



**MIDWEST
RELIABILITY
ORGANIZATION**

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[Registered Entity Name]

NERC ID: [NCRXXXXXX]

CIP-014-2 Physical Security, R1, R2, R3

1st Quarter 2016 Guided Self-Certification



Instructions

1. Complete the tasks listed under **Appendix A**.
2. Log into **webCDMS** and complete your self-certification response.
3. Submit via the MRO EFT Encrypted Site:
 - a. This completed Worksheet; and
 - b. Specific evidence requested within the **Appendix A**. Please make sure to use unique file names for each evidence file submitted, and identify within your narratives which specific evidence files support each conclusion made. These references and the use of unique file names helps Facilitate and expedite MRO's review of the Guided Self-Certification work that has been performed.



Scope

CIP-014-2 Physical Security – R1

R1. Each Transmission Owner shall perform an initial risk assessment and subsequent risk assessments of its Transmission stations and Transmission substations (existing and planned to be in service within 24 months) that meet the criteria specified in Applicability Section 4.1.1.* The initial and subsequent risk assessments shall consist of a transmission analysis or transmission analyses designed to identify the Transmission station(s) and Transmission substation(s) that if rendered inoperable or damaged could result in instability, uncontrolled separation, or Cascading within an Interconnection. [VRF: High; Time-Horizon: Long-term Planning]

1.1 Subsequent risk assessments shall be performed:

- At least once every 30 calendar months for a Transmission Owner that has identified in its previous risk assessment (as verified according to Requirement R2) one or more Transmission stations or Transmission substations that if rendered inoperable or damaged could result in instability, uncontrolled separation, or Cascading within an Interconnection; or
- At least once every 60 calendar months for a Transmission Owner that has not identified in its previous risk assessment (as verified according to Requirement R2) any Transmission stations or Transmission substations that if rendered inoperable or damaged could result in instability, uncontrolled separation, or Cascading within an Interconnection.

1.2. The Transmission Owner shall identify the primary control center that operationally controls each Transmission station or Transmission substation identified in the Requirement R1 risk assessment.

Section 4 of CIP-014-2 has been included as a quick reference for Requirement 1

4. Applicability:

4.1. Functional Entities:

**4.1.1 Transmission Owner that owns a Transmission station or Transmission substation that meets any of the following criteria:*

4.1.1.1 Transmission Facilities operated at 500 kV or higher. For the purpose of this criterion, the collector bus for a generation plant is not considered a Transmission Facility, but is part of the generation interconnection Facility.

4.1.1.2 Transmission Facilities that are operating between 200 kV and 499 kV at a single station or substation, where the station or substation is connected at 200 kV or higher voltages to three or more other Transmission stations or substations and has an "aggregate weighted value" exceeding 3000 according to the table below. The "aggregate weighted value" for a single station



Scope Continued

or substation is determined by summing the "weight value per line" shown in the table below for each incoming and each outgoing BES Transmission Line that is connected to another Transmission station or substation. For the purpose of this criterion, the collector bus for a generation plant is not considered a Transmission Facility, but is part of the generation interconnection Facility.

Voltage Value of a Line	Weight Value per Line
less than 200 kV (not applicable)	(not applicable)
200 kV to 299 kV	700
300 kV to 499 kV	1300
500 kV and above	0

4.1.1.3 Transmission Facilities at a single station or substation location that are identified by its Reliability Coordinator, Planning Coordinator, or Transmission Planner as critical to the derivation of Interconnection Reliability Operating Limits (IROLs) and their associated contingencies.

4.1.1.4 Transmission Facilities identified as essential to meeting Nuclear Plant Interface Requirements.

4.1.2 Transmission Operator.

Exemption: Facilities in a "protected area," as defined in 10 C.F.R. § 73.2, within the scope of a security plan approved or accepted by the Nuclear Regulatory Commission are not subject to this Standard; or, Facilities within the scope of a security plan approved or accepted by the Canadian Nuclear Safety Commission are not subject to this Standard.



Scope Continued

CIP-014-2 Physical Security – R2

R2. Each Transmission Owner shall have an unaffiliated third party verify the risk assessment performed under Requirement R1. The verification may occur concurrent with or after the risk assessment performed under Requirement R1. *[VRF: Medium; Time-Horizon: Long-term Planning]*

2.1. Each Transmission Owner shall select an unaffiliated verifying entity that is either:

- A registered Planning Coordinator, Transmission Planner, or Reliability Coordinator; or
- An entity that has transmission planning or analysis experience.

