



NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## **Revised Implementation Plan for Version 2 of Cyber Security Standards CIP-002-2 through CIP-009-2 January 20, 2010**

### **Prerequisite Approvals**

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

### **Modified Standards**

The following standards have been modified:

- CIP-002-2 — Cyber Security — Critical Cyber Asset Identification
- CIP-003-2 — Cyber Security — Security Management Controls
- CIP-004-2 — Cyber Security — Personnel and Training
- CIP-005-2 — Cyber Security — Electronic Security Perimeter(s)
- CIP-006-2 — Cyber Security — Physical Security
- CIP-007-2 — Cyber Security — Systems Security Management
- CIP-008-2 — Cyber Security — Incident Reporting and Response Planning
- CIP-009-2 — Cyber Security — Recovery Plans for Critical Cyber Assets

Red-line versions of the above standards are posted with this Implementation Plan. When these modified standards become effective, the prior versions of these standards and their Implementation Plan are retired.

### **Compliance with Standards**

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

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

Newly registered entities must comply with the requirements of CIP-002-2 through CIP-009-2 within 24 months of registration. The sole exception is CIP-003-2 R2 where the newly registered entity must comply within 12 months of registration.

### **Proposed Effective Date**

The proposed effective date for these modified standards is the first day of the third calendar quarter (i.e., a minimum of two full calendar quarters, and not more than three calendar quarters) after applicable regulatory approvals have been received (or the Reliability Standard otherwise becomes effective the first day of the third calendar quarter after BOT adoption in those jurisdictions where regulatory approval is not required).

For example, if regulatory approval is granted in June, the standards would become effective January 1 of the following year. If regulatory approval is granted in July, the standards would become effective April 1 of the following year.

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

On September 15, 2009, NERC filed for FERC approval an implementation plan for the CIP Version 1 standards (CIP-002-1 through CIP-009-1) for owners and operators of US nuclear power plants in compliance with Order 706-B. In the plan, compliance with the Version 1 standards is predicated upon the latter of the effective date of the order approving the implementation plan plus eighteen months; the determination of the scope of systems, structures, and components within the NERC and NRC jurisdictions plus ten months; or within six months following the completion of the first refueling outage beyond eighteen months from FERC approval of the implementation plan for those requirements requiring a refueling outage. Since that September 15, 2009 filing of the Version 1 implementation plan, FERC approved Version 2 of the NERC CIP standards on September 30, 2009 and NERC filed for FERC approval Version 3 CIP standards on December 29, 2009.

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

For example, if FERC approves the Version 1 implementation plan effective on May 1, 2010<sup>1</sup> and using the operative date for compliance to Version 1 standards as the FERC effective date of the order plus eighteen months, then compliance to the Version 1 standards would be required on November 1, 2011. However, since Version 1 will have been replaced by Version 2 and perhaps

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

Version 3 by November, 2011, compliance to the Version 2 or Version 3 standards (whichever the current version is effective at that time) would therefore be required on November 1, 2011.

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