

Project 2014-04 Physical Security

VRF and VSL Justifications for CIP-014-2

VRF and VSL Justifications – CIP-014-1, R1	
Proposed VRF	High
NERC VRF Discussion	Initial and subsequent risk assessments identify Transmission stations or Transmission substations that need to be assessed for threats and vulnerabilities and potential physical security measures. Since this is a Requirement in a planning time frame, a violation could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly cause or contribute to bulk electric system instability, separation, or a cascading sequence of failures, or could place the bulk electric system at an unacceptable risk of instability, separation, or cascading failures, or could hinder restoration to a normal condition. This justifies a High VRF for this requirement.
FERC VRF G1 Discussion	<i>Guideline 1- Consistency w/ Blackout Report</i> This requirement does not address any of the critical areas identified in the Final Blackout Report.
FERC VRF G2 Discussion	<i>Guideline 2- Consistency within a Reliability Standard</i> The Requirement Parts for this Requirement provide additional detail regarding the risk assessment periodicity and the identification of the primary control center that has operational control of Transmission stations and/or Transmission substations.
FERC VRF G3 Discussion	<i>Guideline 3- Consistency among Reliability Standards</i> The comparable CIP-002-5.1 R1, which deals with categorizing cyber systems, is assigned a High VRF.
FERC VRF G4 Discussion	<i>Guideline 4- Consistency with NERC Definitions of VRFs</i> See “NERC VRF Discussion” above.
FERC VRF G5 Discussion	<i>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</i> This guideline is not applicable, as the requirement does not co-mingle more than one obligation.
Proposed Lower VSL	The Transmission Owner performed an initial risk assessment but did so after the date specified in the implementation plan for performing the initial risk assessment but less than or equal to two calendar months after that date;

VRF and VSL Justifications – CIP-014-1, R1

	<p>OR</p> <p>The Transmission Owner that has identified in its previous risk assessment one or more Transmission stations or Transmission substations that if rendered inoperable or damaged could result in instability, uncontrolled separation, or Cascading within an Interconnection performed a subsequent risk assessment but did so after 30 calendar months but less than or equal to 32 calendar months;</p> <p>OR</p> <p>The Transmission Owner that has not identified in its previous risk assessment any Transmission stations or Transmission substations that if rendered inoperable or damaged could result in instability, uncontrolled separation, or Cascading within an Interconnection performed a subsequent risk assessment but did so after 60 calendar months but less than or equal to 62 calendar months.</p>
Proposed Moderate VSL	<p>The Transmission Owner performed an initial risk assessment but did so more than two calendar months after the date specified in the implementation plan for performing the initial risk assessment but less than or equal to four calendar months after that date;</p> <p>OR</p> <p>The Transmission Owner that has identified in its previous risk assessment one or more Transmission stations or Transmission substations that if rendered inoperable or damaged could result in instability, uncontrolled separation, or Cascading within an Interconnection performed a subsequent risk assessment but did so after 32 calendar months but less than or equal to 34 calendar months;</p> <p>OR</p> <p>The Transmission Owner that has not identified in its previous risk assessment any Transmission stations or Transmission substations that if rendered inoperable or damaged could result in instability, uncontrolled separation, or Cascading within an Interconnection performed a subsequent risk assessment but did so after 62 calendar months but less than or equal to 64 calendar months.</p>
Proposed High VSL	<p>The Transmission Owner performed an initial risk assessment but did so more than four calendar months after the date specified in the implementation plan for performing the initial risk assessment but less than or equal to six calendar months after that date;</p>

