, addition or removal of access points through the Physical Security Perimeter, physical access controls, monitoring controls, or logging controls. | N/A | N/A | <u>N/A</u> The Responsible Entity's physical security plan addresses a process for updating the physical security plan within thirty calendar days of the completion of any physical security system redesign or reconfiguration but the plan was not | The Responsible Entity's physical security plan does not address a process for updating the physical security plan within-thirty calendar days of the completion of a physical security system redesign or within thirty calendar days of the |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | updated within thirty calendar days of the completion of a physical security system redesign or reconfiguration. | completion of a reconfiguration.ORThe plan was not updated within thirty calendar days of the completion of a physical security system redesign or reconfiguration |
| CIP-006-4c | R1.8 | Annual review of the physical security plan. | N/A | N/A | N/A | The Responsible Entity's physical security plan does not address a process for ensuring that the physical security plan is reviewed at least annually. |
| CIP-006-4c | R2 | Protection of Physical Access Control Systems — Cyber Assets that authorize and/or log access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers, shall: | <u>N/A</u> A Cyber Asset that authorizes and/or logs access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers was provided with | <u>N/A</u> A Cyber Asset that authorizes and/or logs access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers was provided with | A <u>N/A</u> -Cyber Asset that authorizes and/or logs access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers was provided with | A Cyber Asset that authorizes and/or logs access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers, was not protected |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | all but one (1) of the | all but two (2) | all but three (3) | from unauthorized |
| | | | protective measures | of the protective | of the protective | physical access. |
| | | | specified in Standard | measures specified | measures specified | |
| | | | CIP-003-3; Standard | in Standard CIP-003- | in Standard CIP-003- | OR |
| | | | CIP 004 3 | 3; Standard CIP-004- | 3; Standard CIP-004- | |
| | | | Requirement R3; | 3 Requirement | 3 Requirement | A Cyber Asset that |
| | | | Standard CIP-005-3 | R3; Standard CIP- | R3; Standard CIP- | authorizes and/or |
| | | | Requirements R2 | 005-3 Requirements | 005-3 Requirements | logs access to the |
| | | | and R3; Standard | R2 and R3; Standard | R2 and R3; Standard | Physical Security |
| | | | CIP-006-3a | CIP-006-3a | CIP-006-3a | Perimeter(s), |
| | | | Requirements R4 | Requirements R4 | Requirements R4 | exclusive of |
| | | | and R5; Standard | and R5; Standard | and R5; Standard | hardware at the |
| | | | CIP-007-3; Standard | CIP-007-3; Standard | CIP-007-3; Standard | Physical Security |
| | | | CIP-008-3; and | CIP-008-3; and | CIP-008-3; and | Perimeter access |
| | | | Standard CIP 009 3. | Standard CIP-009- | Standard CIP-009- | point such as |
| | | | | 3. | 3. | electronic lock |
| | | | | | | control mechanisms |
| 1 | | | | | | and badge readers |
| | | | | | | was provided |
| | | | | | | without not |
| | | | | | | <u>afforded four (4) or more of the</u> |
| | | | | | | |
| | | | | | | protective measures |
| | | | | | | specified in Standard CIP-003-4 3 ; |
| | | | | | | Standard CIP-004- <u>4</u> -3, |
| l | | | | | | Requirement |
| | | | | | | Requirement R3; Standard CIP- |
| | | | | | | 005-4 3 |
| | | | | | | Requirements R2 |
| | | | | | | and R3; Standard |
| | | | | | | CIP-006-4c 3a |
| 1 | | | | | | Requirements R4 |
| | | | | | | and R5; Standard |
| | | | | | | CIP-007- <u>4</u> 3; |
| 1 | | | | | | Standard |
| | | | | | | CIP-008-43; and |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | Standard CIP-009- <u>4</u> 3. |
| CIP-006-4c | R2.1. | Be protected from unauthorized physical access. | N/A | N/A | N/A | N/A |
| CIP-006-4c | R2.2. | Be afforded the protective measures specified in Standard CIP-003-4; Standard CIP-004-4 Requirement R3; Standard CIP-005-4 Requirements R2 and R3; Standard CIP-006-4a Requirements R4 and R5; Standard CIP-007-4; Standard CIP-008-4; and Standard CIP-009-4. | N/A | N/A | N/A | N/A |
| CIP-006-4c | R3 | Protection of Electronic Access Control Systems — Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall reside within an identified Physical Security Perimeter. | N/A | N/A | N/A | A Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) did <u>does</u> not reside within an identified Physical Security Perimeter. |
| CIP-006-4c | R4 | Physical Access Controls — The Responsible Entity shall document and implement the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. The Responsible Entity shall implement one or more of the following physical access methods: Card Key: A means of electronic access where the access rights of the card holder are predefined in a | N/A | N/AThe Responsible Entity has implemented but not documented the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty- four hours a day, seven days a week using one or more of | N/AThe Responsible Entity has documented but not implemented the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty- four hours a day, seven days a week using one or more of | The Responsible Entity has not documented nor has not implemented the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty- four hours a day, seven days a week using one or more of |

| Standard Requirement Number Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | computer database. Access rights may differ from one perimeter to another. Special Locks: These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. Security Personnel: Personnel responsible for controlling physical access who may reside on-site or at a monitoring station. Other Authentication Devices: Biometric, keypad, token, or other equivalent devices that control physical access to the Critical Cyber Assets | | the followingphysical accessmethods:- Card Key: - Ameans of electronicaccess where theaccess rights of thecard holder arepredefined in acomputer database.Access rights maydiffer from oneperimeter toanother Special Locks:These include, butare not limited to,locks with"restricted key"systems, magneticlocks that can beoperated remotely,and "man-trap"systems SecurityPersonnel:Personnel:Personnelreside on site or at amonitoring station OtherAuthenticationDevices: Biometric,keypad, token, orother equivalent | the following physical access methods: • Card Key: A means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from one perimeter to another. • Special Locks: These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. • Security Personnel: Personnel responsible for controlling physical access who may reside on site or at a monitoring station. • Other Authentication Devices: Biometric, keypad, token, or other equivalent | the following physical access methods: • Card Key: A means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from one perimeter to another. • Special Locks: These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. • Security Personnel: Personnel responsible for controlling physical access who may reside on-site or at a monitoring station. • Other Authentication Devices: Biometric, keypad, token, or other equivalent |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | devices that control physical access to the Critical Cyber Assets. | devices that control physical access to the Critical Cyber Assets. | devices that control physical access to the Critical Cyber Assets. |
| CIP-006-4c | R5 | Monitoring Physical Access — The Responsible Entity shall document and implement the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. Unauthorized access attempts shall be reviewed immediately and handled in accordance with the procedures specified in Requirement CIP-008-4. One or more of the following monitoring methods shall be used: Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel responsible for response. Human Observation of Access Points: Monitoring of physical access points by authorized personnel as specified in Requirement R4. | N/A | N/A The Responsible Entity has implemented but not documented the technical and procedural controls for monitoring physical access at all access points access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week using one or more of the following monitoring methods: - Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel responsible for response. | N/AThe Responsible Entity has documented but not implemented the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) twenty- four hours a day, seven days a week using one or more of the following monitoring methods: Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel response. | The Responsible Entity has not documented nor has not implemented the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week using one or more of the following monitoring methods: • Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel responsible for |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | Human Observation of Access Points: Monitoring of physical access points by authorized personnel as specified in Requirement R4. | Human Observation of Access Points: Monitoring of physical access points by authorized personnel as specified in Requirement R4. | response. • Human Observation of Access Points: Monitoring of physical access points by authorized personnel as specified in Requirement R4. OR An unauthorized access attempt was not reviewed immediately and handled in accordance with CIP-008-43. |
| CIP-006-4c | R6 | Logging Physical Access — Logging shall record sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. The Responsible Entity shall implement and document the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: • Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and | The Responsible Entity has implemented but not documented the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: • Computerized | N/AThe Responsible Entity has implemented the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: • Computerized Logging: Electronic | N/AThe Responsible Entity has documented but not implemented the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: • Computerized | The Responsible Entity has not implemented nor has not documented the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: |

