

Reclamation Manual

Directives and Standards

TEMPORARY RELEASE

(Expires 03/30/2013)

- Subject:** Critical Asset (CA) Identification Supporting North American Electric Reliability Corporation (NERC) Reliability Standard Compliance
- Purpose:** To establish a single, Reclamation-wide process and criteria supporting the identification of CAs and in support of the reliability of cyber systems supporting the Bulk Electric System (BES). The benefit of this Directive and Standard (D&S) is that it promotes improved compliance with the Critical Infrastructure Protection (CIP) Reliability Standards of NERC.
- Authority:** The Reclamation Act of 1902 (Act of June 17, 1902, ch. 1093; 32 Stat. 388), the Town Sites and Power Development Act of 1906 (Act of April 16, 1906, ch. 1361, 34 Stat. 116), Federal Power Act of 1920 (Act of June 10, 1920, ch. 285, 41 Stat. 1063), Reclamation Project Act of 1939 (Act of August 4, 1939, ch. 418, 53 Stat. 1187), Department of Energy Act of 1977 (Act of August 4, 1977, Pub. L. 95-91; 91 Stat. 565), Energy Policy Act of 1992 (Act of October 24, 1992, 106 Stat. 2776), Energy Policy Act of 2005 (Act of August 8, 2005, 119 Stat. 594), acts relating to individual dams or projects, and Federal Energy Regulatory Commission (FERC) approved NERC Reliability Standards (18 CFR Part 40).
- Approving Official:** Director, Information Resources Office (IRO)
- Contact:** IRO, 84-21000
Power Resources Office (PRO), 86-61600

1. **Introduction.** The NERC CIP Standards establish logical and physical protection requirements designed to defend cyber-controlled and monitored BES assets from cyber-based security threats, vulnerabilities, and incidents. The protection requirements are applicable to cyber systems and cyber assets based on the identification of these assets as essential in supporting CAs that are elements of the BES. This D&S establishes requirements and criteria to support the identification of Reclamation's CAs.
2. **Applicability.** This D&S applies to all Reclamation personnel responsible for the identification of Reclamation CAs supporting the BES and comprised of Reclamation-operated and -maintained power and power-related projects, facilities, and features. This D&S also addresses the appropriate management and protection of information related to identified Reclamation CAs.

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3. **Definitions.**

- A. **BES.** The electrical generation resources, transmission lines, interconnections with neighboring systems, and associated equipment, generally operated at voltages of 100 kV or higher. Radial transmission facilities serving only load with one transmission source are generally not included in this definition.
- B. **Certifying.** For the purposes of this D&S, Certifying is the act of attesting to the completion and appropriate review of information submitted in response to a requirement.
- C. **Change Management.** The management control and related processes supporting risk, impact, cost, or other metric-based decision-making regarding changes to a system, systems, or system component. Change management also includes the maintenance of information (and requisite documentation) regarding the change decisions made.
- D. **CA.** A facility, system, or equipment which, if destroyed, degraded, or otherwise rendered unavailable, would affect the reliability or operability of the BES.
- E. **Days.** Wherever used in this D&S, days refers to contiguous calendar days, including weekends and holidays.
- F. **Directorate.** The organizational component of a Director. This includes the Director, Technical Resources; Regional Directors; Director, Security, Safety, and Law Enforcement (SSLE); Director, Policy and Administration; and Director, IRO.
- G. **Directors.** Reclamation Senior Executives responsible for specific programs or facilities. This includes: the Director, Technical Resources; Regional Directors; Director, SSLE; and Director, IRO.

4. **Responsibilities.**

- A. **Director, Technical Resources.** The Director, Technical Resources is responsible for annual preparation, review, and approval of Reclamation's risk-based CA identification methodology as formalized in Appendix A. Responsibilities for the preparation of the CA identification methodology and the review and preparation of the preliminary CA inventory may be delegated. The Director, Technical Resources is responsible for the approval of the final CA inventory.

