



**TEXAS
REGIONAL
ENTITY™**

An Independent Division of ERCOT

Technical Feasibility Exception Request Form Part A: Portal Training

Learn how to submit TFE requests for your organization
on the secure Texas Regional Entity Portal.

portal.texasre.org

To submit a request for a TFE, your organization must have the following roles set
up in your Master Account:

- (1) Master Account Administrator and/or TFE Contributor (to submit data)
- (2) Authorized Signatory (to certify data)

October 2009

Technical Feasibility Exceptions -- Applicable CIP Requirements

- **Technical Feasibility Exceptions apply only to specific requirements in NERC Critical Infrastructure Protection (CIP) Reliability Standards: CIP-002 through CIP-009**
- **Below are requirements eligible for TFE Request:**
 - CIP-005-1/R2.4
 - CIP-005-1/R2.6
 - CIP-005-1/R3.1
 - CIP-005-1/R3.2
 - CIP-007-1/R2.3
 - CIP-007-1/R4
 - CIP-007-1/R5.3
 - CIP-007-1/R5.3.1
 - CIP-007-1/R5.3.2
 - CIP-007-1/R5.3.3
 - CIP-007-1/R6.
 - CIP-007-1/R6.3.

Your Portal Account

Portal Home | TexasRE.org

PORTAL

Texas Regional Entity

Logged in as: **John Doe** | Log Out

System Administration

- Add New Contact
- Search Contacts
- My Company
- My Contacts

Compliance

- File Upload

Announcements

Welcome to the Texas Regional Entity Portal 12/31/2008

The Texas Regional Entity Portal is the vehicle through which many aspects of the NERC Compliance Monitoring and Enforcement Program and NERC registrations are conducted. The portal allows improved administration, increased security, and simpler tracking.

Compliance Summary

Form Name	Due Date
EOP-009-0 Self Certification	12/5/2008

Log into the Texas Regional Entity Portal: <https://portal.texasre.org>.

(If you do not know your username, contact your **Master Account Administrator (MAA)** to obtain your username. Then click “I forgot my password” at the login page to have a temporary password emailed to you.)

1. Your contact name displays. **Security Reminder: Do not share usernames or accounts.**
2. Your organization’s Master Account name also displays.

If you have access to more than one organization’s Master Account, you will see a drop-down menu at the top. If you have access to multiple Master Accounts, when filling out compliance forms, you must first use the drop-down menu to select the correct organization.

Requesting Technical Feasibility Exceptions via the Portal

- **Technical Feasibility Exception (TFE) Request Part A Form on the portal may be used by entity to send a request to Texas RE.**
- **The form assumes that the user has read NERC's Rules of Procedure Appendix 4D – Technical Feasibility Exception:**
<http://www.nerc.com/page.php?cid=1|8|169>

TFE Roles Assigned in the Portal

- Your organization's Master Account Administrator will assign roles to users responsible for completing the TFE request:**
- **TFE Contributor – may fill out the form**
 - **TFE Viewer – may view the form but not edit**

An Authorized Signatory will be required to electronically sign the Certification Statement.

Locate TFE Request Forms

Portal Home | TexasRE.org

PORTAL

TestCo Energy

Logged in as: Clark Kent ▶ Log Out	Announcements	Email Questions
▶ System Administration ▶ Compliance ▼ TFE Request Add New Under Review	Welcome to the Texas Regional Entity Portal The Texas Regional Entity Portal is the vehicle through which many aspects of the NERC Compliance Monitoring and Enforcement Program and NERC registrations are conducted. The portal allows improved administration, increased security, and simpler tracking. Under: Please keep the portal secure. Each user must have an individual portal account. Do not share your account or password with others.	▶ Support ▶ NERC Registration ▶ Mitigation Plan ▶ Cyber Security

To create or locate TFE request forms, select **TFE Request**.

Select **Add New** to create a new request.

TFE Request Form Due Date

- When the TFE request form is created by the entity, it is due in 14 days.
- If the form cannot be completed immediately, the form may be saved. Return to the form by selecting TFE Request and Incomplete.