VRF and VSL Justifications – CIP-014-1, R1

	<p>OR</p> <p>The Transmission Owner that has identified in its previous risk assessment one or more Transmission stations or Transmission substations that if rendered inoperable or damaged could result in instability, uncontrolled separation, or Cascading within an Interconnection performed a subsequent risk assessment but did so after 34 calendar months but less than or equal to 36 calendar months;</p> <p>OR</p> <p>The Transmission Owner that has not identified in its previous risk assessment any Transmission stations or Transmission substations that if rendered inoperable or damaged could result in instability, uncontrolled separation, or Cascading within an Interconnection performed a subsequent risk assessment but did so after 64 calendar months but less than or equal to 66 calendar months;</p> <p>OR</p> <p>The Transmission Owner performed a risk assessment but failed to include Part 1.2.</p>
<p>Proposed Severe VSL</p>	<p>The Transmission Owner performed an initial risk assessment but did so more than six calendar months after the date specified in the implementation plan for performing the initial risk assessment;</p> <p>OR</p> <p>The Transmission Owner failed to perform an initial risk assessment;</p> <p>OR</p> <p>The Transmission Owner that has identified in its previous risk assessment one or more Transmission stations or Transmission substations that if rendered inoperable or damaged could result in instability, uncontrolled separation, or Cascading within an Interconnection performed a subsequent risk assessment but did so after more than 36 calendar months;</p> <p>OR</p> <p>The Transmission Owner that has identified in its previous risk assessment one or more Transmission stations or Transmission substations that if rendered inoperable or damaged could result in instability, uncontrolled separation, or Cascading within an Interconnection failed to perform a risk assessment;</p> <p>OR</p> <p>The Transmission Owner that has not identified in its previous risk</p>

VRF and VSL Justifications – CIP-014-1, R1	
	<p>assessment any Transmission stations or Transmission substations that if rendered inoperable or damaged could result in instability, uncontrolled separation, or Cascading within an Interconnection performed a subsequent risk assessment but did so after more than 66 calendar months;</p> <p>OR</p> <p>The Transmission Owner that has not identified in its previous risk assessment any Transmission station and Transmission substations that if rendered inoperable or damaged could result in instability, uncontrolled separation, or Cascading within an Interconnection failed to perform a subsequent risk assessment.</p>
<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>This guideline is not applicable because this is a new requirement.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is not binary.</p> <p>Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly or partially violated if the risk assessment is not performed or if the risk assessment is not performed within required intervals.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The language of the VSL directly mirrors the language in the corresponding requirement.</p>

VRF and VSL Justifications – CIP-014-1, R1

FERC VSL G4

Violation Severity Level
Assignment Should Be Based
on A Single Violation, Not on A
Cumulative Number of
Violations

The VSL is assigned for a single instance of failing to submit perform a risk assessment.

VRF and VSL Justifications – CIP-014-1, R2	
Proposed VRF	Medium
NERC VRF Discussion	Unaffiliated third party verification of initial and subsequent risk assessments provides reinforcement that the risk assessment was performed with due consideration to risk to the bulk power system. Since this Requirement is in a planning time frame, a violation could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly and adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system. However, violation of this requirement is unlikely, under emergency, abnormal, or restoration conditions anticipated by the preparations, to lead to bulk electric system instability, separation, or cascading failures, nor to hinder restoration to a normal condition. This justifies a Medium VRF for this requirement.
FERC VRF G1 Discussion	<i>Guideline 1- Consistency w/ Blackout Report</i> This requirement does not address any of the critical areas identified in the Final Blackout Report.
FERC VRF G2 Discussion	<i>Guideline 2- Consistency within a Reliability Standard</i> The Requirement Parts for this Requirement provide additional detail regarding the unaffiliated third party verification including entities that may perform the verification, provisions for adding or removing Transmission stations and/or Transmission substations, and provisions for confidentiality of sensitive information.
FERC VRF G3 Discussion	<i>Guideline 3- Consistency among Reliability Standards</i> The comparable EOP-005-2 R6, which deals with verifying that its restoration plan accomplishes its intended function is assigned a medium VRF.
FERC VRF G4 Discussion	<i>Guideline 4- Consistency with NERC Definitions of VRFs</i> See “NERC VRF Discussion” above.
FERC VRF G5 Discussion	<i>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</i> This guideline is not applicable, as the requirement does not co-mingle more than one obligation.
Proposed Lower VSL	The Transmission Owner had an unaffiliated third party verify the risk assessment performed under Requirement R1 but did so in more than 90 calendar days but less than or equal to 100 calendar days following completion of Requirement R1;

