

Over the past two years, Texas RE has provided outreach regarding the application and approach regarding Low-Impact BES Cyber Systems (BCS). As the April 1, 2017 Effective Date for the Low-Impact Standards nears, a number of entities across the Electric Reliability Organization (ERO) have raised specific questions regarding the application of the CIP-003-6 R2 Implementation Plan. In light of these questions, the ERO Enterprise has engaged in a collaborative effort to ensure a consistent response. Texas RE supports these collaborative efforts with all Regions and NERC to enhance consistency in actions by the ERO Enterprise.

Through these collaborative efforts, the ERO has prepared additional guidance regarding the application of CIP-003-6 R2. This guidance confirms Texas RE's previous communications regarding the application and approach for CIP-003-6 R2, as it applies to Responsible Entities with Low-Impact BCS. However, in order to ensure all registered entities in the Texas RE region have this information, Texas RE is providing the latest ERO guidance to all stakeholders at this time.

The dates on which Responsible Entities must demonstrate compliance with Reliability Standard CIP-003-6 (Cyber Security-Security Management Controls), Requirements R1 and R2 for Low Impact Bulk Electric System (BES) Cyber Systems are outlined in the NERC Standards page, accessible through the following links from the NERC webpage:

- <http://www.nerc.com/pa/CI/Documents/CIP%20Version%205%20Standards%20Implementation%20Dates%20-%20Final.xlsx>
- <http://www.nerc.net/standardsreports/standardssummary.aspx>

As noted there, the effective date for Requirement 1 is April 1, 2017. Pursuant to that requirement, Responsible Entities must have one or more documented cyber security policies, reviewed and approved by the CIP Senior Manager, for assets containing Low Impact BES Cyber Systems by April 1, 2017. The policies must collectively address:

- 1.2.1 Cyber security awareness
- 1.2.2. Physical security controls
- 1.2.3. Electronic access controls for Low Impact External Routable Connectivity (LERC) and Dial-up Connectivity; and
- 1.2.4. Cyber Security Incident response

Under Requirement 2, Responsible Entities must implement cyber security plan(s) for their Low Impact BES Cyber Systems as follows:

- For Sections 1 and 4 of Attachment 1, implementation of the plan(s) is required by April 1, 2017, including the **initial testing** of their Cyber Security Incident response plan under Section 4.5.
 - For Sections 2 and 3 of Attachment 1, implementation of the plan(s) is required by September 1, 2018.
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Therefore on September 1, 2018, each Responsible Entity's cyber security plan(s) must include the elements required by Sections 2 and 3 of Attachment 1 and the Responsible Entity must have implemented its plan to meet the objectives of Sections 2 and 3.

Texas RE's website includes a page dedicated to the transition to CIP Version 5, which is found [here](#). The intent of this page is to summarize the wealth of information available on NERC's website. If you have any additional questions, please send them to cip@texasre.org.
