

# Implementation Plan

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

### Applicable Standard(s)

- CIP-004-7 – Cyber Security - Personnel & Training
- CIP-011-3 – 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
- Interchange Coordinator or Interchange Authority
- Reliability Coordinator
- Transmission Operator
- Transmission Owner
- Facilities<sup>2</sup>

### Background

The purpose of Project 2019-02 BES Cyber System Information Access Management is to clarify the CIP requirements related to both managing access and securing BES Cyber System Information (BCSI). This project proposes revisions to Reliability Standards CIP-004-6 and CIP-011-2, including moving some existing CIP-004-6 Requirements to proposed CIP-011-3.

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

<sup>2</sup> See subject standards for additional information on Facilities subject to the standards.

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

### **General Considerations**

This standard will become effective 18 months following regulatory approval. The 18-month period provides Responsible Entities with sufficient time to come into compliance with new and revised Requirements, including taking steps to:

- Establish and/or modify vendor relationships to establish compliance with the revised CIP-011-3 Requirements;
- Address the increased scope of the CIP-011-3 “Applicable Systems” and “Applicability” column, which has a focus on BES Cyber System Information as well as the addition of Protected Cyber Assets (PCA); and
- Develop additional sanitization programs for the life cycle of BES Cyber Systems, if necessary.

### **Effective Date**

#### **CIP-004-7 – 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 eighteen (18) 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 eighteen (18) months after the date the standard is adopted by the NERC Board of Trustees, or as otherwise provided for in that jurisdiction.

#### **CIP-011-3 – 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 eighteen (18) 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 eighteen (18) months after the date the standard is adopted by the NERC Board of Trustees, or as otherwise provided for in that jurisdiction.

### **Retirement Date**

#### **CIP-004-7 – Cyber Security - Personnel & Training**

Reliability Standard CIP-004-6 shall be retired immediately prior to the effective date of CIP-004-7 in the particular jurisdiction in which the revised standard is becoming effective.

**CIP-011-3 – Cyber Security - Information Protection**

Reliability Standard CIP-011-2 shall be retired immediately prior to the effective date of CIP-011-3 in the particular jurisdiction in which the revised standard is becoming effective.