

## Consideration of Issues and Directives

### Project 2016-02 Modifications to CIP Standards

Project 2016-02 Modifications to CIP Standards		
Issue or Directive	Source	Consideration of Issue or Directive
<p>Based on the comments received in response to the NOPR, the Commission concludes that a modification to the Low Impact External Routable Connectivity definition to reflect the commentary in the Guidelines and Technical Basis section of CIP-003-6 is necessary to provide needed clarity to the definition and eliminate ambiguity surrounding the term “direct” as it is used in the proposed definition. Therefore, pursuant to section 215(d)(5) of the FPA, we direct NERC to develop a modification to provide the needed clarity, within one year of the effective date of this Final Rule. We agree with NERC and other commenters that a suitable means to address our concern is to modify the Low Impact External Routable Connectivity definition consistent with the commentary in the Guidelines and Technical Basis section of CIP-003-6.</p>	<p>FERC Order 822, Paragraph 73; issued January 21, 2016</p>	<p>The Project 2016-02 Standard Drafting Team (SDT) revised the definition of the term Low Impact External Routable Connectivity to resolve the ambiguity surrounding the term “direct” identified by the Commission. In doing so, the SDT changed the term to Low Impact External Routable <i>Communication</i> (LERC) and simplified the definition so that LERC is an attribute of an asset containing low impact BES Cyber Systems. As revised, LERC exists where there is routable protocol communication that crosses the asset boundary without regard to whether 'direct' or 'indirect' access may occur. The revised LERC definition removes the dependency between the electronic access controls that may be in place and having those controls determine whether LERC exists or not. The SDT determined that indirect access, regardless of what kind of 'security break' is in place causing it to be indirect, is another form of electronic access control that is intended to meet the same security objective.</p> <p>The SDT determined that the requirements should address the electronic access controls rather than having some controls implied through the definition. Therefore, for those assets containing low impact BES Cyber Systems that have</p>

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		<p>LERC, the SDT changed the language in Attachment 1, Section 3.1 from requiring a Low Impact Electronic Access Point (LEAP) to requiring that electronic access controls be implemented to meet the security objective of permitting “only necessary electronic access to low impact BES Cyber Systems.” Additionally, the SDT expanded the Guidelines and Technical Basis with numerous examples of electronic access control concepts that accomplish this objective.</p> <p>Given the modified definition of LERC and the proposed modifications in Reliability CIP-003-7, there is no longer a need for the NERC Glossary term Low Impact BES Cyber System Electronic Access Point (LEAP). Consequently, the SDT proposed the term’s retirement.</p>