| Standard Requiremen Number Number | t Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | wonitoring method. Video Recording: Electronic capture of video images of sufficient quality to determine identity. Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4 | Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method, • Video Recording: Electronic capture of video images of sufficient quality to determine identity, or • Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4, and has provided logging that records sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. | logs-produced by the Responsible Entity's selected access control and monitoring method, • Video Recording: Electronic capture of video images of sufficient quality to determine identity, or • Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4, but has not provided logging that records sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. | Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method, • Video Recording: Electronic capture of video images of sufficient quality to determine identity, or • Manual Logging: A log book or sign in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4. | Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method, Video Recording: Electronic capture of video images of sufficient quality to determine identity, or Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4. <u>OR</u> <u>The Responsible Entity has not</u> <u>recorded sufficient</u> <u>information to</u> <u>uniquely identify</u> <u>individuals and the</u> <u>time of access</u> <u>twenty-four hours a</u> |

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| CIP-006-4c | R7 | Access Log Retention — The responsible entity shall retain physical access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-4. | <u>N/A</u> The Responsible Entity retained physical access logs for 75 or more calendar days, but for less than 90 calendar days. | <u>N/A</u> The Responsible Entity retained physical access logs for 60 or more calendar days, but for less than 75 calendar days. | <u>N/A</u> The Responsible Entity retained physical access logs for 45 or more calendar days, but for less than 60 calendar days. | day, seven days a week.The Responsible Entity retained physical access logs for less than 45 calendar days. The responsible entity did not retain physical access logs for at least ninety calendar days. |
| CIP-006-4c | R8 | Maintenance and Testing — The Responsible Entity shall implement a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly. The program must include, at a minimum, the following: | <u>N/A</u> The Responsible Entity has implemented a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly but the program does not include one of the Requirements R8.1, R8.2, and R8.3. | <u>N/A</u> The Responsible Entity has implemented a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly but the program does not include two of the Requirements R8.1, R8.2, and R8.3. | <u>N/A</u> The Responsible Entity has implemented a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly but the program does not include any of the Requirements R8.1, R8.2, and R8.3. | The Responsible Entity has not implemented a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly. <u>OR</u> <u>The implemented</u> program does not include one or more of the requirements; R8.1, R8.2, and R8.3. |
| CIP-006-4c | R8.1 | Testing and maintenance of all physical security mechanisms on a cycle no longer than three years. | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> |
| CIP-006-4c | R8.2 | Retention of testing and | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | maintenance records for the cycle determined by the Responsible Entity in Requirement R8.1. | | | | |
| CIP-006-4c | R8.3 | Retention of outage records regarding access controls, logging, and monitoring for a minimum of one calendar year. | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> | <u>N/A</u> |
| CIP-007-4 | R1. | Test Procedures — The Responsible Entity shall ensure that new Cyber Assets and significant changes to existing Cyber Assets within the Electronic Security Perimeter do not adversely affect existing cyber security controls. For purposes of Standard CIP-007-4, a significant change shall, at a minimum, include implementation of security patches, cumulative service packs, vendor releases, and version upgrades of operating systems, applications, database platforms, or other third- party software or firmware. | N/A | N/A | N/A | The Responsible Entity did not ensure the prevention of adverse affects described in R1, by not including the required minimum significant changes. OR The Responsible Entity did not address one or more of the following: R1.1, R1.2, R1.3. |
| CIP-007-4 | R1.1. | The Responsible Entity shall create, implement, and maintain cyber security test procedures in a manner that minimizes adverse effects on the production system or its operation. | N/A | N/A | N/A | N/A |
| CIP-007-4 | R1.2. | The Responsible Entity shall document that testing is performed in a manner that reflects the production environment. | N/A | N/A | N/A | N/A |
| CIP-007-4 | R1.3. | The Responsible Entity shall document test results. | N/A | N/A | N/A | N/A |
| CIP-007-4 | R2. | Ports and Services — The Responsible Entity shall establish, | N/A | <u>N/A</u> The Responsible | <u>N/A</u> The Responsible | The Responsible |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | document and implement a process to ensure that only those ports and services required for normal and emergency operations are enabled. | | Entity established (implemented) but did not document a process to ensure that only those ports and services required for normal and emergency operations are enabled. | Entity documented but did not establish (implement) a process to ensure that only those ports and services required for normal and emergency operations are enabled. | Entity did not establish (implement) n or <u>did</u> <u>not</u> document a process to ensure that only those ports and services required for normal and emergency operations are enabled. |
| CIP-007-4 | R2.1. | The Responsible Entity shall enable only those ports and services required for normal and emergency operations. | N/A | N/A | N/A | The Responsible Entity enabled one or more ports or services not required for normal and emergency operations on Cyber Assets inside the Electronic Security Perimeter(s). |
| CIP-007-4 | R2.2. | The Responsible Entity shall disable other ports and services, including those used for testing purposes, prior to production use of all Cyber Assets inside the Electronic Security Perimeter(s). | N/A | N/A | N/A | The Responsible Entity did not disable one or more other ports or services, including those used for testing purposes, prior to production use for Cyber Assets inside the Electronic Security Perimeter(s). |
| CIP-007-4 | R2.3. | In the case where unused ports and services cannot be disabled due to technical | N/A | N/A | N/A | For cases where unused ports and services cannot be |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | limitations, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | | | | disabled due to technical limitations, the Responsible Entity did not document compensating measure(s) applied to mitigate risk <u>.</u> exposure or state an acceptance of risk. |
| CIP-007-4 | R3. | Security Patch Management — The Responsible Entity, either separately or as a component of the documented configuration management process specified in CIP-003-4 Requirement R6, shall establish, document and implement a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | N/AThe Responsible Entity established (implemented) and documented, either separately or as a component of the documented configuration management process specified in CIP-003-3 Requirement R6, a security patch management program but did not include one or more of the following: tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | N/AThe Responsible Entity established (implemented) but did not document, either separately or as a component of the documented configuration management process specified in CIP-003-3 Requirement R6, a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | N/AThe Responsible Entity documented but did not establish (implement), either separately or as a component of the documented configuration management process specified in CIP-003-3 Requirement R6, a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | The Responsible Entity did not establish (implement) nor did not document, either separately or as a component of the documented configuration management process specified in CIP-003- <u>43</u> Requirement R6, a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-007-4 | R3.1. | The Responsible Entity shall document the assessment of security patches and security upgrades for applicability within thirty calendar days of availability of the patches or upgrades. | N/A | N/A | N/A | The Responsible Entity did not document the assessment of security patches and security upgrades for applicability as required in Requirement R3 within 30 calendar days after the availability of the patches and upgrades. |
| CIP-007-4 | R3.2. | The Responsible Entity shall document the implementation of security patches. In any case where the patch is not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | N/A | N/A | N/A | The Responsible Entity did not document the implementation of applicable security patches as required in R3. OR Where an applicable patch was not installed, the Responsible Entity did not document the compensating measure(s) applied to mitigate risk. exposure or an acceptance of risk. |
| CIP-007-4 | R4. | Malicious Software Prevention — The Responsible Entity shall use anti- virus software and other malicious software ("malware") prevention | N/A | N/A | N/A | The Responsible Entity, where technically feasible, |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | tools, where technically feasible, to detect, prevent, deter, and mitigate the introduction, exposure, and propagation of malware on all Cyber Assets within the Electronic Security Perimeter(s). | | | | did not use anti- virus software or other malicious software ("malware") prevention tools, on <u>one</u> or more Cyber Assets within the Electronic Security Perimeter(s). |