Technical Feasibility Exception Request - Part A - 2009

Save Item | Delete Item | Cancel Changes | Save PDF | Return To Search Results

*Required Fields Status: Saved

CONFIDENTIAL
Applicable to NERC Reliability Standards CIP-002-1 through CIP-009-1

Complete and submit the following information:

Responsible Entity Name: TestCo Energy

Responsible Entity NERC Compliance Registry ID:

Is this an amended TFE Request? No

Technical Contact

* Find | Clear | New Contact

This submittal contains information related to cyber security protection and/or actual or potential cyber security incident(s) and therefore is marked as "Contains Critical Energy Infrastructure Information - Do Not Release." CEII is information concerning proposed or existing critical infrastructure (physical or virtual) information that: (1) is exempt from disclosure under FOIA, (2) relates to the production, generation, transportation, transmission or distribution of energy, (3) could be useful to a person planning an attack on the infrastructure, and (4) does not simply give the location of the critical infrastructure. Texas Regional Entity will disclose this information to NERC and other third parties, only as required, and in accordance with established procedures pursuant to section 1500 of the NERC rules of procedure.

Form Overview

Provide the following information:

- Technical contact
- Applicable CIP standard and requirement
- Number of covered assets


Technical Contact

* Clark Kent (ckent@dailyplanet.com)

 Find |  Clear |  New Contact

This submittal contains information related to cyber security protection and/or actual or potential cyber security incident(s) and therefore is marked as "Contains Critical Energy Infrastructure Information - Do Not Release." CEII is information concerning proposed or existing critical infrastructure (physical or virtual) information that: (1) is exempt from disclosure under FOIA, (2) relates to the production, generation, transportation, transmission or distribution of energy, (3) could be useful to a person planning an attack on the infrastructure, and (4) does not simply give the location of the critical infrastructure. Texas Regional Entity will disclose this information to NERC and other third parties, only as required, and in accordance with established procedures pursuant to section 1500 of the NERC rules of procedure.

Applicable Requirement for which the TFE is being requested:

* Select a Select One... 

Number of Covered (Cyber) Asset(s) for which the TFE is being requested:

*

Form Overview (continued) – TFE Request Filings with Multiple Regions

- If applicable, TFE request forms must be filed separately with each of the Regional Entities; the Regional Entities will coordinate.
- Please indicate on the form if your organization will submit similar requests in other regions.

Is a similar TFE Request being filed with other regions?									
*	<input type="radio"/> Yes	<input type="radio"/> No							
If yes, which regions will this TFE (with different Covered Assets) be submitted to?									
<input type="checkbox"/>	FRCC	<input type="checkbox"/>	NERC	<input type="checkbox"/>	RFC	<input type="checkbox"/>	SPP RE	<input type="checkbox"/>	WECC
<input type="checkbox"/>	MRO	<input type="checkbox"/>	NPCC	<input type="checkbox"/>	SERC	<input type="checkbox"/>	Texas RE		

- The TFE request your organization submits to Texas RE only applies to covered assets within the ERCOT region.

Form Overview (continued) – Equipment, Process, or Procedure

Provide the type of equipment, process, or procedure at or associated with the covered assets and subject to or required by the CIP standard and requirement.

For which type(s) of equipment, process, or procedure at or associated with the Covered Asset(s) and subject to or required by the Applicable Requirement is the TFE requested? If relying upon a NERC Class-Type TFE, select "Class-Type TFE" and enter the Class-Type TFE Identifier below:

* Data storage device

Digital Protective Control Device

Electronic access control system

Electronic access monitoring system

If Other, please briefly describe or if Class-Type TFE, enter the NERC Class-Type TFE Identifier:

Form Overview (continued) – Equipment, Process, or Procedure Selections on Form

- **Data storage device**
- **Digital protective control device**
- **Electronic access control system**
- **Electronic access monitoring system**
- **Industrial/process control system**
- **Mainframe computer**
- **Network/data communications device**
- **PC/laptop**
- **Peripheral device (e.g., printer)**
- **Physical access control system**
- **Physical access monitoring system**
- **Physical security perimeter**
- **Relay**
- **RTU**
- **Server**
- **Telecommunications device**
- **Transmitters**
- **Valve controllers**
- **Class-Type TFE**
- **Other**

Form Overview (continued) – Basis and Justification

Provide the basis for the TFE request.