VRF and VSL Justifications – CIP-014-1, R2

	<p>OR</p> <p>The Transmission Owner had an unaffiliated third party verify the risk assessment performed under Requirement R1 and modified or documented the technical basis for not modifying its identification under Requirement R1 as required by part 2.3 but did so more than 60 calendar days and less than or equal to 70 calendar days from completion of the third party verification.</p>
Proposed Moderate VSL	<p>The Transmission Owner had an unaffiliated third party verify the risk assessment performed under Requirement R1 but did so more than 100 calendar days but less than or equal to 110 calendar days following completion of Requirement R1;</p> <p>Or</p> <p>The Transmission Owner had an unaffiliated third party verify the risk assessment performed under Requirement R1 and modified or documented the technical basis for not modifying its identification under Requirement R1 as required by part 2.3 but did so more than 70 calendar days and less than or equal to 80 calendar days from completion of the third party verification.</p>
Proposed High VSL	<p>The Transmission Owner had an unaffiliated third party verify the risk assessment performed under Requirement R1 but did so more than 110 calendar days but less than or equal to 120 calendar days following completion of Requirement R1;</p> <p>OR</p> <p>The Transmission Owner had an unaffiliated third party verify the risk assessment performed under Requirement R1 and modified or documented the technical basis for not modifying its identification under Requirement R1 as required by part 2.3 but did so more than 80 calendar days from completion of the third party verification;</p> <p>OR</p> <p>The Transmission Owner had an unaffiliated third party verify the risk assessment performed under Requirement R1 but failed to modify or document the technical basis for not modifying its identification under R1 as required by part 2.3.</p>
Proposed Severe VSL	<p>The Transmission Owner had an unaffiliated third party verify the risk assessment performed under Requirement R1 but did so more than 120 calendar days following completion of Requirement R1;</p> <p>OR</p> <p>The Transmission Owner failed to have an unaffiliated third party</p>

VRF and VSL Justifications – CIP-014-1, R2	
	<p>verify the risk assessment performed under Requirement R1; OR The Transmission Owner had an unaffiliated third party verify the risk assessment performed under Requirement R1 but failed to implement procedures for protecting information per Part 2.4.</p>
<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>This guideline is not applicable because this is a new requirement.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is not binary. Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly or partially violated if an unaffiliated third party verification is not performed or if the verification is not performed within prescribe timelines. The VSLs are also written indicating violation of the Requirement Part regarding protection of information.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The language of the VSL directly mirrors the language in the corresponding requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based</p>	<p>The VSL is assigned for a single instance of failing to have an unaffiliated third party verification performed; or failing to perform the verification within prescribe timelines; or failing to implement procedures to protect information.</p>

VRF and VSL Justifications – CIP-014-1, R2

on A Single Violation, Not on A Cumulative Number of Violations	
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VRF and VSL Justifications – CIP-014-1, R3	
Proposed VRF	Lower
NERC VRF Discussion	Notifying the Transmission Operator that it has operational control of a Transmission station or Transmission substation identified in Requirement R1 and verified in Requirement R2 is necessary so that the Transmission Operator may begin performance of subsequent physical security requirements for the primary control center. This is a requirement that is administrative in nature and in a planning time frame that, if violated, would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system. This justifies a Lower VRF for this requirement.
FERC VRF G1 Discussion	<i>Guideline 1- Consistency w/ Blackout Report</i> This requirement does not address any of the critical areas identified in the Final Blackout Report.
FERC VRF G2 Discussion	<i>Guideline 2- Consistency within a Reliability Standard</i> The Requirement Parts for this Requirement provide additional detail regarding the notification of the Transmission Operator regarding the removal of a Transmission station or Transmission substation.
FERC VRF G3 Discussion	<i>Guideline 3- Consistency among Reliability Standards</i> The comparable INT-006-4 R6, which deals with notifying other entities so that Confirmed Interchange may be implemented, is assigned a Lower VRF.
FERC VRF G4 Discussion	<i>Guideline 4- Consistency with NERC Definitions of VRFs</i> See “NERC VRF Discussion” above.
FERC VRF G5 Discussion	<i>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</i> This guideline is not applicable, as the requirement does not co-mingle more than one obligation.
Proposed Lower VSL	The Transmission Owner notified the Transmission Operator that operates the primary control center as specified in Requirement R3 but did so more than seven calendar days and less than or equal to nine calendar days following the completion of Requirement R2; OR The Transmission Owner notified the Transmission Operator that operates the primary control center of the removal from the identification in Requirement R1 but did so more than seven calendar