| CIP-007-4 | R4.1. | The Responsible Entity shall document and implement anti-virus and malware prevention tools. In the case where anti-virus software and malware prevention tools are not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | N/A | N/A | N/A | The Responsible Entity did not document the implementation of antivirus and malware prevention tools for cyber assets within the electronic security perimeter. |
| | | | | | | OR The Responsible Entity did not document the implementation of compensating measure(s) applied to mitigate risk exposure where antivirus and malware prevention tools are not installed. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-007-4 | R4.2. | The Responsible Entity shall document and implement a process for the update of anti-virus and malware prevention "signatures." The process must address testing and installing the signatures. | N/A | N/A | N/A | The Responsible Entity did not document or did not implement a process including addressing testing and installing the signatures for the update of anti-virus and malware prevention "signatures." |
| CIP-007-4 | R5. | Account Management — The Responsible Entity shall establish, implement, and document technical and procedural controls that enforce access authentication of, and accountability for, all user activity, and that minimize the risk of unauthorized system access. | N/A | N/A | N/A | The Responsible Entity did not document or did not implement technical and procedural controls that enforce access authentication of, and accountability for, all user activity. |
| CIP-007-4 | R5.1. | The Responsible Entity shall ensure that individual and shared system accounts and authorized access permissions are consistent with the concept of "need to know" with respect to work functions performed. | N/A | N/A | N/A | The Responsible Entity did not ensure that individual and shared system accounts and authorized access permissions are consistent with the concept of "need to know" with respect to work functions performed. |
| CIP-007-4 | R5.1.1. | The Responsible Entity shall ensure that user accounts are implemented | N/A | N/A | N/A | One or more user |

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| | | | as approved by designated personnel. Refer to Standard CIP- 003-4 Requirement R5. | | | | accounts implemented by the Responsible Entity were not implemented as approved by designated personnel. |
| CI | P-007-4 | R5.1.2. | The Responsible Entity shall establish methods, processes, and procedures that generate logs of sufficient detail to create historical audit trails of individual user account access activity for a minimum of ninety days. | N/A | The Responsible Entity generated logs with sufficient detail to create historical audit trails of individual user account access activity, however the logs do not contain activity for a minimum of 90 days. | The Responsible Entity generated logs with insufficient detail to create historical audit trails of individual user account access activity. | The Responsible Entity did not generate logs of individual user account access activity. |
| С і | IP-007-4 | R5.1.3. | The Responsible Entity shall review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003-4 Requirement R5 and Standard CIP- 004-4 Requirement R4. | N/A | N/A | N/A | The Responsible Entity did not review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003- <u>43</u> Requirement R5 and Standard CIP-004- <u>34</u> Requirement R4. |
| CI | P-007-4 | R5.2. | The Responsible Entity shall implement a policy to minimize and manage the scope and acceptable use of administrator, shared, and | N/A | N/A | N/A | The Responsible Entity did not implement a policy to minimize and |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | other generic account privileges including factory default accounts. | | | | manage the scope and acceptable use of administrator, shared, and other generic account privileges including factory default accounts. |
| CIP-007-4 | R5.2.1. | The policy shall include the removal, disabling, or renaming of such accounts where possible. For such accounts that must remain enabled, passwords shall be changed prior to putting any system into service. | N/A | N/A | The Responsible Entity's policy did not include the removal, disabling, or renaming of such accounts where possible, however for accounts that must remain enabled, passwords were changed prior to putting any system into service. | For accounts that must remain enabled, the Responsible Entity did not change passwords prior to putting any system into service. |
| CIP-007-4 | R5.2.2. | The Responsible Entity shall identify those individuals with access to shared accounts. | N/A | N/A | N/A | The Responsible Entity did not identify all individuals with access to shared accounts. |
| CIP-007-4 | R5.2.3. | Where such accounts must be shared, the Responsible Entity shall have a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps for securing the account in the event of personnel changes (for example, | N/A | N/A | N/A | Where such accounts must be shared, the Responsible Entity has not implemented (one or more components of) a policy for managing |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | change in assignment or termination). | | | | the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps for securing the account in the event of personnel changes (for example, change in assignment or termination). |
| CIP-007-4 | R5.3. | At a minimum, the Responsible Entity shall require and use passwords, subject to the following, as technically feasible: | N/A | N/A | N/A | The Responsible Entity does not require passwords subject to R5.3.1, R5.3.2, R5.3.3. OR Does not use passwords subject to R5.3.1, R5.3.2, R5.3.3. |
| CIP-007-4 | R5.3.1. | Each password shall be a minimum of six characters. | N/A | N/A | N/A | N/A |
| CIP-007-4 | R5.3.2. | Each password shall consist of a combination of alpha, numeric, and "special" characters. | N/A | N/A | N/A | N/A |
| CIP-007-4 | R5.3.3. | Each password shall be changed at least annually, or more frequently based on risk. | N/A | N/A | N/A | N/A |
| CIP-007-4 | R6. | Security Status Monitoring — The Responsible Entity shall ensure that | N/A | N/A | N/A | The Responsible Entity as technically |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | all Cyber Assets within the Electronic Security Perimeter, as technically feasible, implement automated tools or organizational process controls to monitor system events that are related to cyber security. | | | | feasible, did not implement automated tools or organizational process controls, to monitor system events that are related to cyber security on one or more of Cyber Assets inside the Electronic Security Perimeter(s). |
| CIP-007-4 | R6.1. | The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter. | N/A | N/A | N/A | The Responsible Entity did not implement or did not document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter. |
| CIP-007-4 | R6.2. | The security monitoring controls shall issue automated or manual alerts for detected Cyber Security Incidents. | N/A | N/A | N/A | The Responsible entity's security monitoring controls do not issue automated or manual alerts for detected Cyber Security Incidents. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-007-4 | R6.3. | The Responsible Entity shall maintain logs of system events related to cyber security, where technically feasible, to support incident response as required in Standard CIP-008-4. | N/A | N/A | N/A | The Responsible Entity did not maintain logs of system events related to cyber security, where technically feasible, to support incident response as required in Standard CIP-008. |
| CIP-007-4 | R6.4. | The Responsible Entity shall retain all logs specified in Requirement R6 for ninety calendar days. | N/A | N/A | N/A | The Responsible Entity did not retain one or more of the logs specified in Requirement R6 for at least 90 calendar days. |
| CIP-007-4 | R6.5. | The Responsible Entity shall review logs of system events related to cyber security and maintain records documenting review of logs. | N/A | N/A | N/A | The Responsible Entity did not review logs of system events related to cyber security nor maintain records documenting review of logs. |
| CIP-007-4 | R7. | Disposal or Redeployment — The Responsible Entity shall establish and implement formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-4. | <u>N/A</u> The Responsible Entity established and implemented formal methods, processes, and procedures for disposal and redeployment of Cyber Assets within the Electronic | <u>N/A</u> The Responsible Entity established and implemented formal methods, processes, and procedures for disposal of Cyber Assets within the Electronic Security | The Responsible Entity established and implemented formal methods, processes, and procedures for redeployment of Cyber Assets within the Electronic Security | The Responsible Entity did not establish or implement formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | Number | | Security Perimeter(s) as identified and documented in Standard CIP- 005-3 but did not maintain records as specified in R7.3. | Perimeter(s) as identified and documented in Standard CIP-0053 but did not address redeployment as specified in R7.2. | Perimeter(s) as identified and documented in Standard CIP-005- <u>4</u> 3 but did not address disposal <u>redeployment</u> as specified in R7. <u>2</u> 1 . | Security Perimeter(s) as identified and documented in Standard CIP-005- <u>4</u> -3. OR The Responsible Entity established formal methods, processes, and procedures for redeployment of |
| | | | | | | Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-4 but did not address disposal as specified in R7.1. OR The Responsible Entity did not maintain records pertaining to disposal or[³] |

³ Please note that FERC's January 20, 2011 Order on Version 2 And Version 3 Violation Risk Factors And Violation Severity Levels For Critical Infrastructure Protection Reliability Standards dictated that this should read "…records pertaining to disposal **of** redeployment as specified in R7.3." (Emphasis added) It has come to NERC's attention that it should read "…records pertaining to disposal **or** redeployment as specified in R7.3." (Emphasis added) and NERC has made this change accordingly. NERC proposes to remove this footnote from the final approved list of VSLs.