What is the basis for the TFE Request?

*

- Not technically possible
- Operationally infeasible
- Precluded by technical limitations
- Adverse effect on BES (bulk electric system) reliability
- Cannot achieve by compliance date
- Unacceptable safety risks
- Conflicts with other statutory or regulatory requirement
- Excessive cost exceeds reliability benefit

Provide description and justification.

Provide a brief statement describing and justifying why the Responsible Entity cannot achieve Strict Compliance with the Applicable Requirement:

*

Form Overview (continued) – Impact and Mitigation

- Provide the estimated impact on reliable operation of the BES.
- Provide a summary of compensating and/or mitigating measures.

What is the estimated impact on reliable operation of the Bulk Electric System of the Responsible Entity if the compensating and mitigating measures for the covered asset(s) are not sufficient and cyber security is compromised?

*

Provide a brief summary of the compensating and/or mitigating measures that are planned or have been implemented:

*

Have the compensating and/or mitigating measures been fully implemented?

* Yes No

If Yes, what was the actual completion date for implementing all necessary compensating and/or mitigating measures?

If No, what is the proposed date for implementing all necessary compensating and/or mitigating measures?

Form Overview (continued) – Time Schedule

Provide proposed plan and time schedule for terminating the TFE; or explain why open-ended TFE is requested.

Is there a proposed plan and time schedule for terminating the TFE and achieving Strict Compliance with the Applicable Requirement?

* Yes No

If Yes, what is the proposed Expiration Date?

And, what is the plan for terminating the TFE?

Provide a brief explanation for "Other":

If No, explain why an open-ended TFE is requested:

Form Overview (continued) – Plan for Terminating TFE – Selections on Form

- **Replace equipment/process/location**
- **Upgrade equipment/process/location**
- **Eliminate the need for equipment/process/location**
- **Research means to reach strict compliance**
- **Design means to reach strict compliance**
- **Test means to reach strict compliance**
- **Other**


Form Overview (continued) – National Security Standards

Notify Texas RE whether request is supported by national security standards.

Is this TFE Request supported, in whole or in part, by Classified National Security Information, NRC Safeguards Information, or Protected FOIA Information?

* Yes No

Completion of the Form



Does the Responsible Entity understand and agree to the requirement to submit timely periodic and other reports as specified in the approved TFE? The reports that the Responsible Entity may be required to submit following approval of the TFE request to the applicable Regional Entity include: (i) reports on the Responsible Entity's progress in implementing and maintaining the compensating measures and/or mitigating measures the Responsible Entity is adopting pursuant to the approved TFE; (ii) reports on the Responsible Entity's progress in implementing steps and/or conducting research and/or analysis to achieve Strict Compliance with the Applicable Requirement; and (iii) reports supporting the continued justification for the approved TFE.

A certification statement, electronically signed by the Authorized Signatory, asserting that the Senior Manager or Delegate has read the TFE Request and approved the compensating measures and/or mitigating measures and the implementation plan, and on behalf of the Responsible Entity that the Responsible Entity believes approval of the TFE Request is warranted pursuant to the criteria specified in the Part A Instructions.

Check the box indicating that the entity understands and agrees to TFE requirements.

Additional Comments:

[Return to top](#)

Ready to Create Certification Statement

 [Save Item](#) | [Delete Item](#) | [Cancel Changes](#) | [Save PDF](#) | [Revert](#)

Once a form is complete, check the **Ready for Authorized Signatory Approval** box at the bottom of the form.

Click **Save Item**.

All required fields must be filled out.

Important: Once you select "Ready for Authorized Signatory Approval," and save, only an MAA can unlock the form (by unclicking the checkbox). Make sure that you have correctly filled out the form before indicating that it is ready for signature.

Locate Form for Certification Statement

Once your form (or forms) is marked “Ready for Authorized Signatory Approval,” the form must be added to a Certification Statement.

