# Project 2018-02 Modifications to CIP-008

Cyber Security Incident Reporting

Standard Drafting Team Meeting
September 17, 2018 2:00-4:00 p.m. Eastern

RELIABILITY | ACCOUNTABILITY

## Administrative

- Review NERC Antitrust Compliance Guidelines and Public Announcement
- Roll Call and Determination of Quorum

## Agenda Items

- Chair/Vice Chair Introductions and Remarks
- Review FERC Order 848
- Review Standards Process
- Objectives for First in-person meeting
- Review Project Timeline
- Future In-person Meetings (Sept 24-26, November 6-8, December 11-13)
- Adjourn

RELIABILITY | ACCOUNTABILITY

## Administrative

- Review NERC Antitrust Compliance Guidelines and Public Announcement
- Roll Call and Determination of Quorum

## Introductions

- Chair/Vice Chair Introductions and Remarks, and team introductions

| Dave Rosenthal (C) | Kristine Martz (VC) | Steve Brain |
|---|---|---|
| Sharon Koller | Norm Dang | John Gasstrom |
| Tina Weyand | Tony Hall | Jennifer Korenblatt |
| John Breckenridge | Ian King | Katherine Anagnost |

Alison Z. Oswald – NERC Sr. Standards Developer

- Order Issue Date: July 19, 2018

- Order Fed. Reg. Publish Date: July 31, 2018

- Order Effective Date: October 1, 2018

- Directive Filing Deadline: April 1, 2019

RELIABILITY | ACCOUNTABILITY

1. Augment reporting to include Cyber Security Incidents that compromise or attempt to compromise a Responsible Entity's Electronic Security Perimeter or associated Electronic Access Control or Monitoring Systems

2. Required information in Cyber Security Incident reports should include certain minimum information to improve the quality of reporting and allow for ease of comparison by ensuring that each report includes specified fields of information

3. Filing deadlines for Cyber Security Incident reports should be established once a compromise or disruption to reliable BES operation, or an attempted compromise or disruption, is identified by a Responsible Entity

4. Reports should continue to be sent to the E-ISAC, but the reports should also be sent to the Department of Homeland Security (DHS) Industrial Control Systems Cyber Emergency Response Team (ICS-CERT)

# Standards Development Process
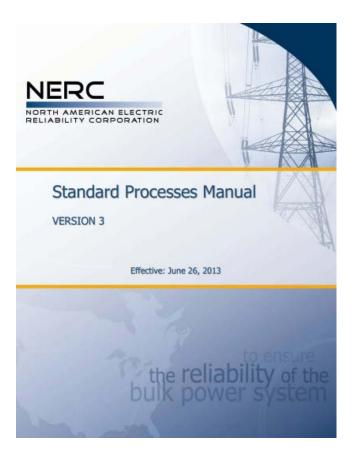
RELIABILITY | ACCOUNTABILITY

- Governed by the Rules of Procedure, Appendix 3A: Standard Processes Manual (SPM) - Version 3, effective June 26, 2013

- Develop an excellent, technically correct standard that helps provide an adequate level of reliability and achieves consensus
  - Stay within the scope of the SAR
  - Address regulatory directives and stakeholder issues
  - Consider Independent Experts' Review Panel input
  - Ensure standard meets criteria for approval
- Develop modifications of Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) and associated reasoning
- Develop Implementation Plan
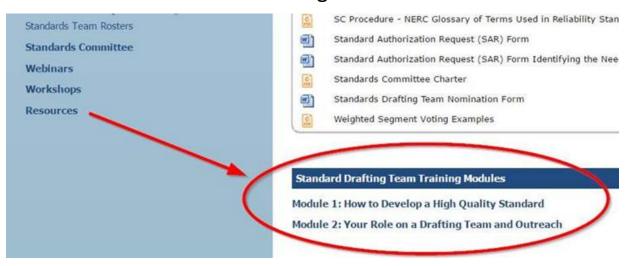- Develop supporting documents (optional)
- Outreach

RELIABILITY | ACCOUNTABILITY

- Drafting team chair and vice chair

- NERC standards developer

- Subject Matter Experts (SMEs)

- Legal

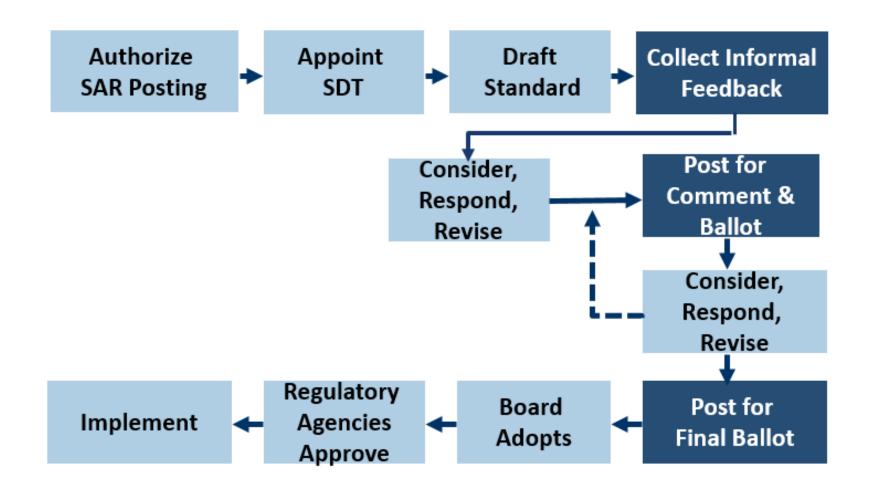- FERC staff observers

- Industry observers

- All Standards Drafting Team members must complete training
  - Two modules
    - Module 1: How to Develop a High Quality Standard
    - Module 2: Your Role on a Drafting Team and Outreach