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|----------|--|
| | | | | | | redeployment as specified in R7.3. |
| CIP-007-4 | R7.1. | Prior to the disposal of such assets, the Responsible Entity shall destroy or erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | N/A | N/A | N/A | N/A |
| CIP-007-4 | R7.2. | Prior to redeployment of such assets, the Responsible Entity shall, at a minimum, erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | N/A | N/A | N/A | N/A |
| CIP-007-4 | R7.3. | The Responsible Entity shall maintain records that such assets were disposed of or redeployed in accordance with documented procedures. | N/A | N/A | N/A | N/A |
| CIP-007-4 | R8 | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of all Cyber Assets within the Electronic Security Perimeter at least annually. The vulnerability assessment shall include, at a minimum, the following: | N/A | N/A | N/A | The Responsible Entity did not perform a Vulnerability Assessment on one or more Cyber Assets within the Electronic Security Perimeter at least annually. OR The vulnerability assessment did not include one (1) or more of the subrequirements 8.1, 8.2, 8.3, 8.4. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|---|-----------|--|--|--|
| CIP-007-4 | R8.1. | A document identifying the vulnerability assessment process; | N/A | N/A | N/A | N/A |
| CIP-007-4 | R8.2. | A review to verify that only ports and services required for operation of the Cyber Assets within the Electronic Security Perimeter are enabled; | N/A | N/A | N/A | N/A |
| CIP-007-4 | R8.3. | A review of controls for default accounts; and, | N/A | N/A | N/A | N/A |
| CIP-007-4 | R8.4. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | N/A | N/A | N/A | N/A |
| CIP-007-4 | R9 | Documentation Review and Maintenance — The Responsible Entity shall review and update the documentation specified in Standard CIP-007-4 at least annually. Changes resulting from modifications to the systems or controls shall be documented within thirty calendar days of the change being completed. | N/A | N/A | The Responsible Entity did not review and update the documentation specified in Standard CIP-007- <u>4</u> 3 at least annually. OR The Responsible Entity did not document changes resulting from modifications to the systems or controls within thirty calendar days of the change being completed. | The Responsible Entity did not review and update the documentation specified in Standard CIP-007- <u>43</u> at least annually nor and_were -changes resulting from modifications to the systems or controls <u>were not</u> documented within thirty calendar days of the change being completed. |
| CIP-008-4 | R1. | Cyber Security Incident Response Plan — The Responsible Entity shall | N/A | <u>N/A</u> The Responsible Entity has developed | The Responsible Entity has developed | The Responsible Entity has not |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | develop and maintain a Cyber Security Incident response plan and implement the plan in response to Cyber Security Incidents. The Cyber Security Incident response plan shall address, at a minimum, the following: | | but not maintained a Cyber Security Incident response plan. | a Cyber Security Incident response plan but the planthat addresses all of the components required by R1.1 through R1.6 but has not maintained the plan in accordance with those components. does not address one or more of the subrequirements R1.1 through R1.6. | developed a Cyber Security Incident response plan <u>that</u> addresses all of the <u>components</u> <u>required by R1.1</u> <u>through R1.6</u> , or has not implemented the plan in response to a Cyber Security Incident. |
| CIP-008-4 | R1.1. | Procedures to characterize and classify events as reportable Cyber Security Incidents. | N/A | N/A | N/A | N/A |
| CIP-008-4 | R1.2. | Response actions, including roles and responsibilities of Cyber Security Incident response teams, Cyber Security Incident handling procedures, and communication plans. | N/A | N/A | N/A | N/A |
| CIP-008-4 | R1.3. | Process for reporting Cyber Security Incidents to the Electricity Sector Information Sharing and Analysis Center (ES-ISAC). The Responsible Entity must ensure that all reportable Cyber Security Incidents are reported to the ES-ISAC either directly or through an intermediary. | N/A | N/A | N/A | N/A |
| CIP-008-4 | R1.4. | Process for updating the Cyber Security Incident response plan within thirty calendar days of any | N/A | N/A | N/A | N/A |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
|--------------------|-----------------------|--|-----------|--------------|----------|---|
| CIP-008-4 | R1.5. | changes. Process for ensuring that the Cyber Security Incident response plan is reviewed at least annually. | N/A | N/A | N/A | N/A |
| CIP-008-4 | R1.6. | Process for ensuring the Cyber Security Incident response plan is tested at least annually. A test of the Cyber Security Incident response plan can range from a paper drill, to a full operational exercise, to the response to an actual incident. | N/A | N/A | N/A | N/A |
| CIP-008-4 | R2 | Cyber Security Incident Documentation — The Responsible Entity shall keep relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 for three calendar years. | N/A | N/A | N/A | The Responsible Entity has not kept relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 for at least three calendar years. |
| CIP-009-4 | R1 | Recovery Plans — The Responsible Entity shall create and annually review recovery plan(s) for Critical Cyber Assets. The recovery plan(s) shall address at a minimum the following: | N/A | N/A | N/A | The Responsible Entity has not created or has not annually reviewed their recovery plan(s) for Critical Cyber Assets OR has created a plan but did not address one or more of the requirements CIP- 009- <u>43</u> R1.1 and R1.2. |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| CIP-009-4 | R1.1. | Specify the required actions in response to events or conditions of varying duration and severity that would activate the recovery plan(s). | N/A | N/A | N/A | N/A |
| CIP-009-4 | R1.2. | Define the roles and responsibilities of responders. | N/A | N/A | N/A | N/A |
| CIP-009-4 | R2 | Exercises — The recovery plan(s) shall be exercised at least annually. An exercise of the recovery plan(s) can range from a paper drill, to a full operational exercise, to recovery from an actual incident. | N/A | N/A | N/A | The Responsible Entity's recovery plan(s) have not been exercised at least annually. |
| CIP-009-4 | R3 | Change Control — Recovery plan(s) shall be updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. Updates shall be communicated to personnel responsible for the activation and implementation of the recovery plan(s) within thirty calendar days of the change being completed. | <u>N/AThe Responsible</u> Entity's recovery plan(s) have been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident but the updates were communicated to personnel responsible for the activation and implementation of the recovery plan(s) in more than30 but less than or equal to 120 calendar days of the change. | <u>N/A</u> The Responsible Entity's recovery plan(s) have been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident but the updates were communicated to personnel responsible for the activation and implementation of the recovery plan(s) in more than 120 but less than or equal to 150 calendar days of the change. | <u>N/A</u> The Responsible Entity's recovery plan(s) have been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident but the updates were communicated to personnel responsible for the activation and implementation of the recovery plan(s) in more than 150 but less than or equal to 180 calendar days of the change. | The Responsible Entity's recovery plan(s) have not been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. OR The Responsible Entity's recovery plan(s) have been updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident but the updates |

| Standard Number | Requirement Number | Text of Requirement | Lower VSL | Moderate VSL | High VSL | Severe VSL |
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| | | | | | | were <u>not</u> communicated to personnel responsible for the activation and implementation of the recovery plan(s) <u>within thirty more</u> than 180 calendar days of the change. |
| CIP-009-4 | R4 | Backup and Restore — The recovery plan(s) shall include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. For example, backups may include spare electronic components or equipment, written documentation of configuration settings, tape backup, etc. | N/A | N/A | N/A | The Responsible Entity's recovery plan(s) do not include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. |
| CIP-009-4 | R5 | Testing Backup Media — Information essential to recovery that is stored on backup media shall be tested at least annually to ensure that the information is available. Testing can be completed off site. | N/A | N/A | N/A | The Responsible Entity's information essential to recovery that is stored on backup media has not been tested at least annually to ensure that the information is available. |