VRF and VSL Justifications – CIP-014-1, R3	
	days and less than or equal to nine calendar days following the verification or the subsequent risk assessment.
Proposed Moderate VSL	<p>The Transmission Owner notified the Transmission Operator that operates the primary control center as specified in Requirement R3 but did so more than nine calendar days and less than or equal to 11 calendar days following the completion of Requirement R2;</p> <p>OR</p> <p>The Transmission Owner notified the Transmission Operator that operates the primary control center of the removal from the identification in Requirement R1 but did so more than nine calendar days and less than or equal to 11 calendar days following the verification or the subsequent risk assessment.</p>
Proposed High VSL	<p>The Transmission Owner notified the Transmission Operator that operates the primary control center as specified in Requirement R3 but did so more than 11 calendar days and less than or equal to 13 calendar days following the completion of Requirement R2;</p> <p>OR</p> <p>The Transmission Owner notified the Transmission Operator that operates the primary control center of the removal from the identification in Requirement R1 but did so more than 11 calendar days and less than or equal to 13 calendar days following the verification or the subsequent risk assessment.</p>
Proposed Severe VSL	<p>The Transmission Owner notified the Transmission Operator that operates the primary control center as specified in Requirement R3 but did so more than 13 calendar days following the completion of Requirement R2;</p> <p>OR</p> <p>The Transmission Owner failed to notify the Transmission Operator that it operates a control center identified in Requirement R1;</p> <p>OR</p> <p>The Transmission Owner notified the Transmission Operator that operates the primary control center of the removal from the identification in Requirement R1 but did so more than 13 calendar days following the verification or the subsequent risk assessment.</p> <p>OR</p> <p>The Transmission Owner failed to notify the Transmission Operator that operates the primary control center of the removal from the identification in Requirement R1.</p>

VRF and VSL Justifications – CIP-014-1, R3	
<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>This guideline is not applicable because this is a new requirement.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is not binary. Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly or partially violated if notification is not made subject to the conditions of the requirement.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The language of the VSL directly mirrors the language in the corresponding requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>The VSL is assigned for a single instance of failing to make the appropriate notification.</p>

VRF and VSL Justifications – CIP-014-1, R4	
Proposed VRF	Medium
NERC VRF Discussion	Performing an evaluation of potential threats and vulnerabilities of a physical attack to each of respective Transmission station(s), Transmission substation(s), and primary control center(s) is necessary to ensure the physical security of those assets as well as the reliability of the bulk power system. Since this Requirement is in a planning time frame, a violation could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly and adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system. However, violation of this requirement is unlikely, under emergency, abnormal, or restoration conditions anticipated by the preparations, to lead to bulk electric system instability, separation, or cascading failures, nor to hinder restoration to a normal condition. This justifies a Medium VRF for this requirement.
FERC VRF G1 Discussion	<i>Guideline 1- Consistency w/ Blackout Report</i> This requirement does not address any of the critical areas identified in the Final Blackout Report.
FERC VRF G2 Discussion	<i>Guideline 2- Consistency within a Reliability Standard</i> The Requirement Parts for this Requirement provide additional detail regarding the evaluation of potential threats and vulnerabilities of a physical attack to Transmission stations and/or Transmission substations.
FERC VRF G3 Discussion	<i>Guideline 3- Consistency among Reliability Standards</i> The comparable CIP-007-5 R2, which deals with a patch management process for tracking, evaluating, and installing cyber security patches for applicable Cyber Assets, is assigned a Medium VRF.
FERC VRF G4 Discussion	<i>Guideline 4- Consistency with NERC Definitions of VRFs</i> See “NERC VRF Discussion” above.
FERC VRF G5 Discussion	<i>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</i> This guideline is not applicable, as the requirement does not co-mingle more than one obligation.
Proposed Lower VSL	N/A