  - Send Certificate when training is complete
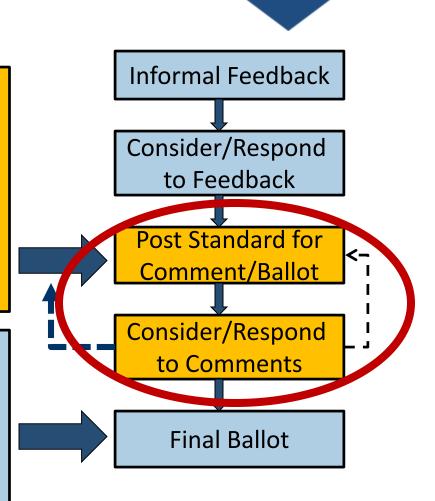
**Initial/Additional Ballot:**

At this step, the standard is either "new" or significantly changed from the last version posted for comment/ballot.

**Final Ballot:**

At this step, there have been no significant changes to the standard from the last ballot. The ballot record starts with all votes and comments from the previous ballot.

Informal Feedback

Consider/Respond to Feedback

Post Standard for Comment/Ballot

Consider/Respond to Comments

Final Ballot

## Typically 45-day period

- 45-day comment period
- 10-day ballot
- These periods may vary due to:
  - Waivers necessary to meet regulatory directives or NERC Board deadlines

## Consideration of Comments

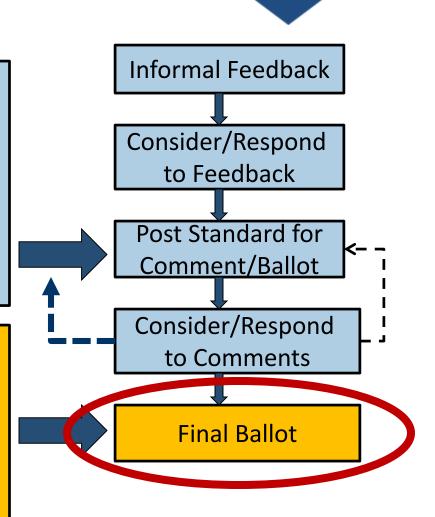- The drafting team must communicate changes to stakeholders

RELIABILITY | ACCOUNTABILITY

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# Be Prepared!!!

- For our first in person meeting, please bring:
  - Options for draft language
    - Not just requirement language but for incident reporting form
  - Potential mock-up of draft incident reporting form
  - Pain points where people believe there will be issues
    - This can notional, but we need to get ahead of our challenges
- There will be a public posting after the first meeting
  - Draft requirement language, incident reporting form as well as:
    - Draft implementation plan
    - Comment form that is used with the first public posting

- Leverage outreach AND your company/associations
  - Again, please come prepared

| Anticipated Date | Location | Event | Comments |
|---|---|---|---|
| September 17, 2018 | Conference Call | SDT Webex | Introduce team, review objectives for first meeting |
| September 24-26, 2018 | Atlanta, GA | SDT in-person meeting to modify the CIP-008-5 standard | |
| September 27, 2018 | - | Quality Review and Admin Review | |
| September 28, 2018 | Conference Call | SDT Meeting to review feedback from Quality Review | |
| October 4 – 23, 2018 | - | Post CIP-008 Standard for 20-day comment and ballot | |
| Week of October 15, 2018 | Conference Call | Webinar to educate industry on changes | |
| October 24-November 2, 2018 | - | Consolidate comments and distribute to team | Team conference call to assign comments to members to address |
| November 6-8, 2018 | TBD | Second SDT in-person meeting to respond to comments and modify as necessary | |
| November 9, 2018 | | Quality Review and Admin Review | |
| November 13, 2018 | Conference Call | SDT Meeting to review feedback from Quality Review | |
| November 14 – 28, 2018 | - | Post for an additional comment and ballot | Waiver of the time frame to shorten from 45 days to 15 days. |
| November29 - December 7, 2018 | - | Consolidate comments and distribute to team | Team conference call if necessary to assign comments to members to address |
| December 11-13, 2018 | TBD | SDT Meeting to respond to comments and move to a final ballot | |
| January 14 – 18, 2019 | - | Post for Final Ballot | Shortened to 5 days. |
| February 6-7, 2019 | - | NERC Board of Trustees Adoption | |
| February 2019 | - | NERC Files Petition with the Applicable Governmental Authorities | |

**RELIABILITY | ACCOUNTABILITY**

- September 24-26, 2018
  - Atlanta, GA at NERC office
  - begin at 1pm, end at 3pm
- November 6-8, 2018
  - Location TBD
- December 11-13, 2018
  - Location TBD

# Questions and Answers