

Summary of Changes

Project 2023-04 Modifications to CIP-003 Reliability Standard CIP-003-11 and CIP-003-12

Background

Two drafting teams (2016-02 and 2023-04) were simultaneously working on modifications to CIP-003-9, the approved version of CIP-003 that included the low impact supply chain revisions.

- Project 2016-02 adding virtualization and other conforming changes to CIP-003-9.
- Project 2023-04 adding the recommendations from the Low Impact Criteria Review Team (LICRT) report.

Project 2016-02's work passed final ballot and was approved by the NERC Board in May, 2024 and became CIP-003-10 while Project 2023-04 was still in progress and became CIP-003-11. However, both were still based on the CIP-003-9 version.

Project 2023-04 is therefore also producing CIP-003-12, which is for illustrative purposes to show a combination of the -10 and -11 versions into one. In summary:

- Project 2016-02 changed -9 to create -10
- Project 2023-04 changed -9 to make -11
- Project 2023-04 has combined -10 and -11 to create -12

Project 2023-04 is posting both versions of CIP-003-11 and CIP-003-12 as well as corresponding Implementation Plans. As Project 2016-02's work is part of a large package consisting of changes to eleven CIP standards plus new and modified glossary terms and Project 2023-04 is making few changes to one section of Attachment 1 within CIP-003 only, it is unknown the speed or order in which these two versions of CIP-003 may achieve final regulatory approval in the future.

The two versions are being maintained and posted by Project 2023-04 such that either one can go forward based on the future approval timelines.

Summary of Changes in CIP-003-12

CIP-003-12 is the combination of Project 2023-04's changes in Attachment 1 on top of Project 2016-02's changes for virtualization. The conforming modifications that Project 2023-04 has made to Section 3 of Attachment 1 are:

- *The inclusion of Shared Cyber Infrastructure (SCI)*. As SCI is the underlying infrastructure of virtualized environments on which low impact BES Cyber Systems (BCS) may reside, changes have been made to add SCI as an option for both the origin and target of the access defined

and the controls required in CIP-003. Thus references to low impact BCS now include the phrase “or SCI that supports a low impact BCS”.

- *References to “Cyber Asset” have been changed to “Cyber System”.* As Project 2016-02 defined new glossary terms for Virtual Cyber Assets (VCA) as well as SCI, that project also created “Cyber System” as a term to include all three forms of Cyber Asset, VCA, or SCI into one term.
- *Use of acronyms.* As the NERC Glossary of Terms includes official acronyms for many terms, conforming changes have been made from Project 2016-02’s work of replacement of full terms (after first use in a standard) with its acronym as defined in the glossary, such as BCS in place of “BES Cyber System”.

Key for Change Identifiers in CIP-003-12

The following key describes the origin of changes in CIP-003-12:

<u>Redline Text</u>	Project 2023-04 original changes
Text	Project 2016-02 changes
Text	Project 2023-04 conforming changes to align with 2016-02 changes

Implementation Plans

Along with the CIP-003-11 implementation plan, which is substantially similar to the implementation plan that was previously posted by the Project 2023-04 drafting team, the drafting team is also publishing a separate CIP-003-12 implementation plan. The CIP-003-12 implementation plan is associated with a version of CIP-003 that combines the revisions in CIP-003-10 with the revisions in CIP-003-11. As a result, it combines elements of the CIP-003-10 and CIP-003-11 implementation plans to help ensure that the timelines associated with the revisions in each version are maintained while providing governing authorities an option to approve only the revisions in CIP-003-11 or a standard combining revisions from both CIP-003-10 and CIP-003-11 (e.g., CIP-003-12).

The CIP-003-12 implementation plan would preserve the early adoption provisions that are contained in the CIP-003-10 implementation plan. Thus, it would continue to allow those entities that wish to take advantage of the virtualization changes earlier than that implementation plan’s two year implementation timeframe for the CIP-003-10 changes. The early adoption provisions do not apply to the revisions contained in CIP-003-11. The CIP-003-12 implementation does not affect the implementation plan of any other Reliability Standard that was addressed by Project 2016-02.

In addition, the CIP-003-12 implementation plan proposes that the standard shall become effective on the first day of the first calendar quarter that is the later of: (1) thirty-six (36) months after the effective date of the applicable governmental authority’s order approving Reliability Standard CIP-

003-11; or (2) twenty-four (24) months after the effective date of the applicable governmental authority's order approving Reliability Standard CIP-003-12, or as otherwise provided for by the applicable governmental authority. This proposal would allow entities to have, at a minimum, the 24 months that was established by Project 2016-02 for the CIP-003-10 revisions. Likewise, entities would be allowed, at least, the 36 months to comply with the CIP-003-11 changes, as previously proposed by the Project 2023-04 drafting team.