VRF and VSL Justifications – CIP-014-1, R4	
Proposed Moderate VSL	The Responsible Entity conducted an evaluation of the potential physical threats and vulnerabilities to each of its Transmission station(s), Transmission substation(s), and primary control center(s) identified in Requirement R1 but failed to consider one of Parts 4.1 through 4.3 in the evaluation.
Proposed High VSL	The Responsible Entity conducted an evaluation of the potential physical threats and vulnerabilities to each of its Transmission station(s), Transmission substation(s), and primary control center(s) identified in Requirement R1 but failed to consider two of Parts 4.1 through 4.3 in the evaluation.
Proposed Severe VSL	The Responsible Entity failed to conduct an evaluation of the potential physical threats and vulnerabilities to each of its Transmission station(s), Transmission substation(s), and primary control center(s) identified in Requirement R1; OR The Responsible Entity conducted an evaluation of the potential physical threats and vulnerabilities to each of its Transmission station(s), Transmission substation(s), and primary control center(s) identified in Requirement R1 but failed to consider Parts 4.1 through 4.3.
FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	This guideline is not applicable because this is a new requirement.
FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation	Guideline 2a: The VSL assignment is not binary. Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly or partially violated if a responsible entity fails to conduct an evaluation of the potential threats and vulnerabilities of a physical attack to each of their respective Transmission station(s), Transmission substation(s), and primary control center(s) or failed to consider any of the Requirement Parts 4.1-4.3.

VRF and VSL Justifications – CIP-014-1, R4	
Severity Level Assignments that Contain Ambiguous Language	
FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	The language of the VSL directly mirrors the language in the corresponding requirement.
FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	The VSL is assigned for a single instance of failing to conduct an evaluation of the potential threats and vulnerabilities of a physical attack to each of their respective Transmission station(s), Transmission substation(s), and primary control center(s) or failing to consider any of the Requirement Parts 4.1-4.3.

VRF and VSL Justifications – CIP-014-1, R5	
Proposed VRF	High
NERC VRF Discussion	Development, implementation and execution of a documented physical security plan(s) that covers applicable Transmission station(s), Transmission substation(s), and primary control center(s) is necessary to ensure the physical security of those assets as well as the reliability of the bulk power system. Since this Requirement is in a planning time frame, a violation could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly cause or contribute to bulk electric system instability, separation, or a cascading sequence of failures, or could place the bulk electric system at an unacceptable risk of instability, separation, or cascading failures, or could hinder restoration to a normal condition. This justifies a High VRF for this requirement.
FERC VRF G1 Discussion	<i>Guideline 1- Consistency w/ Blackout Report</i> This requirement does not address any of the critical areas identified in the Final Blackout Report.
FERC VRF G2 Discussion	<i>Guideline 2- Consistency within a Reliability Standard</i> The Requirement Parts for this Requirement provide additional detail regarding the physical security plan for applicable Transmission stations, Transmission substations, or primary control centers.
FERC VRF G3 Discussion	<i>Guideline 3- Consistency among Reliability Standards</i> The comparable CIP-003-3 R4, which deals with implementing and documenting a program to identify, classify, and protect information associated with Critical Cyber Assets, is assigned a High VRF.
FERC VRF G4 Discussion	<i>Guideline 4- Consistency with NERC Definitions of VRFs</i> See “NERC VRF Discussion” above.
FERC VRF G5 Discussion	<i>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</i> This guideline is not applicable, as the requirement does not co-mingle more than one obligation.
Proposed Lower VSL	The Responsible Entity developed and implemented a documented physical security plan(s) that covers each of its Transmission station(s), Transmission substation(s), and primary control center(s) identified in Requirement R1 but did so more than 120 calendar days but less than or equal to 130 calendar days after completing Requirement R2;