2.2. The unaffiliated third party verification shall verify the Transmission Owner's risk assessment performed under Requirement R1, which may include recommendations for the addition or deletion of a Transmission station(s) or Transmission substation(s). The Transmission Owner shall ensure the verification is completed within 90 calendar days following the completion of the Requirement R1 risk assessment.

2.3. If the unaffiliated verifying entity recommends that the Transmission Owner add a Transmission station(s) or Transmission substation(s) to, or remove a Transmission station(s) or Transmission substation(s) from, its identification under Requirement R1, the Transmission Owner shall either, within 60 calendar days of completion of the verification, for each recommended addition or removal of a Transmission station or Transmission substation:

- Modify its identification under Requirement R1 consistent with the recommendation; or
- Document the technical basis for not modifying the identification in accordance with the recommendation.

2.4. Each Transmission Owner shall implement procedures, such as the use of non-disclosure agreements, for protecting sensitive or confidential information made available to the unaffiliated third party verifier and to protect or exempt sensitive or confidential information developed pursuant to this Reliability Standard from public disclosure.



Scope Continued

CIP-014-2 Physical Security – R3

R3. For a primary control center(s) identified by the Transmission Owner according to Requirement R1, Part 1.2 that a) operationally controls an identified Transmission station or Transmission substation verified according to Requirement R2, and b) is not under the operational control of the Transmission Owner: the Transmission Owner shall, within seven calendar days following completion of Requirement R2, notify the Transmission Operator that has operational control of the primary control center of such identification and the date of completion of Requirement R2. *[VRF: Lower; Time-Horizon: Long-term Planning]*

3.1. If a Transmission station or Transmission substation previously identified under Requirement R1 and verified according to Requirement R2 is removed from the identification during a subsequent risk assessment performed according to Requirement R1 or a verification according to Requirement R2, then the Transmission Owner shall, within seven calendar days following the verification or the subsequent risk assessment, notify the Transmission Operator that has operational control of the primary control center of the removal.



Appendix A (Steps)

1. As a Transmission Owner (TO), do you own Transmission Facilities as defined in 4.1.1 of the Applicability section above?
 - Yes, go to Step 2.
 - No, respond “Not Applicable” to the Self-Certification in webCDMS for CIP-014-2 R1, R2, and R3. You are finished with this Self-Certification.
2. Per Applicability, Section 4.1.1, please update your Facility verification form. This should include a list of all wholly-owned or jointly-owned Facilities (this should include existing and those planned to be in service within 24 months), and all of the ‘Operators’ for said Facilities. Ensure you update all of the tabs including ‘Transmission Lines,’ ‘BES Substations,’ ‘TOP,’ ‘Generators,’ and ‘3rd-Party Gen.’

NOTE: All wholly- and jointly-owned transmission Facilities must be accounted for. Ensure you list who the other owners of the Facility are, and who operationally controls it. Due to the nature of jointly owned Facilities in the MRO region, this extra Step is provided to ensure jointly owned Facilities are included. If you have extra questions about any joint ownership items to include, contact the proper individual as listed in the Self-Certification Notification Letter.

Updated Facility Verification and TOPs	
<i>File Name</i>	<i>File Description/Contents</i>

The latest Facility Verification sheet was sent with your Self-Certification Questionnaire.



3. Per R1, did you perform a risk assessment?

- Yes, see details below on providing your documentation.
- No, respond “Not Compliant” to the Self-Certification in webCDMS for CIP-014-2 R1, R2, and R3, and explain in comment box below:

Comments

If “Yes”, provide your initial risk assessment and results. Include all policy, procedure, and detailed documents related to conducting your initial risk assessment, subsequent risk assessments, and the results. Ensure you include the results of a detailed assessment of the transmission Facilities that meet the criteria in Section 4.1.1, including evaluation of the "aggregate weighted value" of the Facility per Section 4.1.1.2.

Risk Assessment files, aggregated weighted value and other Section 4.1.1 documents	
<i>File Name</i>	<i>File Description/Contents</i>

4. Select a random sample of wholly-owned or jointly-owned Facilities that meet the Section 4.1.1 applicability criteria but that did not appear in the results of your risk assessment.

A random sample can be selected using statistical functions available in Microsoft Excel or through use of RAT-STATS¹, a free sampling tool available from the U.S.

Department of Health & Human Services Office of Inspector General. Use the following logic to select your sample:

- a. Make sure at least one sampled Facility is owned by your organization either jointly or in conjunction with another entity (if applicable).
- b. Make sure the sampled Facilities represent at least 10% of all Facilities you own or jointly own (from the Facility verification sheet).
- c. Make sure there are at least five (5) total Facilities in the sample. If the total population is comprised of five (5) or fewer Facilities, select the whole population.
- d. Provide documentation describing the sampling process used, including output from any random sampling tool utilized, and the list of the sampled Facilities.

