NERC CIP Compliance
BRIDGE Energy Group accelerates ComEd’s organizational compliance capabilities, and better prepares the utility for NERC CIP v5 Requirements

Company Profile
Commonwealth Edison Company, ComEd, is a unit of Chicago-based Exelon Corporation (NYSE: EXC). Exelon is one of the nation’s largest electric utilities, with approximately 5.4 million customers. ComEd provides service to approximately 3.8 million customers across Northern Illinois, or 70 percent of the state’s population. ComEd manages more than 90,000 miles of powerlines in an 11,400-square-mile territory. Since 2001, they have invested more than $5 billion in its electrical transmission and distributions system to continue to provide safe, reliable electric service to its customers.

Objectives of the Program
With large infrastructure changes and an audit on the horizon, ComEd needed additional resources to help meet compliance requirements. ComEd’s ultimate goal was to improve the existing NERC CIP V3 compliance program and prepare for then-pending V4 and V5 compliance requirements.

BRIDGE Solution
ComEd turned to BRIDGE Energy Group for an extended engagement with subject matter experts in NERC CIP. As part of developing a strategy for compliance program improvement, BRIDGE’s experts worked on the mitigation, compliance processes, procedures, implementation and execution of the plan.

BRIDGE provided services in the areas of strategy and program development, ongoing program support, audit support and training. The team began with an assessment to document the current compliance process and technology, compare internal and industry best practices, and identify gaps, constraints issues and risks. A resource loaded plan was developed and business cases were supported to properly resource the compliance activities, as well as to manage the routine compliance work, compliance project work and emergent work.

BRIDGE NERC CIP consultants were able to understand the rigorous documentation requirements for evidentiary support needed for audits and were able to guide ComEd to efficient and effective documentation practices.
Outcomes

With BRIDGE providing key NERC CIP expertise and compliance program support, ComEd successfully met its year-end goals and completed its mitigation plan in a shorter amount of time and with increased mitigation of potential violations. The existing compliance program was improved to meet current compliance requirements and provide a foundation for future NERC CIP requirements. Additionally, organizational compliance capabilities, including knowledge of best practices, were instituted with compliance team development and training.

Exelon, ComEd’s parent company, subsequently chose BRIDGE to provide a NERC CIP v5 and enterprise-wide compliance convergence strategy, including a readiness assessment and prioritized roadmap. Additionally for ComEd, BRIDGE continues to maintain the compliance plan and participate in day-to-day compliance process improvements and preparation for compliance with NERC CIP v5 requirements.

Why BRIDGE

In addition to their NERC CIP credentials BRIDGE consultants have deep backgrounds in OT systems, IT systems, and compliance management processes and toolsets enabling them to operate within NERC CIP teams and across OT and IT groups. ComEd selected BRIDGE for this unique expertise and the following reasons:

• Depth in OT, EMS/SCADA and substation experience
• Methodology and expertise in Strategic Assessments to determine current situation and gaps, and build a prioritized roadmap, including recommendations for key elements (Patch Management, Asset Categorization, Compliance Management, etc.)
• Knowledge and expertise in industry best practices
• Knowledge of relevant Product Suites for NERC CIP Compliance Management
• Ability to implement and integrate automated solutions, in addition to defining compliance strategy and technology needs
• Ability to manage broad range of work - from data support to compliance to team leadership - while remaining responsive to changing priorities

“I was impressed by BRIDGE’s approach and methodology in the NERC CIP Audit process. BRIDGE’s expertise across compliance management processes and toolsets enabled ComEd to implement holistic and defensible compliance and better prepare us for NERC CIP v5 requirements. BRIDGE was uniquely mindful in avoiding over-commitment, resulting in an easier and more successful audit preparation process.”

Richard Rosenstiel
IT Director
ComEd, An Exelon Company