

Implementation Plan

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

Applicable Standard(s)

- CIP-003-12 – Cyber Security – Security Management Controls

Requested Retirement(s)

- CIP-003-11 – Cyber Security – Security Management Controls

Prerequisite Standard(s)

These standard(s) or definitions must be approved before the Applicable Standard becomes effective:

- CIP-003-11 – Cyber Security – Security Management Controls

Applicable Entities

- Balancing Authority
- Distribution Provider
- Generator Operator
- Generator Owner
- Reliability Coordinator
- Transmission Operator
- Transmission Owner

New/Modified/Retired Terms in the NERC Glossary of Terms

- None

Background

Project 2016-02 proposed revisions to the suite of CIP standards, including the development of CIP-003-10, to incorporate virtualization. On May 9, 2024, the NERC Board of Trustees approved Reliability Standard CIP-003-10 and the retirement of Reliability Standard CIP-003-9, which was scheduled to take effect on April 1, 2026.

Project 2023-04 addresses modifications to CIP-003 in response to recommendations from the Low Impact Criteria Review Team (LICRT), which was formed by the NERC Board of Trustees to consider

the potential threat and risk posed by a coordinated cyber-attack on low impact Bulk Electric System (BES) Cyber Systems. In its report, the LICRT documented the results of the review and analysis of degrees of risk presented by various facilities that meet the criteria that define low impact cyber facilities and recommended actions to address those risks. The NERC Board of Trustees accepted the LICRT's report at its November 2022 meeting and asked that the recommendations in the report be initiated. The Standards Committee accepted the standard authorization request (SAR) at its March 22, 2023 meeting. In response to the SAR, Project 2023-04 proposes merging Sections 3 and 6 of CIP-003-9, Attachment 1 and 2 to consolidate all electronic access requirements. The Project 2023-04 revisions were captured in Reliability Standard CIP-003-11.

Reliability Standard CIP-003-12 combines the changes proposed in CIP-003-10 and CIP-003-11 into a single CIP-003 Reliability Standard. It does not include any new revisions to CIP-003 beyond combining the two versions. Creating a single combined CIP-003 standard that reflects the work the Project 2016-02 and Project 2023-04 drafting teams is prudent because the projects overlapped in development, resulting in competing versions of CIP-003. Likewise, the required implementation plans for both versions should be aligned in a manner that preserves the intent of the respective drafting teams.

General Considerations

This implementation plan takes into account the overlapping implementation timelines for CIP-003-10 and CIP-003-11, which are combined into one implementation plan as discussed herein for Reliability Standard CIP-003-12. This implementation plan does not change or modify the early adoption provisions set forth in the implementation plan for CIP-003-10, nor does it change or modify the implementation plan set forth by Project 2016-02 for any other CIP Reliability Standard.

Early Adoption

With respect to the early adoption provisions set forth in the implementation plan for CIP-003-10, those provisions are hereby incorporated by reference into this implementation plan and will only apply to the CIP-003-10 revisions. The early adoption provisions, incorporated herein, will not apply to the revised language in CIP-003-11.

Effective Date

Reliability Standard CIP-003-12

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 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.

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 the later of: (1) thirty-six (36) months after the date Reliability Standard CIP-003-11 is adopted by the NERC Board of Trustees; or (2) twenty-four (24) months after the date Reliability Standard CIP-003-12 is adopted by the NERC Board of Trustees, or as otherwise provided for in that jurisdiction.

Initial Performance of Periodic Requirements

Periodic requirements contain time parameters for subsequent and recurring iterations of the requirement, such as, but not limited to, “. . . at least once every 15 calendar months . . .”, and Responsible Entities shall comply initially with those periodic requirements in CIP-003-12 as follows:

Responsible Entities shall initially comply with Requirement R1, Part 1.2.3 on or before the effective date of CIP-003-12. Responsible Entities shall initially comply with all other periodic requirements in CIP-003-12 within the periodic timeframes of their last performance under the version of the CIP-003 Reliability Standard then in effect.

Retirement Date Reliability Standard CIP-003

The currently effective version of Reliability Standard CIP-003 shall be retired immediately prior to the effective date of CIP-003-12 in the jurisdiction in which the revised standard is becoming effective.