Using the sample you have selected, revisit your assessment and confirm that the Facility, if rendered inoperable or damaged, would not “result in instability, uncontrolled

¹ RAT-STATS can be found at: <https://oig.hhs.gov/compliance/rat-stats/index.asp>



separation, or Cascading within an Interconnection” per R1. For each sampled Facility, provide a summary description in the table below regarding the results of the risk assessment.

Discussion of Risk Assessment Results per Facility		
<i>Sample #</i>	<i>Facility</i>	<i>Description</i>
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		

Were there any discrepancies between the sample and the results of your R1 risk assessment (i.e. did you identify any Facilities that should have been included in your R1 results as part of the sampling review)?

- No, respond “Compliant” to the Self-Certification in webCDMS for CIP-014-2 R1, and go to Step 5.
- Yes, respond “Not Compliant” to the Self-Certification in webCDMS for CIP-014-2 R1, and explain any discrepancies between the sampling and the results of the R1 risk assessment using one or both of the boxes below.

If “Yes”, explain here:

Explanation of sampling results and discrepancies	
<i>File Name</i>	<i>File Description/Contents</i>



5. Per R2.1, did you select an unaffiliated third party that was appropriately qualified to conduct a review of your risk assessment results?

- Yes, provide a description of your selection process, and results for third party selection.

If "Yes", explain here:

- No, respond "Not Compliant" to the Self-Certification in webCDMS for CIP-014-2 R2, and explain your response below.

If "No", explain here:

Third Party Selection Files	
<i>File Name</i>	<i>File Description/Contents</i>

6. Per R2.2, did you receive the verification from the unaffiliated third party?

- Yes, provide verification file(s) and documentation of the third party verification results, including any recommendations.

- No, respond "Not Compliant" to the Self-Certification in webCDMS for CIP-014-2 R2, and explain why you did not receive third party verification. Also provide verification file(s) and documentation of the third party verification results.

If "No", explain here:

Third Party Verification	
<i>File Name</i>	<i>File Description/Contents</i>



7. Per R2.3, were there any recommendations as a result of the third party verification to add or remove Facilities?

No, continue to the Step 8.

Yes, answer the following:

a) Did you address all recommendations?

Yes, explain below.

No, explain below and skip to “c”.

b) Provide a statement that addresses how your risk assessment was modified to accommodate the recommendations. Alternately, provide a description of the technical basis for the decision to not accept a given recommendation here:

c) List any files here to support your statement:

Third Party Recommendations	
<i>File Name</i>	<i>File Description/Contents</i>

8. Per R2.4, did you implement procedures for protecting confidential information made available to the unaffiliated third party verifier?

Yes, Please provide documentation of the procedures.

No, respond “Not Compliant” to the Self-Certification in webCDMS for CIP-014-2 R2, and explain why such procedures were not established.

Third Party Information Protection	
<i>File Name</i>	<i>File Description/Contents</i>

9. Per R3.1, did you notify the Transmission Operator who “operationally controls” any transmission substations (identified in R1, part 1.2, and verified under R2) that are not operated



by your organization?

Please note: This ‘notification’ is to ensure that all TOPs are aware of the critical nature of any transmission Facilities they operate, but do not own. If your entity is both the owner of the substation and the sole TOP for all Facilities at that substation, there is no need to provide evidence of notification.

- Yes, provide documentation of the notifications, including but not limited to a description of notification procedures and sample emails or other communications.
- No, respond “Not Compliant” to the Self-Certification in webCDMS for CIP-014-2 R3, and explain why the required notifications did not occur.

If “No”, explain here:

Control Center Operator of Transmission Substation Notification

<i>File Name</i>	<i>File Description/Contents</i>



Document Submittals

MRO requires copies of the following be submitted with the self-certification response:

- ✓ Updated Facility Verification and TOPs
- ✓ Risk Assessment files, aggregated weighted value and other Section 4.1.1 documents
- ✓ Jointly owned Facilities - Confirmation for Facility verification and TOP
- ✓ Third Party Selection Files
- ✓ Third Party Verification
- ✓ Third Party Recommendations
- ✓ Third Party Information Protection
- ✓ Control Center Operator of Transmission Substation Notification

Please make sure to use unique file names for each evidence file submitted, and identify within your narratives which specific evidence files support each conclusion made. These references and the use of unique file names helps Facilitate and expedite MRO's review of the Guided Self- Certification work that has been performed.

All other data related to the Registered Entity's analysis and self-certification response are to be retained for 180 days after the submission date. MRO staff may request submission of additional information at a later date, on a random basis, to verify accuracy of self-certification submittals.