

# Project 2016-02 Consideration of Issues and Directives

## CIP V5 Issues for Standard Drafting Team Consideration<sup>1</sup>

From experience in the V5 Transition Study and the on-going implementation efforts, the CIP Version 5 Transition Advisory Group (V5TAG) identified specific issues with the CIP Version 5 standard language that caused difficulty in implementation of the requirements. In many cases, the V5TAG members found that select language within the CIP Version 5 standards may be understood in multiple ways. These interpretations appear to go beyond the intended flexibility of the standard language that is necessary to accommodate the diverse nature of facts and circumstances across the electric sector.

The Standard Drafting Team modified Standard CIP-002-6 to address the issue of Transmission Owner (TO) Control Centers performing the functional obligations of the Transmission Operator (TOP).

### Issues from CIP V5 Issues for Standard Drafting Team Consideration

Issue Language	Consideration of Issue
CIP-002-5.1, Attachment 1 Control Center criteria for additional clarity and for possible revisions related to TOP or TO Control Centers performing the functional obligations of a TOP, in particular for small or lower-risk entities. A potential revision could be a size for criteria 2.12, Control Centers performing the functional obligations of a TOP.	The Project 2016-02 Standard Drafting Team (SDT) revised Reliability Standard CIP-002-6, Attachment 1, Criterion 2.12 to address all Control Centers or backup Control Centers of Transmission, regardless of registration. The revision provides a bright line threshold that categorizes <u>BES Cyber Systems used by and located at</u> Control Centers <u>of Transmission containing BES</u>

<sup>1</sup> [http://www.nerc.com/pa/Stand/Project%20201602%20Modifications%20to%20CIP%20Standards%20DL/Transfer\\_Issues\\_V5TAG-SDT\\_1st-final-03232016.pdf](http://www.nerc.com/pa/Stand/Project%20201602%20Modifications%20to%20CIP%20Standards%20DL/Transfer_Issues_V5TAG-SDT_1st-final-03232016.pdf)

Issues from CIP V5 Issues for Standard Drafting Team Consideration

Issue Language	Consideration of Issue
	<del>Cyber Systems to be categorized</del> as medium impact. The reference to Transmission Operator has been removed to provide clarity.
Clarify the applicability of requirements on a TO Control Center that perform the functional obligations of a TOP, particularly if the TO has the ability to operate switches, breakers and relays in the BES. Review the corresponding Guidelines and Technical Basis of CIP-002-5.1, specifically: the “CIP-002-5” section paragraph starting with “Responsibility for the reliable operation of the BES is spread across all Entity Registrations”; the table following that paragraph; the “High Impact Rating (H)” section; and the criterion bullets for Control Centers under the “Medium Impact Rating (M)” section.	The revised Reliability Standard CIP-002-6, Attachment 1, Criterion 2.12 provides a bright line threshold that categorizes BES Cyber Systems <u>used by and located at associated with</u> Control Centers of Transmission as medium impact. All other BES Cyber Systems associated with Control Centers of Transmission that do not <del>meet</del> <u>exceed</u> the bright line threshold will be categorized as low impact. Based on this categorization, the requirements applicable to the Control Center’s BES Cyber Systems are clearly defined through the Applicable Systems language throughout Standards CIP-003 through CIP-011.
The definition of Control Center (if pursued, recognize possible impacts on operations and planning standards and/or glossary terms that include ‘Control Center’, for example, the revised Glossary term for “System Operator” to be effective July 1, 2016).	The SDT is considering revisions to the definition of Control Center, but asserts that the modifications to Criterion 2.12 of CIP-002-6, Attachment 1 effectively address the concerns raised by the V5TAG regarding Transmission Owner Control Centers.
The language scope of “perform the functional obligations of” throughout the Attachment 1 criteria.	The SDT contends that the issue raised by the V5TAG is uniquely associated with small Transmission Owner Control Centers and Transmission Operator Control Centers ( <u>criteria 2.12</u> ), and <u>therefore has determined that</u> Reliability Standard CIP-002-5.1a,

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Issue Language	Consideration of Issue
	Attachment 1, Criteria 1.1, 1.2, 1.3, 1.4, 2.11, and 2.13 are sufficiently clear and do not need modification.