



ANNUAL INDUSTRY WORKSHOP  
NOVEMBER 6-7, 2013

# EXECUTIVE / LEGISLATIVE ACTIONS AFFECTING EDS CYBERSECURITY -- UTILITY PROSPECTIVE.

NOVEMBER 2013

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(CONTRACTED COMED PROJECT MANAGER)

## NERC CIP VERSIONS V3 – V5 REGULATION

- NERC CIP V3 – Current Version
  - Discretionary, risk-based assessment: How to assess and identify Critical Assets
    - ComEd removed routable protocols (mitigating assets)
- NERC CIP V4 – Effective 10/1/2014
  - “Brightline” criteria used to identify Critical Assets
    - 43 ComEd Substa. become Critical Assets; 26 require work to comply with V4
- NERC CIP V5 – Effective (TBD)
  - Cyber Assets categorized as High, Med, or Low

## NERC CIP V4: COMED PILOT & MITIGATION SITES

- **IP Connected Substation Utilizing Upgrades**
  - Determine feasibility & capture lessons learned
    - ComEd removed routable protocols (mitigating assets)
    - Exelon benchmark utilities
    - Exelon IT and Compliance CIP staff consultation
    - Socialize mitigation work (25 sites) affecting generator interconnection Customers (including Nuclear)
- **Business Impact**
  - Pilot project provides broad technical platform
    - Support future tools, integration systems
    - Smart Grid (AMI, DA, Substations Inter-operability)

## NERC CIP V4: COMED PILOT SUMMARY

- Pilot Substation Summary
  - Construction, workforce training (Complete)
  - Integrate new processes/procedures (In Progress)
    - Account Management
    - Information Protection
    - Configuration / Change Management
    - Patch Management
    - Cyber Vulnerability Audit
    - Disaster Recovery Plans
  - Conduct cyber audit & gap analysis (In Progress)

## NERC CIP V4: COMED PILOT CHALLENGES

- Exelon IT Works Closely with Brightline Team
  - Leveraging common enterprise platforms
  - What's changing
    - IT Architecture, new equipment
    - Access to substations and equipment
    - Compliance requirements & new procedures
    - Workforce demographics & complex work
  - Challenges for CIP Compliance
    - Volume of compliance documentation
    - Background checks, awareness/ongoing training
    - Training next generation of substation workers

## NERC CIP V4: COMED LESSONS LEARNED

- Collaboration of Several Business Units
- Understanding Process & Procedure Impacts
- Decision Makers Have SME Inputs
- Engage PM (Integrated Schedule/Resources)
- Forecast Mat'ls, All Resources, Contingency
- Don't Under Estimate Complexity of Project