

# Implementation Plan

## Project 2019-02 BES Cyber System Information Access Management Reliability Standard CIP-004 and CIP-011

### Applicable Standard(s)

- CIP-004-X – Cyber Security - Personnel & Training
- CIP-011-X – Cyber Security - Information Protection

### Requested Retirement(s)

- CIP-004-6 – Cyber Security - Personnel & Training
- CIP-011-2 – Cyber Security - Information Protection

### Prerequisite Standard(s)

- None

### Applicable Entities

- Balancing Authority
- Distribution Provider<sup>1</sup>
- Generator Operator
- Reliability Coordinator
- Transmission Operator
- Transmission Owner

### Background

The purpose of Project 2019-02 BES Cyber System Information (BCSI) Access Management is to clarify the CIP requirements related to both managing access and securing BCSI. This project proposes revisions to Reliability Standards CIP-004-6 and CIP-011-2.

The proposed revisions enhance BES reliability by creating increased choice, greater flexibility, higher availability, and reduced-cost options for entities to manage their BCSI. In addition, the proposed revisions clarify the protections expected when utilizing third-party solutions (e.g., cloud services).

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<sup>1</sup> See subject standards for additional information on Distribution Providers subject to the standards.

## General Considerations

The 24-month period provides Responsible Entities with sufficient time to come into compliance with new and revised Requirements, including taking steps to:

- Implement electronic technical mechanisms to mitigate the risk of unauthorized access to BCSI when Responsible Entities elect to use vendor services;
- Establish and/or modify vendor relationships to ensure compliance with the updated CIP-004 and CIP-011; and
- Administrative overhead to review their program.

The 24-month implementation period will allow budgetary cycles for Responsible Entities to allocate the proper amount of resources to support implementation of the updated CIP-004 and CIP-011. In addition, the implementation period will provide Electric Reliability Organization (ERO) and Responsible Entities flexibility in case of unforeseen circumstances or events and afford the opportunity for feedback to be provided to the ERO and Responsible Entities through various communication vehicles within industry (e.g., NERC Reliability Standards Technical Committee, North American Transmission Form), which will encourage more ownership and commitment by Responsible Entities to adhere to the updated CIP-004 and CIP-011.

## Effective Date

### CIP-004-X – Cyber Security - Personnel & Training

Where approval by an applicable governmental authority is required, the standard shall become effective on the first day of the first calendar quarter that is twenty-four (24) months after the effective date of the applicable governmental authority's order approving the standard, or as otherwise provided for by the applicable governmental authority.

Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is twenty-four (24) months after the date the standard is adopted by the NERC Board of Trustees, or as otherwise provided for in that jurisdiction.

### CIP-011-X – Cyber Security - Information Protection

Where approval by an applicable governmental authority is required, the standard shall become effective on the first day of the first calendar quarter that is twenty-four (24) months after the effective date of the applicable governmental authority's order approving the standard, or as otherwise provided for by the applicable governmental authority.

Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is twenty-four (24) months after the date the standard is adopted by the NERC Board of Trustees, or as otherwise provided for in that jurisdiction.

### **Initial Performance of Periodic Requirements**

Responsible Entities shall initially comply with the periodic requirements in the CIP-004-X and CIP-011-X within the periodic timeframes of their last performance under the CIP-004-6 and CIP-011-2.

### **Compliance Dates for Early Adoption of Revised CIP Standards**

A Responsible Entity may elect to comply with the requirements in CIP-004-X and CIP-011-X following their approval by the applicable governmental authority, but prior to their Effective Date. In such a case, the Responsible Entity shall notify the applicable Regional Entities of the date of compliance with the CIP-004-X and CIP-011-X Reliability Standards. Responsible Entities must comply with CIP-004-6 and CIP-011-2 until that date.

### **Retirement Date**

#### **CIP-004-6 – Cyber Security - Personnel & Training**

Reliability Standard CIP-004-6 shall be retired immediately prior to the effective date of CIP-004-X in the particular jurisdiction in which the revised standard is becoming effective.

#### **CIP-011-2 – Cyber Security - Information Protection**

Reliability Standard CIP-011-2 shall be retired immediately prior to the effective date of CIP-011-X in the particular jurisdiction in which the revised standard is becoming effective.