CIP-014
PHYSICAL SECURITY
What we know so far
DISCLAIMER

Please keep in mind that many of the issues surrounding CIP-014 are still under discussion with NERC, the Regions and Industry. All are attempting to get finalized answers and guidance by April 1.
R1, R2, R3 address the technical aspects of identifying critical Transmission stations and Transmission substation(s) that if rendered inoperable could result in instability, uncontrolled separation or cascading within an interconnection.
Applicability Section

If an entity answers NO to 4.1 and the sub bullets, they need to go NO FURTHER with CIP-014 as it does not apply to them.
R1

Addresses the initial Risk Assessment

Which stations could cause:

• Instability
• uncontrolled separation
• cascading within an interconnection
R1.1

Subsequent Risk Assessments must be conducted:
For previously identified stations- at least every 30 Calendar months
At least every 60 calendar months for any TO that had not previously identified an stations.
Both circumstances are “as verified according to Requirement R2.”
R1.2

The TO shall identify the primary control center that operationally controls each Transmission station and Transmission substation identified in the R1 risk assessment.
R2-Unaffiliated 3rd Party verification

2.1-The unaffiliated 3rd party has to be:

- PC
- TP
- RC

Or an entity that has transmission planning or analysis experience
R2.2- Third party verification

The unaffiliated 3\textsuperscript{rd} party shall either verify the risk assessment or recommend the addition or deletion of Transmission stations or Transmission substations. The verification must be completed within \textbf{90 days} of completion of R1

\textbf{WHEN DOES MY CLOCK START?}
R2.3-Additions or Deletions

If the 3rd party recommends addition or deletions of any stations identified in R1 the TO shall do one of the following within 60 calendar days of completion of the verification:

• Modify it’s identifications consistent with the 3rd party recommendations
  Or
• Document the technical basis for not doing so
R2.4 Non-Disclosure Agreements

Each TO shall implement procedures, such as NDAs for protecting sensitive or confidential information exchanged with the unaffiliated verifying entity.

This is pretty self explanatory; Protect your information!!
R3-Notifications

For a primary control center not under their operational control the TO shall notify within 7 days the TO that **DOES HAVE** operational control of that primary control center that it has been identified under R1 and verified under R2 and the completion date of R2.

R3.1- If a station has been removed, they shall notify the TO that has operational control within 7 days that it has been removed.
R4-Threats and Vulnerabilities

For Transmission stations, Transmission substations identified in R1 and Verified in R2 a threat and vulnerability evaluation must be conducted taking into consideration the following:

• Unique characteristics (ex. urban or rural area)
• Prior history of attack on similar facilities, the frequency of such attacks, geographic proximity and severity of past physical security related events.
• Intelligence or threat warnings from various sources.
R5-Security Plans

Within 120 days after identification under R1 and verification under R2 you must develop and implement a documented Security Plan. The plan must include:

5.1-Resiliency or security measures designed to deter, delay, assess, communicate and respond to potential threats and vulnerabilities as identified in R4
R5 Continued

R5.2-Plan must include Law Enforcement contact and coordination information

R5.3-Plan must include a timeline for implementation of the plan and the security enhancements and modifications specified in the plan.

R5.4-Include provisions to evaluate evolving threats and corresponding security measures.
R6-Unaffiliated Third Party Review

Each TO shall have an unaffiliated third party review the evaluation completed under R4 and the security plans developed under R5. The review may occur concurrently with or after the completion of R4 and the development of the plan under R5.
R6.1

Each TO shall select an unaffiliated third party reviewer from the following:

6.1.1- Entity or organization whose review staff holds a CPP or PSP certification (ASIS)
6.1.2- An entity or organization approved by the ERO (NERC)
6.1.3- A governmental agency with Physical Security Experience (DHS, Fusion Center, etc)
6.1.4- Entity or organization with demonstrated law enforcement, govt or military physical security expertise.
R6.2 and R6.3-Third Party Review and Recommendations

R6.2-Third party review must be completed within 90 calendar days and may include recommendations of changes to the evaluation under R4 or the Plan developed under R5.

R6.3-If changes or recommendations are made by the third party reviewer, within 60 days the To or TOP must:

Modify consistent with the recommendations

Or

Document the reason for not doing so
R6.4-Protection of Information

Implement procedures such as NDAs to protect sensitive or confidential information exchanged with the unaffiliated third party reviewer of the evaluation and plan.

The same as R2.4

PROTECT YOUR EVALUATIONS AND SECURITY PLANS!!
QUESTIONS?