

Meeting Notes

Project 2023-06 CIP-014 Risk Assessment Refinement Drafting Team

December 3, 2024 | 10:00 a.m. – 5:00 p.m., Eastern;

December 4, 2024 | 8:30 a.m. – 5:00 p.m., Eastern;

December 5, 2024 | 8:30 a.m. – 12:00 p.m., Eastern.

Introduction and Chair's Remarks

The meeting started at 10:00 p.m. Eastern. The Chair welcomed the Drafting Team (DT) members and the participants from the industry. See **Attachment 1** for those in attendance.

NERC Antitrust Compliance Guidelines and Public Announcement

The NERC Antitrust Compliance Guidelines, NERC Participant Conduct Policy, and the Public Announcement were presented and reviewed by the secretary. This is an in-person meeting. Site safety was briefly discussed by the FRCC staff.

Agenda Items

1. Develop Draft of Standard, Implementation Plan, VRFs and VSLs

- a. The drafting team continued to review the comments received from the industry. The Standard and Technical Rationale Document were modified accordingly. For Requirement R5, Part 5.2, if a previous risk assessment has identified a Transmission station or Transmission substation as causing instability, uncontrolled separation, or Cascading within an Interconnection when rendered inoperable or damaged, then the TO may forgo additional assessments on that Transmission station or Transmission substation. Requirements R5.3 and R7 through R10 still apply to that Transmission station or Transmission substation until new risk assessment demonstrates otherwise.
- b. Rationale for Requirement R5: An objective of the CIP-014-3 Risk Assessment Refinement SAR was to align study periods, frequency of studies and the powerflow models used for the studies. A 36-month periodicity was chosen for the R4 risk assessment to reduce the periodicity options from previous versions of the standard. Additionally, a single study periodicity is more easily aligned with project in-service date considerations and model choices. As called for in Project Scope item 3 of the CIP-014-3 Risk Assessment Refinement SAR, the risk assessment must comply with the methodology developed in R3, so this language was explicitly added to R5. Joint ownership of Transmission substations and Transmission stations was discussed in the Guidelines and Technical Basis of previous versions of the CIP-014 standard. Because the CIP-014-3 Risk Assessment Refinement SAR calls for clarification regarding Transmission substations and Transmission stations of differing ownership, this section was moved to its own requirement within R5. Transmission Owners shall review and, if necessary, update the list of applicable Transmission station(s) or Transmission substation(s) per Attachment 1 every 36 months. The list of applicable Transmission station(s) or Transmission substation(s) shall include

existing or planned to be in service within 36 months Transmission station(s) and Transmission substation(s). The 36-month cycle for updating the list of applicable Transmission station(s) or Transmission substation(s) per Attachment 1 aligns with the annual cycle for performing Planning Assessments per NERC Standard TPL-001. The 36-month risk assessment study cycle aligns with the 36-month planned-to-be-in-service date.

- c. The drafting team also reviewed the VRF/VSL to make sure that everything is correct.
- d. The drafting team also took a vote (6 No, 1 Yes, 1 Abstain) whether to modify Requirement R3 because there was a suggestion: identified during dynamic or steady-state simulations in a previous CIP-014-4 risk assessment cycle. If a previous risk assessment has identified a Transmission station or Transmission substation as causing instability, uncontrolled separation, or Cascading within an Interconnection when rendered inoperable or damaged, then the TO may forgo additional assessments on that Transmission station or Transmission substation. Requirements R5.3 and R7 through R10 still apply to that Transmission station or Transmission substation until a new risk assessment demonstrates otherwise. Per Requirement R3, each Transmission Owner is required to have a risk assessment methodology, but the SDT intends for each TO to have flexibility to define its own methodology, including the criteria by which analytical results will be examined to identify Transmission station(s) or Transmission substation(s) that if rendered inoperable or damaged as a result of a physical attack could result in instability, uncontrolled separation, or Cascading within an Interconnection. The methodology could include rationale for not performing steady state and dynamic analysis, if the TO has deemed the station critical for physical security. The TO is not required to develop its own methodology and is free to use a methodology developed elsewhere, such as in coordination with neighboring TOs or ISOs. The methodology could include rationale for not performing steady state and dynamic analysis, if the TO has deemed the station critical for physical security.
- e. Requirement R1 TR to incorporate the timing of planned to be in service and commencement of risk assessment.
- f. Fix the VSL for R2 to remove the word "proximity". The DT believes that simulation of a fault is a reasonable assumption for possible events that could impact a single Transmission station or Transmission substation, and for events that could simultaneously impact multiple Transmission stations or Transmission substations. The DT does not believe that specification of fault type (e.g., 3-phase faults or single-line-to-ground faults) was mandated by the SAR, and furthermore believes that such a specification is a) too prescriptive and b) potentially creates scenarios that do not match up with plausible threat vectors assessed and managed by corporate security personnel complying with CIP-014 Requirements R7 – R10. The DT furthermore believes that simulation of a no-fault event is not a reasonable assumption for physical attacks under CIP-014. While plausible, no-fault events are not in keeping with the direction of the SAR.

2. Adjourn

Meeting was adjourned at 5:00 pm (Eastern) on the first day, 4:48 pm on the second day, and 11:52 am on the third day.

Attachment 1

Name	Company	Member/Observer	Date
Kirpal Bahra	Hydro One	Member	12/3-5/2024
Patrick Quinn	GR Energy	Vice Chair	12/3-5/2024
Per-Anders Lof	National Grid	Observer	12/3-5/2024
David Schooley	ComEd	Member	12/3-5/2024
Bart White	Duke Energy	Member	12/3-5/2024
Mina Turner	AEP	Observer	12/3-5/2024
Karl Perman	CIP Corps	Observer	12/3-5/2024
Qamar Arsalan	PSEG	Observer	12/3-5/2024
Mike Johnson	Earthlink	Observer	12/3-5/2024
Bob Pierce	Duke Energy	NERC Staff	12/3-5/2024
Mina Turner	AEP	Observer	12/3-5/2024
Judy Sciallo	FERC	Observer	12/3-5/2024
Andres Esquerro	FERC	Observer	12/3-5/2024
Mike Johnson	Earthlink	Observer	12/3-5/2024
Sarah Crawford	NERC	NERC Staff	12/3-5/2024