Important: Your form is not submitted until a Certification Statement has been submitted.

Locate the form(s) by going to **TFE Request, Incomplete.**

Logged in as: **Clark Kent**
Log Out

- System Administration
- Compliance
- TFE Request
 - Add New
 - Incomplete
 - Under Review

TFE Requests - Incomplete - Search Results

Export List | Create Certification Statement RPP: 500

Search Results for Incomplete Records

Unique ID	Standard/Requirement	Due Date	Ready for Approval	Submittal Status
View	CIP-005-1 R2.4.	10/26/2009	1/1	<input type="checkbox"/>

Viewing 1 to 1 of 1 Records.

= Past Due = Due Date Approaching = Ready For Certification Statement = Received by Texas Regional Entity

Understand the Search Results – Certification Statements

The **Certification Statement** column shows the status of certification:

1. An empty field indicates the form has **not** been marked as “Ready for Authorized Signatory Approval” or submitted to Texas RE.
2. A form marked as “Ready for Authorized Signatory Approval” has a checkbox. **This form must be selected by a Contributor to add to a Certification Statement**, to be signed by the Authorized Signatory before the due date.
3. A date indicates that the form has been included on a Certification Statement. **The Certification Statement still needs to be submitted by the Authorized Signatory, before the due date.**
4. Only a date highlighted in green indicates that the Certification Statement been submitted to Texas RE.

Logged in as: **Clark Kent**
Log Out

System Administration
Compliance
TFE Request
Add New
Incomplete
Under Review

TFE Requests - Incomplete - Search Results

Export List | Create Certification Statement RPP: 500

Search Results for Incomplete Records

Unique ID	Standard/Requirement	Due Date	Ready for Approval	Submittal Status
View	CIP-005-1 R2.4.	10/26/2009	2	<input type="checkbox"/>

Viewing 1 to 1 of 1 Records.

Legend:
Red = Past Due
Yellow = Due Date Approaching
White = Ready For Certification Statement
Green = Received by Texas Regional Entity

Certification Statement - Prepare for Authorized Signatory Approval

Under the **Certification Statement** column, click the box for each form that you would like to select for a Certification Statement. More than one form may be included under one Compliance Certification Statement.

Once all of the boxes are checked, click **Create Certification Statement**.

Once you have clicked View Certification Statement, you will be asked whether you are sure that you want to run a Certification Statement on those forms: Click **OK**.

The screenshot displays a web application interface for TFE Requests. On the left is a navigation menu with options like 'System Administration', 'Compliance', and 'TFE Request'. The main area shows a table titled 'TFE Requests - Incomplete - Search Results'. The table has columns for 'Unique ID', 'Standard/Requirement', 'Due Date', 'Ready for Approval', and 'Submittal Status'. A single record is shown with 'CIP-005-1 R2.4' as the requirement and '10/26/2009' as the due date. A green arrow points to the 'Create Certification Statement' button in the top toolbar, and another green arrow points to the checkbox in the 'Ready for Approval' column. Below the table, a legend indicates that a white checkbox represents 'Ready For Certification Statement' and a green checkbox represents 'Received by Texas Regional Entity'. A 'Windows Internet Explorer' dialog box is overlaid on the bottom left, asking 'Are you sure you want to run a Certification Statement on these rows?' with 'OK' and 'Cancel' buttons.

Unique ID	Standard/Requirement	Due Date	Ready for Approval	Submittal Status
View	CIP-005-1 R2.4.	10/26/2009	<input type="checkbox"/>	

Certification Statement - Prepare for Authorized Signatory Approval (cont.)

Portal Home | TexasRE.org ?

PORTAL

TestCo Energy

Logged in as:
Clark Kent
▶ Log Out

▶ System Administration
▶ Compliance
▼ TFE Req

Add New
Incomplete
Under Review

Edit Certification Statement

Save PDF | Notify Authorized Signatory

*Required Fields **Status: New**

*Select Authorized Signatory: Lois Lane

Form Name	Form Title	Functions	Compliance	Due Date	Ready for Approval Date	Filing Period
Technical					10/12/2009	2009

1. Select the **Authorized Signatory**. If your Authorized Signatory contact does not appear in the list, contact your MAA to assign the appropriate user an “Authorized Signatory” role.
2. Then, click **Notify Authorized Signatory**.