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| CIP-002-4 | R1. | Critical Asset Identification — The Responsible Entity shall develop a list of its identified Critical Assets determined through an annual application of the criteria contained in <i>CIP-002-4 Attachment 1 – Critical Asset Criteria</i> . The Responsible Entity shall update this list as necessary, and review it at least annually. | HIGH |
| CIP-002-4 | R2. | Critical Cyber Asset Identification — Using the list of Critical Assets developed pursuant to Requirement R1, the Responsible Entity shall develop a list of associated Critical Cyber Assets essential to the operation of the Critical Asset. The Responsible Entity shall update this list as necessary, and review it at least annually. For each group of generating units (including nuclear generation) at a single plant location identified in Attachment 1, criterion 1.1, the only Cyber Assets that must be considered are those shared Cyber Assets that could, within 15 minutes, adversely impact the reliable operation of any combination of units that in aggregate equal or exceed Attachment 1, criterion For the purpose of Standard CIP 002-4, Critical Cyber Assets are further qualified to be those having at least one of the following characteristics: The Cyber Asset uses a routable protocol to communicate outside the Electronic Security Perimeter; or, The Cyber Asset uses a routable protocol within a control center; or, The Cyber Asset is dial-up accessible. | HIGH |
| CIP-002-4 | R3. | Annual Approval —The senior manager or delegate(s) shall approve annually the list of Critical Assets and the list of Critical Cyber Assets. Based on Requirements R1 and R2 the Responsible Entity may determine that it has no Critical Assets or Critical Cyber Assets. The Responsible Entity shall keep a signed and dated record of the senior manager or delegate(s)'s | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| | | approval of the list of Critical Assets and the list of Critical Cyber Assets (even if such lists are null.) | |
| CIP-003-4 | R1. | Cyber Security Policy — The Responsible Entity shall document and implement a cyber security policy that represents management's commitment and ability to secure its Critical | MEDIUM |
| | | Cyber Assets. The Responsible Entity shall, at minimum, ensure the following: | |
| CIP-003-4 | R1.1. | The cyber security policy addresses the requirements in Standards CIP-002-4 through CIP-009-4, including provision for emergency situations. | LOWER |
| CIP-003-4 | R1.2. | The cyber security policy is readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets. | LOWER |
| CIP-003-4 | R1.3 | Annual review and approval of the cyber security policy by the senior manager assigned pursuant to R2. | LOWER |
| CIP-003-4 | R2. | Leadership — The Responsible Entity shall assign a senior manager with overall responsibility for leading and managing the entity's implementation of, and adherence to, Standards CIP-002-4 through CIP-009-4. | LOWER <u>MEDIUM</u> |
| CIP-003-4 | R2.1. | The senior manager shall be identified by name, title, and date of designation. | LOWER |
| CIP-003-4 | R2.2. | Changes to the senior manager must be documented within thirty calendar days of the effective date. | LOWER |
| CIP-003-4 | R2.3. | Where allowed by Standards CIP-002-4 through CIP-009-4, the senior manager may delegate authority for specific actions to a named delegate or delegates. These delegations shall be documented in the same manner as R2.1 and R2.2, and approved by the senior manager. | LOWER |
| CIP-003-4 | R2.4 | The senior manager or delegate(s), shall authorize and document any exception from the requirements of the cyber security policy. | LOWER |
| CIP-003-4 | R3. | Exceptions — Instances where the Responsible Entity cannot conform to its cyber security policy must be documented as exceptions and authorized by the senior manager or delegate(s). | LOWER |
| CIP-003-4 | R3.1. | Exceptions to the Responsible Entity's cyber security policy must be documented within thirty days of being approved by the senior manager or delegate(s). | LOWER |
| CIP-003-4 | R3.2. | Documented exceptions to the cyber security policy must include an explanation as to why the exception is necessary and any compensating measures. | LOWER |
| CIP-003-4 | R3.3. | Authorized exceptions to the cyber security policy must be reviewed and approved annually by the senior manager or delegate(s) to ensure the exceptions are still required and valid. Such review and approval shall be documented. | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| CIP-003-4 | R4. | Information Protection — The Responsible Entity shall implement and document a program to identify, classify, and protect information associated with Critical Cyber Assets. | MEDIUM |
| CIP-003-4 | R4.1. | The Critical Cyber Asset information to be protected shall include, at a minimum and regardless of media type, operational procedures, lists as required in Standard CIP-002-4, network topology or similar diagrams, floor plans of computing centers that contain Critical Cyber Assets, equipment layouts of Critical Cyber Assets, disaster recovery plans, incident response plans, and security configuration information. | MEDIUM |
| CIP-003-4 | R4.2. | The Responsible Entity shall classify information to be protected under this program based on the sensitivity of the Critical Cyber Asset information. | LOWER |
| CIP-003-4 | R4.3. | The Responsible Entity shall, at least annually, assess adherence to its Critical Cyber Asset information protection program, document the assessment results, and implement an action plan to remediate deficiencies identified during the assessment. | LOWER |
| CIP-003-4 | R5. | Access Control — The Responsible Entity shall document and implement a program for managing access to protected Critical Cyber Asset information. | LOWER |
| CIP-003-4 | R5.1. | The Responsible Entity shall maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information. | LOWER |
| CIP-003-4 | R5.1.1. | Personnel shall be identified by name, title, and the information for which they are responsible for authorizing access. | LOWER |
| CIP-003-4 | R5.1.2. | The list of personnel responsible for authorizing access to protected information shall be verified at least annually. | LOWER |
| CIP-003-4 | R5.2. | The Responsible Entity shall review at least annually the access privileges to protected information to confirm that access privileges are correct and that they correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities. | LOWER |
| CIP-003-4 | R5.3. | The Responsible Entity shall assess and document at least annually the processes for controlling access privileges to protected information. | LOWER |
| CIP-003-4 | R6. | Change Control and Configuration Management — The Responsible Entity shall establish and document a process of change control and configuration management for adding, modifying, replacing, or removing Critical Cyber Asset hardware or software, and implement supporting configuration management activities to identify, control and document all entity or vendor related changes to hardware and software components of Critical Cyber Assets pursuant to the change control process. | LOWER |
| CIP-004-4 | R1. | Awareness — The Responsible Entity shall establish, document, implement, and maintain a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security practices. The program shall include security awareness reinforcement on at least a quarterly basis using mechanisms such as: | LOWER |

| Standard Requirement Number Number | | Text of Requirement | VRF |
|---------------------------------------|---------|---|--------|
| | | 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.). | |
| CIP-004-4 | R2. | Training — The Responsible Entity shall establish, document, implement, and maintain an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. The cyber security training program shall be reviewed annually, at a minimum, and shall be updated whenever necessary. | LOWER |
| CIP-004-4 | R2.1. | This program will ensure that all personnel having such access to Critical Cyber Assets, including contractors and service vendors, are trained prior to their being granted such access except in specified circumstances such as an emergency. | MEDIUM |
| CIP-004-4 | R2.2. | Training shall cover the policies, access controls, and procedures as developed for the Critical Cyber Assets covered by CIP-004-4, and include, at a minimum, the following required items appropriate to personnel roles and responsibilities: | MEDIUM |
| CIP-004-4 | R2.2.1. | The proper use of Critical Cyber Assets; | LOWER |
| CIP-004-4 | R2.2.2. | Physical and electronic access controls to Critical Cyber Assets; | LOWER |
| CIP-004-4 | R2.2.3. | The proper handling of Critical Cyber Asset information; and, | LOWER |
