



Western Electricity Coordinating Council

# *CIP Implementation Plan*

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WECC CUG Meeting  
Marriott Downtown Waterfront, Portland, OR  
June 10<sup>th</sup>, 2008

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# *Penalties and Sanctions*

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- Apply during the Compliant (C) phase
- Entities that feel they will not make the Compliant date for the “First 13” requirements in Table 1 can submit a self-report with a mitigation plan before June 30<sup>th</sup>, 2008 and receive “regional discretion” for penalties and sanctions

# *Pre-June 30<sup>th</sup> Self-Reports*

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- Self-reports will be accepted through June 30<sup>th</sup>
  - Must be submitted prior to midnight (July 1<sup>st</sup>)
- Submit early if possible!
  - Would allow time for WECC to review and respond prior to the June 30<sup>th</sup> deadline
  - If WECC rejects your submittal, you may still have time to resubmit prior to June 30<sup>th</sup>

# *Semi-Annual Self-Certifications*

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- Semi-Annual self-certifications to start July 1<sup>st</sup> and January 1<sup>st</sup>; starting July 1<sup>st</sup>, 2008
- WECC will send the semi-annual self-certification forms to the Registered Entities around mid-June, to be filed with WECC by mid-July
- A Registered Entity indicating it has not reached the milestone for a requirement will be required to submit a mitigation plan

# *Compliant Stage Monitoring*

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- Generating all necessary evidence
- Requirements subject to partial CMEP:
  - Spot Checks for cause
  - Self-Report
  - Self-Certification
  - Investigations
  - Periodic Reports
  - Penalties and Sanctions
- No audits (on-site or off-site) until 7/1/09

# *Auditably Compliant Monitoring*

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- One full year of compliance evidence
- Requirements are subject to full CMEP:
  - Audits (on-site and off-site)
  - Routine Spot Checks
  - Self-Report
  - Self-Certification
  - Investigations
  - Periodic Reports
  - Penalties and Sanctions

# *Implementation Plan – Short Story*

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- No changes to the plan itself, only the interpretation of registration (entirely separate from the CIP Standards)
- Will not shorten your compliant deadlines
- If registered before July 1<sup>st</sup>, 2007 then you will be in Table 1, 2 or 3
- Table 4 is only for entities that registered July 1<sup>st</sup>, 2007 and thereafter

# *Implementation Plan – Table 1*

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- Table 1

- Covers only those Balancing Authorities and Transmission Operators that self-certified under Urgent Action 1200 and Reliability Coordinators
- Not based on the date Registered Entities were included on the NERC Compliance Registry
- No change with respect to implementation Table 1
- Registered Entities covered by Table 1 must be compliant by July 1, 2008 for the thirteen requirements identified above that become enforceable at the “Compliant” stage

# *Implementation Plan – Table 2*

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- Table 2

- Compliance Schedule for Standards CIP-002-1 through CIP-009-1 for all Transmission Service Providers, those Balancing Authorities and Transmission Operators not required to self-certify to Urgent Action Standard 1200, NERC, and Regional Entities.

# *Implementation Plan – Table 2*

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- Table 2 example:
  - A TSP has a Compliance Registry date of May 29, 2007. Based on table descriptions, the entity would be subject to Table 4 because they have a registration date in 2007. With a registration date of May 29, 2007, the entity would have to be Compliant with CIP 003, Requirement 2 and Substantially Compliant with all other requirements on May 29, 2008. In this example Table 4 would impose a slightly accelerated schedule to the July 1, 2008 date. Therefore, the entity is subject to Table 2, the least restrictive table for their registration.

# *Implementation Plan – Table 3*

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- Table 3
  - Compliance Schedule for Standards CIP-002-1 through CIP-009-1 for Interchange Authorities, Transmission Owners, Generator Owners, Generator Operators, and Load-Serving Entities
  - Utilized based on the NERC Compliance Registry date. As stated earlier, and similar to Table 1 methodology, no one is forced to comply before December 2009 (except for the December 2008 compliance deadline for CIP-003.R2) if you are in Table 3
  - No one should be accelerated by virtue of the fact they were registered in 2007

# *Implementation Plan – Table 3*

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- Table 3 example

- A GO/GOP has a Compliance Registry date of May 31, 2007. Based on table descriptions, the entity would be subject to Table 4 because they have a registration date in 2007. With a registration date of May 31, 2007, the entity would have to be Compliant with CIP 003.R2 and Substantially Compliant with all other requirements on May 31, 2008. In this example, Table 4 would impose a seven month accelerated schedule to the December 31, 2008 date of Table 3. Therefore, the entity is subject to Table 3, the least restrictive table for their registration.