VRF and VSL Justifications – CIP-014-1, R5	
	<p>OR</p> <p>The Responsible Entity developed and implemented a documented physical security plan(s) that covers its Transmission station(s), Transmission substation(s), and primary control center(s) identified in Requirement R1 and verified according to Requirement R2 but failed to include one of Parts 5.1 through 5.4 in the plan.</p>
Proposed Moderate VSL	<p>The Responsible Entity developed and implemented a documented physical security plan(s) that covers each of its Transmission station(s), Transmission substation(s), and primary control center(s) identified in Requirement R1 but did so more than 130 calendar days but less than or equal to 140 calendar days after completing Requirement R2;</p> <p>OR</p> <p>The Responsible Entity developed and implemented a documented physical security plan(s) that covers its Transmission station(s), Transmission substation(s), and primary control center(s) identified in Requirement R1 and verified according to Requirement R2 but failed to include two of Parts 5.1 through 5.4 in the plan.</p>
Proposed High VSL	<p>The Responsible Entity developed and implemented a documented physical security plan(s) that covers each of its Transmission station(s), Transmission substation(s), and primary control center(s) identified in Requirement R1 but did so more than 140 calendar days but less than or equal to 150 calendar days after completing Requirement R2;</p> <p>OR</p> <p>The Responsible Entity developed and implemented a documented physical security plan(s) that covers its Transmission station(s), Transmission substation(s), and primary control center(s) identified in Requirement R1 and verified according to Requirement R2 but failed to include three of Parts 5.1 through 5.4 in the plan.</p>
Proposed Severe VSL	<p>The Responsible Entity developed and implemented a documented physical security plan(s) that covers each of its Transmission station(s), Transmission substation(s), and primary control center(s) identified in Requirement R1 but did so more than 150 calendar days after completing the verification in Requirement R2;</p> <p>OR</p> <p>The Responsible Entity failed to develop and implement a documented physical security plan(s) that covers its Transmission</p>

VRF and VSL Justifications – CIP-014-1, R5	
	<p>station(s), Transmission substation(s), and primary control center(s) identified in Requirement R1.</p> <p>OR</p> <p>The Responsible Entity developed and implemented a documented physical security plan(s) that covers its Transmission station(s), Transmission substation(s), and primary control center(s) identified in Requirement R1 and verified according to Requirement R2 but failed to include Parts 5.1 through 5.4 in the plan.</p>
<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>This guideline is not applicable because this is a new requirement.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is not binary.</p> <p>Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly or partially violated if a responsible entity fails to develop and implement a documented physical security plan(s) that covers their respective Transmission station(s), Transmission substation(s), and primary control center(s) or if the responsible entity failed to include any of the Requirement Parts 5.1-5.4.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The language of the VSL directly mirrors the language in the corresponding requirement.</p>
<p>FERC VSL G4 Violation Severity Level</p>	<p>The VSL is assigned for a single instance of failing to develop and implement a documented physical security plan(s) that covers their respective Transmission station(s), Transmission substation(s), and</p>

VRF and VSL Justifications – CIP-014-1, R5

Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations

primary control center(s) or failing to include any of the Requirement Parts 5.1-5.4.

