

Summary of Proposed Reliability Standard CIP-014-4

Proposed Reliability Standard CIP-014-4 — Physical Security

Details of Standard(s) Development

Reliability Standards Authority: NERC

Standard(s)	CIP-014-4 — Physical Security
Purpose	To identify and protect Transmission stations and Transmission substations, and their associated primary control centers, that if rendered inoperable or damaged due to a physical attack, could result in instability, uncontrolled separation, or Cascading within an Interconnection.
Change Type:	FERC DIRECTIVE
Affected Functional Entities:	• Transmission Owner (TO) • Transmission Operator (TOP)
Ballot Results:	CIP-014-4: 80.55% Quorum / 80.05% Approval
Ontario Participant Support:	There were 236 votes cast by NERC registered entities. 1 OEB rate-regulated entities voted (1/236) Negative.
Impact Within Ontario	Not Assessed.

Standards Development Milestones¹

Date	Action
June 17, 2026	• Adopted by NERC Board of Trustees
July 28, 2026	• NERC Petition for Approval
July 31, 2026	• IESO Posting Date
November 28, 2026	• End of OEB Review Period

Summary

Proposed Reliability Standard CIP-014-4 (Physical Security) is developed in response to FERC's December 2022 directive and NERC's subsequent CIP-014 Report, which identified inconsistencies in how registered entities perform CIP-014 risk assessments to identify critical infrastructure.

NERC concluded that the existing CIP-014 applicability criteria remain appropriate and does not recommend expanding the applicability of the standard. However, compliance monitoring activities identified inconsistent approaches to performing CIP-014 risk assessments, and in some instances registered entities did not provide sufficient technical studies or justification for study decisions.

To address these concerns, CIP-014-4 introduces new and revised requirements that clarify risk assessment methodologies, study assumptions, and documentation expectations. The proposal requires documented risk assessment methodologies, the use of both steady-state and dynamic studies, consideration of proximate facilities when evaluating physical attack scenarios, and coordination requirements for jointly owned facilities. Requirements related to risk assessment verification, notification, threat and vulnerability assessments, physical security plans, and independent third-party reviews remain substantively unchanged from the currently approved standard, with renumbering, updated cross-references, and minor editorial revisions.

Other Salient Information

Stakeholder Consultation

NERC Reliability Standards Development Procedure

- NERC develops Reliability Standards in accordance with Section 300 (Reliability Standards Development) of its Rules of Procedure and the NERC Standard Processes Manual;
- NERC's rules provide for reasonable notice and opportunity for public comment, due process, openness, and a balance of interests in developing Reliability Standards;
- The development process is open to any person or entity with a legitimate interest in the reliability of the Bulk Power System. NERC considers the comments of all stakeholders;

¹ The next steps will be the issuance of the FERC Order followed by determination of the [Ontario Enforcement Date](#).

- Stakeholders must approve, and the NERC Board of Trustees must adopt, a new or revised Reliability Standard before NERC submits the Reliability Standard to FERC for approval;
- NERC provided public notices for comments and balloting as follows:
 - Standard Authorization Request Comment: July 26 – August 24, 2023
 - First Posting: May 20 – July 3, 2024
 - Second Posting: September 23 – November 6, 2024
 - Third Posting: June 6 – July 21, 2025
 - Forth Posting: March 31 – May 14, 2025
 - Final Ballot: May 28 – June 8, 2026

IESO Reliability Standards Standing Committee

- The purpose of the Reliability Standards Standing Committee (RSSC) is to assist market participants to develop a more comprehensive understanding of their reliability obligations by:
 - Notifying participants of reliability-related information on new and developing reliability standards;
 - Providing a forum to discuss and develop consensus comments on new and developing reliability standards; and
 - Engaging participants in the standard development process of NERC and NPCC.
- The majority of stakeholder engagement takes place by email communications and is open to any stakeholder wishing to join
- The IESO presented the proposed changes at the following RSSC meetings:
 - September 14, 2023
 - March 14, 2024
 - June 13, 2024
 - December 11, 2024