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- B. **Technical Resources, Senior Advisor, Hydropower.** The Senior Advisor, Hydropower administers the Electric Reliability Compliance Program. Working with all responsible directors, the Senior Advisor, Hydropower certifies Reliability Standards' compliance, as applicable, to NERC and the Western Electricity Coordinating Council.
- C. **Technical Resources, Power Resources Manager.** The Power Resources Manager is responsible for the maintenance, adjudication, and distribution of Reclamation's CA inventory in support of this and other related D&S.
- D. **Director, IRO.** The Director, IRO is identified as Reclamation's senior manager with overall responsibility for leading and managing the implementation and adherence to the NERC CIP standards.
- E. **Director, SSLE.** The Director, SSLE is responsible for the establishment, execution and documentation of compliance measures supporting the physical and personnel protection measures identified in the NERC CIP standards.
- F. **Directors.** Each director is responsible for the establishment, execution, and documentation of all compliance activities related to the identification of CAs within their directorate. This includes the collection, coordination, and submittal of information as necessary to support the final CA determination and adjudication by the PRO. All such activities shall be focused on achieving, maintaining, and supporting demonstrable evidence of compliance with the Reliability Standards.
- G. **Reliability Compliance Representative.** As required in Reclamation Manual Policy, *North American Electric Reliability Corporation (NERC) Electric Reliability Standard Compliance* (FAC P13), each directorate is represented by a Reliability Compliance Representative who is responsible for coordinating directorate compliance-related matters with the PRO and the other directorates. Unless otherwise indicated and documented by the directorate, the Reliability Compliance Representative is responsible for coordinating directorate CA identification processes, procedures, and information submittals and securing any certifications necessary to support final reporting.
- H. **Area Managers.** Area managers responsible for identified CAs are responsible and accountable for performing and documenting activities within the area office to become and maintain compliance with this D&S.

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5. Procedures.

- A. **Identification of CAs.** The initial identification of CAs shall follow the process developed and outlined in Appendix A. This methodology is maintained by Reclamation's PRO.
- B. **Adjudication of CA Identification.** Final determination and adjudication of Reclamation's CAs will be completed by the PRO based on the methodology referenced in Paragraph 5.A., above. The PRO will utilize all relevant information, including that available from partner entities and reliability studies, to prepare the final CA inventory.
- C. **Maintenance of CA Inventory.** Lists of CAs established under the requirements of this D&S must be actively maintained based on strong change management and documentation processes. Changes to Reclamation's CA inventory will be evaluated throughout the year, but will be collected in support of compliance efforts approximately 120 days prior to the end of each calendar year.
- D. **Distribution of CA Inventory.** The full finalized inventory of CAs will be formally furnished to the IRO and SSLE directorates in support of their NERC CIP standards compliance obligations. The CA inventory applicable to each region will be formally furnished to each Regional Director and Reliability Compliance Representative in accordance with their project listings and facilities.
- E. **Protection of CA Information.** Specific information related to the identification of CAs and the CA inventory are FOR OFFICIAL USE ONLY (FOUO) records and are subject to protection under appropriate Reclamation D&S. The CA identification methodology, addressed in Appendix A, is not considered FOUO. Access to Reclamation's CA inventory, or to key information establishing the rationale for a specific asset being placed on the CA inventory, shall not be granted to individuals, either internal or external to Reclamation, without establishing a specific need-to-know and securing proper access authorization. Authorization(s) must be secured from designated Reclamation personnel responsible for the management of access to protected CA information. Further requirements applicable to CA information protection and access are addressed in the Reclamation Manual D&S, *Identification and Protection of Critical Cyber Asset (CCA) Information Supporting North American Electric Reliability Corporation (NERC) Reliability Standard Compliance* (IRM TRMR-36).

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- F. **Retention of CA Records.** Information related to the identification of CAs and the resultant CA inventory shall be retained for a period of not less than 1 calendar year after their effective date.
6. **Related D&S.** Related and supporting D&S, as well as overarching Policy, are available in the Information Resources Management (IRM) section of the Reclamation Manual.