| CIP-004-4 | R2.2.4. | Action plans and procedures to recover or re-establish Critical Cyber Assets and access thereto following a Cyber Security Incident. | MEDIUM |
| CIP-004-4 | R2.3. | The Responsible Entity shall maintain documentation that training is conducted at least annually, including the date the training was completed and attendance records. | LOWER |
| CIP-004-4 | R3. | Personnel Risk Assessment — The Responsible Entity shall have a documented personnel risk assessment program, in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements, for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. A personnel risk assessment shall be conducted pursuant to that program prior to such personnel being granted such access except in specified circumstances such as an emergency. The personnel risk assessment program shall at a minimum include: | MEDIUM |
| CIP-004-4 | R3.1. | The Responsible Entity shall ensure that each assessment conducted include, at least, identity verification (e.g., Social Security Number verification in the U.S.) and seven year criminal check. The Responsible Entity may conduct more detailed reviews, as permitted by law and subject to existing collective bargaining unit agreements, depending upon the criticality of the position. | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| CIP-004-4 | R3.2. | The Responsible Entity shall update each personnel risk assessment at least every seven years after the initial personnel risk assessment or for cause. | LOWER |
| CIP-004-4 | R3.3. | The Responsible Entity shall document the results of personnel risk assessments of its personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets, and that personnel risk assessments of contractor and service vendor personnel with such access are conducted pursuant to Standard CIP-004-4. | LOWER |
| CIP-004-4 | R4. | Access — The Responsible Entity shall maintain list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets. | LOWER |
| CIP-004-4 | R4.1. | The Responsible Entity shall review the list(s) of its personnel who have such access to Critical Cyber Assets quarterly, and update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, or any change in the access rights of such personnel. The Responsible Entity shall ensure access list(s) for contractors and service vendors are properly maintained. | LOWER |
| CIP-004-4 | R4.2. | The Responsible Entity shall revoke such access to Critical Cyber Assets within 24 hours for personnel terminated for cause and within seven calendar days for personnel who no longer require such access to Critical Cyber Assets. | LOWER |
| CIP-005-4 | R1. | Electronic Security Perimeter — The Responsible Entity shall ensure that every Critical Cyber Asset resides within an Electronic Security Perimeter. The Responsible Entity shall identify and document the Electronic Security Perimeter(s) and all access points to the perimeter(s). | MEDIUM |
| CIP-005-4 | R1.1. | Access points to the Electronic Security Perimeter(s) shall include any externally connected communication end point (for example, dial-up modems) terminating at any device within the Electronic Security Perimeter(s). | MEDIUM |
| CIP-005-4 | R1.2. | For a dial-up accessible Critical Cyber Asset that uses a non-routable protocol, the Responsible Entity shall define an Electronic Security Perimeter for that single access point at the dial-up device. | MEDIUM |
| CIP-005-4 | R1.3. | Communication links connecting discrete Electronic Security Perimeters shall not be considered part of the Electronic Security Perimeter. However, end points of these communication links within the Electronic Security Perimeter(s) shall be considered access points to the Electronic Security Perimeter(s). | MEDIUM |
| CIP-005-4 | R1.4. | Any non-critical Cyber Asset within a defined Electronic Security Perimeter shall be identified and protected pursuant to the requirements of Standard CIP-005-4. | MEDIUM |
| CIP-005-4 | R1.5. | Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall be afforded the protective measures as a specified in Standard CIP- 003-4; Standard CIP-004-4 Requirement R3; Standard CIP-005-4 Requirements R2 and R3; Standard CIP-006-4 Requirement R3; Standard CIP-007-4 Requirements R1 and R3 | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| | | through R9; Standard CIP-008-4; and Standard CIP-009-4. | |
| CIP-005-4 | R1.6. | The Responsible Entity shall maintain documentation of Electronic Security Perimeter(s), all interconnected Critical and non-critical Cyber Assets within the Electronic Security Perimeter(s), all electronic access points to the Electronic Security Perimeter(s) and the Cyber Assets deployed for the access control and monitoring of these access points. | LOWER |
| CIP-005-4 | R2. | Electronic Access Controls — The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s). | MEDIUM |
| CIP-005-4 | R2.1. | These processes and mechanisms shall use an access control model that denies access by default, such that explicit access permissions must be specified. | MEDIUM |
| CIP-005-4 | R2.2. | At all access points to the Electronic Security Perimeter(s), the Responsible Entity shall enable only ports and services required for operations and for monitoring Cyber Assets within the Electronic Security Perimeter, and shall document, individually or by specified grouping, the configuration of those ports and services. | MEDIUM |
| CIP-005-4 | R2.3. | The Responsible Entity shall implement and maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s). | MEDIUM |
| CIP-005-4 | R2.4. | Where external interactive access into the Electronic Security Perimeter has been enabled, the Responsible Entity shall implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible. | MEDIUM |
| CIP-005-4 | R2.5. | The required documentation shall, at least, identify and describe: | LOWER |
| CIP-005-4 | R2.5.1. | The processes for access request and authorization. | LOWER |
| CIP-005-4 | R2.5.2. | The authentication methods. | LOWER |
| CIP-005-4 | R2.5.3. | The review process for authorization rights, in accordance with Standard CIP-004-4 Requirement R4. | LOWER |
| CIP-005-4 | R2.5.4. | The controls used to secure dial-up accessible connections. | LOWER |
| CIP-005-4 | R2.6. | Appropriate Use Banner — Where technically feasible, electronic access control devices shall display an appropriate use banner on the user screen upon all interactive access attempts. The Responsible Entity shall maintain a document identifying the content of the banner. | LOWER |
| CIP-005-4 | R3. | Monitoring Electronic Access — The Responsible Entity shall implement and document an electronic or manual process(es) for monitoring and logging access at access points to the Electronic Security Perimeter(s) twenty-four hours a day, seven days a week. | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-005-4 | R3.1. | For dial-up accessible Critical Cyber Assets that use non-routable protocols, the Responsible Entity shall implement and document monitoring process(es) at each access point to the dial-up device, where technically feasible. | MEDIUM |
| CIP-005-4 | R3.2. | Where technically feasible, the security monitoring process(es) shall detect and alert for attempts at or actual unauthorized accesses. These alerts shall provide for appropriate notification to designated response personnel. Where alerting is not technically feasible, the Responsible Entity shall review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days. | MEDIUM |
| CIP-005-4 | R4. | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of the electronic access points to the Electronic Security Perimeter(s) at least annually. The vulnerability assessment shall include, at a minimum, the following: | MEDIUM |
| CIP-005-4 | R4.1. | A document identifying the vulnerability assessment process; | LOWER |
| CIP-005-4 | R4.2. | A review to verify that only ports and services required for operations at these access points are enabled; | MEDIUM |
| CIP-005-4 | R4.3. | The discovery of all access points to the Electronic Security Perimeter; | MEDIUM |
| CIP-005-4 | R4.4. | A review of controls for default accounts, passwords, and network management community strings; | MEDIUM |
| CIP-005-4 | R4.5. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | MEDIUM |
| CIP-005-4 | R5. | Documentation Review and Maintenance — The Responsible Entity shall review, update, and maintain all documentation to support compliance with the requirements of Standard CIP-005-4. | LOWER |
| CIP-005-4 | R5.1. | The Responsible Entity shall ensure that all documentation required by Standard CIP- 005-4 reflect current configurations and processes and shall review the documents and procedures referenced in Standard CIP-005-4 at least annually. | LOWER |
| CIP-005-4 | R5.2. | The Responsible Entity shall update the documentation to reflect the modification of the network or controls within ninety calendar days of the change. | LOWER |