VRF and VSL Justifications – CIP-014-1, R6	
Proposed VRF	Medium
NERC VRF Discussion	Unaffiliated third party review of the threat evaluation performed under Requirement R4 and the security plan(s) developed under Requirement R5 provides reinforcement that these requirements were performed with due consideration to risk to the bulk power system. Since this Requirement is in a planning time frame, a violation could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly and adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system. However, violation of this requirement is unlikely, under emergency, abnormal, or restoration conditions anticipated by the preparations, to lead to bulk electric system instability, separation, or cascading failures, nor to hinder restoration to a normal condition. This justifies a Medium VRF for this requirement.
FERC VRF G1 Discussion	<i>Guideline 1- Consistency w/ Blackout Report</i> This requirement does not address any of the critical areas identified in the Final Blackout Report.
FERC VRF G2 Discussion	<i>Guideline 2- Consistency within a Reliability Standard</i> The Requirement Parts for this Requirement provide additional detail regarding the unaffiliated third party review including entities that may perform the review, timelines for completing the review and provisions for confidentiality of sensitive information.
FERC VRF G3 Discussion	<i>Guideline 3- Consistency among Reliability Standards</i> The comparable EOP-005-2 R6, which deals with verifying that its restoration plan accomplishes its intended function is assigned a medium VRF.
FERC VRF G4 Discussion	<i>Guideline 4- Consistency with NERC Definitions of VRFs</i> See “NERC VRF Discussion” above.
FERC VRF G5 Discussion	<i>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</i> This guideline is not applicable, as the requirement does not co-mingle more than one obligation.
Proposed Lower VSL	The Responsible Entity had an unaffiliated third party review the evaluation performed under Requirement R4 and the security plan(s) developed under Requirement R5 but did so in more than 90 calendar days but less than or equal to 100 calendar days;

VRF and VSL Justifications – CIP-014-1, R6	
	<p>OR</p> <p>The Responsible Entity had an unaffiliated third party review the evaluation performed under Requirement R4 and the security plan(s) developed under Requirement R5 and modified or documented the reason for not modifying the security plan(s) as specified in Part 6.3 but did so more than 60 calendar days and less than or equal to 70 calendar days following completion of the third party review.</p>
Proposed Moderate VSL	<p>The Responsible Entity had an unaffiliated third party review the evaluation performed under Requirement R4 and the security plan(s) developed under Requirement R5 but did so in more than 100 calendar days but less than or equal to 110 calendar days;</p> <p>OR</p> <p>The Responsible Entity had an unaffiliated third party review the evaluation performed under Requirement R4 and the security plan(s) developed under Requirement R5 and modified or documented the reason for not modifying the security plan(s) as specified in Part 6.3 but did so more than 70 calendar days and less than or equal to 80 calendar days following completion of the third party review.</p>
Proposed High VSL	<p>The Responsible Entity had an unaffiliated third party review the evaluation performed under Requirement R4 and the security plan(s) developed under Requirement R5 but did so more than 110 calendar days but less than or equal to 120 calendar days;</p> <p>OR</p> <p>The Responsible Entity had an unaffiliated third party review the evaluation performed under Requirement R4 and the security plan(s) developed under Requirement R5 and modified or documented the reason for not modifying the security plan(s) as specified in Part 6.3 but did so more than 80 calendar days following completion of the third party review;</p> <p>OR</p> <p>The Responsible Entity had an unaffiliated third party review the evaluation performed under Requirement R4 and the security plan(s) developed under Requirement R5 but did not and modify or document the reason for not modifying the security plan(s) as specified in Part 6.3.</p>
Proposed Severe VSL	<p>The Responsible Entity failed to have an unaffiliated third party</p>

VRF and VSL Justifications – CIP-014-1, R6	
	<p>review the evaluation performed under Requirement R4 and the security plan(s) developed under Requirement R5 in more than 120 calendar days;</p> <p>OR</p> <p>The Responsible Entity failed to have an unaffiliated third party review the evaluation performed under Requirement R4 and the security plan(s) developed under Requirement R5;</p> <p>OR</p> <p>The Responsible Entity had an unaffiliated third party review the evaluation performed under Requirement R4 and the security plan(s) developed under Requirement R5 but failed to implement procedures for protecting information per Part 6.43.</p>
<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>This guideline is not applicable because this is a new requirement.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is not binary.</p> <p>Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly or partially violated if an unaffiliated third party review is not performed or if the review is not performed within prescribe timelines. The VSLs are also written indicating violation of the Requirement Part regarding protection of information.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the</p>	<p>The language of the VSL directly mirrors the language in the corresponding requirement.</p>

VRF and VSL Justifications – CIP-014-1, R6

VRF and VSL Justifications – CIP-014-1, R6	
Corresponding Requirement	
FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	The VSL is assigned for a single instance of failing to have an unaffiliated third party review performed; or failing to perform the review within prescribe timelines; or failing to implement procedures to protect information.