Note: If you are both a Contributor and the Authorized Signatory, the “Notify Authorized Signatory” link will be replaced with **Submit Certification Statement**.

Submit the Certification Statement

- Again, you must be assigned the **Authorized Signatory** role to submit the Certification Statement.
- An Authorized Entity Officer (AEO) must have been given the Authorized Signatory role in order to submit the Certification Statement.
- There may be more than one Authorized Signatory for an organization. The Authorized Signatory for a form does not have to be the AEO.
- Authorized Signatories see only the Certification Statements they have been assigned.

Certification Statement – Authorized Signatory Approval

If you are the Authorized Signatory, you may locate the Certification Statement either by (a) clicking the link that is e-mailed to you (portal login required), or (b) logging into the portal and choosing **Pending Certification Statements** under the Compliance menu (preferred method).

Portal URL: <https://portal.texasre.org>

1. To review the Certification Statement (.pdf), click the **View**.
2. If you are ready to sign, click **Review and Sign Certification Statement**.

Logged in as:
Lois Lane

▶ Log Out

- ▶ System Administration
- ▼ Compliance
 - All Forms
 - Historical Forms
 - Certification Statements
 - Pending Certification Statements

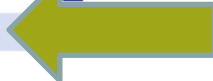


Pending Certification Statement Search Results

Search Results for All Records

	Print Date	Form Count
Review and Sign Certification Statement	<input type="checkbox"/> ▲	<input type="checkbox"/> ▲
View		1

Viewing 1 to 1 of 1 Records.



Certification Statement - Authorized Signatory Approval (continued)

1. To review the form, click the form's name.
2. If you are ready to certify that the compliance information is accurate, click **Review and Sign Certification Statement**.

Edit Certification Statement

Save PDF | Cancel Changes | Review and Sign Certification Statement | Reject Certification Statement

*Required Fields Status: Pending

*Select Authorized Signatory:

Form Name	Form Title	Functions	Compliance	Due Date	Ready for Approval Date	Filing Period
Technical Feasibility Exception Request - Part A	Technical Feasibility Exception Request - Part A			10/26/2009	10/12/2009	2009



Once you have clicked **Submit Certification Statement**, you will be asked to verify that you wish to sign the Certification Statement.

Click **OK** if you wish to submit the Certification Statement.

Important: Once the TFE request form and Certification Statement has been officially submitted to Texas RE, the form and Certification Statement cannot be retracted.

Understanding Search Results – Successful Form Submission

A date in green indicates when that the form was officially submitted to Texas RE. **Green does not indicate that the request has been approved.**

The green highlight is your indication that the form was successfully submitted. If the date is not highlighted in green, the form has not been submitted to Texas RE.

TFE Requests - Under Review - Search Results

Export List | Create Certification Statement RPP: 500

Search Results for Under Review Records

	Unique ID	Standard/Requirement	Due Date	Ready for Submittal Approval	Status
View	2009-TRE-TFE00002	CIP-005-1 R2.4.	10/26/2009		10/12/2009
View	2009-TRE-TFE00003	CIP-005-1 R3.1.	10/26/2009	1/1	10/12/2009
View	2009-TRE-TFE00004	CIP-005-1 R2.4.	10/26/2009	1/1	10/12/2009

Viewing 1 to 3 of 3 Records.

= Past Due = Due Date Approaching = Ready For Certification Statement = Received by Texas Regional Entity

TFE Requests via the Portal (continued)

- **The entity will be contacted by Texas RE staff to submit the Part B form and mitigation plan separately**
- **The TFE request will be reviewed, then accepted or rejected by Texas RE staff**
- **If the TFE request is rejected, the entity may submit an amended TFE request, revising the original form**
- **The entity may locate incomplete, under review, approved, rejected, and amended TFE request forms in the portal**



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For questions, contact
cybersec@texasre.org