| CIP-005-4 | R5.3. | The Responsible Entity shall retain electronic access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-4. | LOWER |
| CIP-006-4c | R1. | Physical Security Plan — The Responsible Entity shall document, implement, and maintain a physical security plan, approved by the senior manager or delegate(s) that shall address, at a minimum, the following: | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| CIP-006-4c | R1.1. | All Cyber Assets within an Electronic Security Perimeter shall reside within an identified Physical Security Perimeter. Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity shall deploy and document alternative measures to control physical access to such Cyber Assets. | MEDIUM |
| CIP-006-4c | R1.2. | Identification of all physical access points through each Physical Security Perimeter and measures to control entry at those access points. | MEDIUM |
| CIP-006-4c | R1.3 | Processes, tools, and procedures to monitor physical access to the perimeter(s). | MEDIUM |
| CIP-006-4c | R1.4 | Appropriate use of physical access controls as described in Requirement R4 including visitor pass management, response to loss, and prohibition of inappropriate use of physical access controls. | MEDIUM |
| CIP-006-4c | R1.5 | Review of access authorization requests and revocation of access authorization, in accordance with CIP-004-4 Requirement R4. | MEDIUM |
| CIP-006-4c | R1.6 | A visitor control program for visitors (personnel without authorized unescorted access to a Physical Security Perimeter), containing at a minimum the following: | MEDIUM |
| CIP-006-4c | R1.6.1 | Logs (manual or automated) to document the entry and exit of visitors, including the date and time, to and from Physical Security Perimeters. | MEDIUM |
| CIP-006-4c | R1.6.2 | Continuous escorted access of visitors within the Physical Security Perimeter | MEDIUM |
| CIP-006-4c | R1.7 | Update of the physical security plan within thirty calendar days of the completion of any physical security system redesign or reconfiguration, including, but not limited to, addition or removal of access points through the Physical Security Perimeter, physical access controls, monitoring controls, or logging controls. | LOWER |
| CIP-006-4c | R1.8 | Annual review of the physical security plan. | LOWER |
| CIP-006-4c | R2 | Protection of Physical Access Control Systems — Cyber Assets that authorize and/or log access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers, shall: | MEDIUM |
| CIP-006-4c | R2.1. | Be protected from unauthorized physical access. | MEDIUM |
| CIP-006-4c | R2.2. | Be afforded the protective measures specified in Standard CIP-003-4; Standard CIP-004-4 Requirement R3; Standard CIP-005-4 Requirements R2 and R3; Standard CIP-006-4a Requirements R4 and R5; Standard CIP-007-4; Standard CIP-008-4; and Standard CIP- 009-4. | MEDIUM |
| CIP-006-4c | R3 | Protection of Electronic Access Control Systems — Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall reside within an | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| ramoer | Humber | identified Physical Security Perimeter. | |
| CIP-006-4c | R4 | Physical Access Controls — The Responsible Entity shall document and implement the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. The Responsible Entity shall implement one or more of the following physical access methods: Card Key: A means of electronic access where the access rights of the card | MEDIUM |
| | | holder are predefined in a computer database. Access rights may differ from one perimeter to another. | |
| | | Special Locks: These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. | |
| | | • Security Personnel: Personnel responsible for controlling physical access who may reside on-site or at a monitoring station. | |
| | | Other Authentication Devices: Biometric, keypad, token, or other equivalent devices that control physical access to the Critical Cyber Assets | |
| CIP-006-4c | R5 | Monitoring Physical Access — The Responsible Entity shall document and implement the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. Unauthorized access attempts shall be reviewed immediately and handled in accordance with the procedures specified in Requirement CIP-008-4. One or more of the following monitoring methods shall be used: | MEDIUM |
| | | • Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel responsible for response. | |
| | | • Human Observation of Access Points: Monitoring of physical access points by authorized personnel as specified in Requirement R4. | |
| CIP-006-4c | R6 | Logging Physical Access — Logging shall record sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. The Responsible Entity shall implement and document the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: | LOWER |
| | | Computerized Logging: Electronic logs produced by the Responsible Entity's | |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|--|--------|
| | | selected access control and monitoring method. | |
| | | • Video Recording: Electronic capture of video images of sufficient quality to determine identity. | |
| | | • Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4 | |
| CIP-006-4c | R7 | Access Log Retention — The responsible entity shall retain physical access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-4. | LOWER |
| CIP-006-4c | R8 | Maintenance and Testing — The Responsible Entity shall implement a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly. The program must include, at a minimum, the following: | MEDIUM |
| CIP-006-4c | R8.1 | Testing and maintenance of all physical security mechanisms on a cycle no longer than three years. | MEDIUM |
| CIP-006-4c | R8.2 | Retention of testing and maintenance records for the cycle determined by the Responsible Entity in Requirement R8.1. | LOWER |
| CIP-006-4c | R8.3 | Retention of outage records regarding access controls, logging, and monitoring for a minimum of one calendar year. | LOWER |
| CIP-007-4 | R1. | Test Procedures — The Responsible Entity shall ensure that new Cyber Assets and significant changes to existing Cyber Assets within the Electronic Security Perimeter do not adversely affect existing cyber security controls. For purposes of Standard CIP-007-4, a significant change shall, at a minimum, include implementation of security patches, cumulative service packs, vendor releases, and version upgrades of operating systems, applications, database platforms, or other third-party software or firmware. | MEDIUM |
| CIP-007-4 | R1.1. | The Responsible Entity shall create, implement, and maintain cyber security test procedures in a manner that minimizes adverse effects on the production system or its operation. | LOWER |
| CIP-007-4 | R1.2. | The Responsible Entity shall document that testing is performed in a manner that reflects the production environment. | LOWER |
| CIP-007-4 | R1.3. | The Responsible Entity shall document test results. | LOWER |
| CIP-007-4 | R2. | Ports and Services — The Responsible Entity shall establish, document and implement a process to ensure that only those ports and services required for normal and emergency operations are enabled. | MEDIUM |
| CIP-007-4 | R2.1. | The Responsible Entity shall enable only those ports and services required for normal | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| | | and emergency operations. | |
| CIP-007-4 | R2.2. | The Responsible Entity shall disable other ports and services, including those used for | MEDIUM |
| | | testing purposes, prior to production use of all Cyber Assets inside the Electronic Security Perimeter(s). | |
| CIP-007-4 | R2.3. | In the case where unused ports and services cannot be disabled due to technical limitations, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | MEDIUM |
| CIP-007-4 | R3. | Security Patch Management — The Responsible Entity, either separately or as a component of the documented configuration management process specified in CIP-003- 4 Requirement R6, shall establish, document and implement a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s). | LOWER |
| CIP-007-4 | R3.1. | The Responsible Entity shall document the assessment of security patches and security upgrades for applicability within thirty calendar days of availability of the patches or upgrades. | LOWER |
| CIP-007-4 | R3.2. | The Responsible Entity shall document the implementation of security patches. In any case where the patch is not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | LOWER |
| CIP-007-4 | R4. | Malicious Software Prevention — The Responsible Entity shall use anti-virus software and other malicious software ("malware") prevention tools, where technically feasible, to detect, prevent, deter, and mitigate the introduction, exposure, and propagation of malware on all Cyber Assets within the Electronic Security Perimeter(s). | MEDIUM |
| CIP-007-4 | R4.1. | The Responsible Entity shall document and implement anti-virus and malware prevention tools. In the case where anti-virus software and malware prevention tools are not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure. | MEDIUM |