# *Implementation Plan – Table 4*

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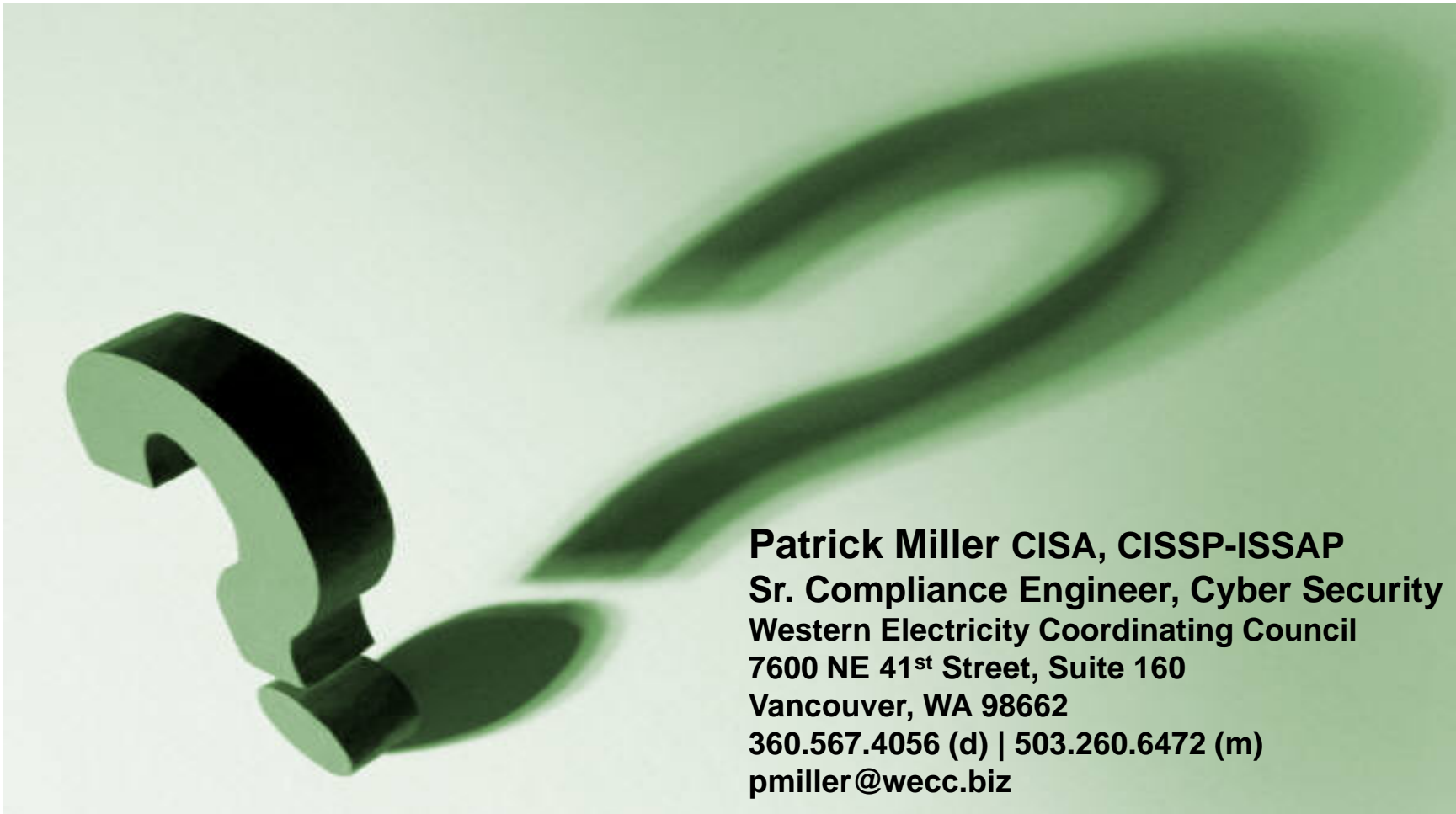
- Table 4
  - Compliance Schedule for Standards CIP-002-1 through CIP-009-1 for entities registered in 2007 and thereafter that are not covered in Table 1, Table 2 and Table 3 as outlined above
  - Intended to provide an ongoing compliance implementation schedule for entities registered after the initial effort to register owners, operators, and users of the bulk power system
  - Not intended to accelerate the compliance responsibilities of the entities covered by Tables 1, 2, and 3

# *Implementation Plan – All Tables*

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- Registered Entities with multiple functions could be covered by different tables for compliance for their different functions
  - Example: A Registered Entity self-certified to Urgent Action 1200 as a Balancing Authority and is also registered as a Transmission Service Provider and Generator Owner with a Compliance Registry date of May 31, 2007. This Registered Entity would be assigned to Table 1 for its Balancing Authority function, Table 2 for its Transmission Service Provider function, and Table 3 for its Generator Owner function.
- All CIP Implementation Tables will be implemented but will not accelerate any compliance requirements for those entities registered in 2007.

# Questions?



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