| CIP-007-4 | R4.2. | The Responsible Entity shall document and implement a process for the update of anti- virus and malware prevention "signatures." The process must address testing and installing the signatures. | MEDIUM |
| CIP-007-4 | R5. | Account Management — The Responsible Entity shall establish, implement, and document technical and procedural controls that enforce access authentication of, and accountability for, all user activity, and that minimize the risk of unauthorized system access. | LOWER |
| CIP-007-4 | R5.1. | The Responsible Entity shall ensure that individual and shared system accounts and authorized access permissions are consistent with the concept of "need to know" with respect to work functions performed. | MEDIUM |
| CIP-007-4 | R5.1.1. | The Responsible Entity shall ensure that user accounts are implemented as approved by | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| Number | Number | designated personnel. Refer to Standard CIP-003-4 Requirement R5. | |
| CIP-007-4 | R5.1.2. | The Responsible Entity shall establish methods, processes, and procedures that generate logs of sufficient detail to create historical audit trails of individual user account access activity for a minimum of ninety days. | LOWER |
| CIP-007-4 | R5.1.3. | The Responsible Entity shall review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003-4 Requirement R5 and Standard CIP-004-4 Requirement R4. | MEDIUM |
| CIP-007-4 | R5.2. | The Responsible Entity shall implement a policy to minimize and manage the scope and acceptable use of administrator, shared, and other generic account privileges including factory default accounts. | LOWER |
| CIP-007-4 | R5.2.1. | The policy shall include the removal, disabling, or renaming of such accounts where possible. For such accounts that must remain enabled, passwords shall be changed prior to putting any system into service. | MEDIUM |
| CIP-007-4 | R5.2.2. | The Responsible Entity shall identify those individuals with access to shared accounts. | LOWER |
| CIP-007-4 | R5.2.3. | Where such accounts must be shared, the Responsible Entity shall have a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps for securing the account in the event of personnel changes (for example, change in assignment or termination). | MEDIUM |
| CIP-007-4 | R5.3. | At a minimum, the Responsible Entity shall require and use passwords, subject to the following, as technically feasible: | LOWER |
| CIP-007-4 | R5.3.1. | Each password shall be a minimum of six characters. | LOWER |
| CIP-007-4 | R5.3.2. | Each password shall consist of a combination of alpha, numeric, and "special" characters. | LOWER |
| CIP-007-4 | R5.3.3. | Each password shall be changed at least annually, or more frequently based on risk. | MEDIUM |
| CIP-007-4 | R6. | Security Status Monitoring — The Responsible Entity shall ensure that all Cyber Assets within the Electronic Security Perimeter, as technically feasible, implement automated tools or organizational process controls to monitor system events that are related to cyber security. | LOWER |
| CIP-007-4 | R6.1. | The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter. | MEDIUM |
| CIP-007-4 | R6.2. | The security monitoring controls shall issue automated or manual alerts for detected Cyber Security Incidents. | MEDIUM |
| CIP-007-4 | R6.3. | The Responsible Entity shall maintain logs of system events related to cyber security, where technically feasible, to support incident response as required in Standard CIP-008- 4. | MEDIUM |

| Standard Number | Requirement Number | Text of Requirement | VRF |
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| CIP-007-4 | R6.4. | The Responsible Entity shall retain all logs specified in Requirement R6 for ninety calendar days. | LOWER |
| CIP-007-4 | R6.5. | The Responsible Entity shall review logs of system events related to cyber security and maintain records documenting review of logs. | LOWER |
| CIP-007-4 | R7. | Disposal or Redeployment — The Responsible Entity shall establish and implement formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-4. | LOWER |
| CIP-007-4 | R7.1. | Prior to the disposal of such assets, the Responsible Entity shall destroy or erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | LOWER |
| CIP-007-4 | R7.2. | Prior to redeployment of such assets, the Responsible Entity shall, at a minimum, erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data. | LOWER |
| CIP-007-4 | R7.3. | The Responsible Entity shall maintain records that such assets were disposed of or redeployed in accordance with documented procedures. | LOWER |
| CIP-007-4 | R8 | Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of all Cyber Assets within the Electronic Security Perimeter at least annually. The vulnerability assessment shall include, at a minimum, the following: | LOWER |
| CIP-007-4 | R8.1. | A document identifying the vulnerability assessment process; | LOWER |
| CIP-007-4 | R8.2. | A review to verify that only ports and services required for operation of the Cyber Assets within the Electronic Security Perimeter are enabled; | MEDIUM |
| CIP-007-4 | R8.3. | A review of controls for default accounts; and, | MEDIUM |
| CIP-007-4 | R8.4. | Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan. | MEDIUM |
| CIP-007-4 | R9 | Documentation Review and Maintenance — The Responsible Entity shall review and update the documentation specified in Standard CIP-007-4 at least annually. Changes resulting from modifications to the systems or controls shall be documented within thirty calendar days of the change being completed. | LOWER |
| CIP-008-4 | R1. | Cyber Security Incident Response Plan — The Responsible Entity shall develop and maintain a Cyber Security Incident response plan and implement the plan in response to Cyber Security Incidents. The Cyber Security Incident response plan shall address, at a minimum, the following: | LOWER |
| CIP-008-4 | R1.1. | Procedures to characterize and classify events as reportable Cyber Security Incidents. | LOWER |

| Standard Number | Requirement Number | Text of Requirement | VRF |
|--------------------|-----------------------|---|--------|
| CIP-008-4 | R1.2. | Response actions, including roles and responsibilities of Cyber Security Incident response teams, Cyber Security Incident handling procedures, and communication plans. | LOWER |
| CIP-008-4 | R1.3. | Process for reporting Cyber Security Incidents to the Electricity Sector Information Sharing and Analysis Center (ES-ISAC). The Responsible Entity must ensure that all reportable Cyber Security Incidents are reported to the ES-ISAC either directly or through an intermediary. | LOWER |
| CIP-008-4 | R1.4. | Process for updating the Cyber Security Incident response plan within thirty calendar days of any changes. | LOWER |
| CIP-008-4 | R1.5. | Process for ensuring that the Cyber Security Incident response plan is reviewed at least annually. | LOWER |
| CIP-008-4 | R1.6. | Process for ensuring the Cyber Security Incident response plan is tested at least annually. A test of the Cyber Security Incident response plan can range from a paper drill, to a full operational exercise, to the response to an actual incident. | LOWER |
| CIP-008-4 | R2 | Cyber Security Incident Documentation — The Responsible Entity shall keep relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 for three calendar years. | LOWER |
| CIP-009-4 | R1 | Recovery Plans — The Responsible Entity shall create and annually review recovery plan(s) for Critical Cyber Assets. The recovery plan(s) shall address at a minimum the following: | MEDIUM |
| CIP-009-4 | R1.1. | Specify the required actions in response to events or conditions of varying duration and severity that would activate the recovery plan(s). | MEDIUM |
| CIP-009-4 | R1.2. | Define the roles and responsibilities of responders. | MEDIUM |
| CIP-009-4 | R2 | Exercises — The recovery plan(s) shall be exercised at least annually. An exercise of the recovery plan(s) can range from a paper drill, to a full operational exercise, to recovery from an actual incident. | LOWER |
| CIP-009-4 | R3 | Change Control — Recovery plan(s) shall be updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. Updates shall be communicated to personnel responsible for the activation and implementation of the recovery plan(s) within thirty calendar days of the change being completed. | LOWER |
| CIP-009-4 | R4 | Backup and Restore — The recovery plan(s) shall include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. For example, backups may include spare electronic components or equipment, written documentation of configuration settings, tape backup, etc. | LOWER |
| CIP-009-4 | R5 | Testing Backup Media — Information essential to recovery that is stored on backup media shall be tested at least annually to ensure that the information is available. Testing can be completed off site. | LOWER |