

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Cyber Security – Electronic Security Perimeter(s)

Technical Rationale and Justification for
Reliability Standard CIP-005-7

October 2020

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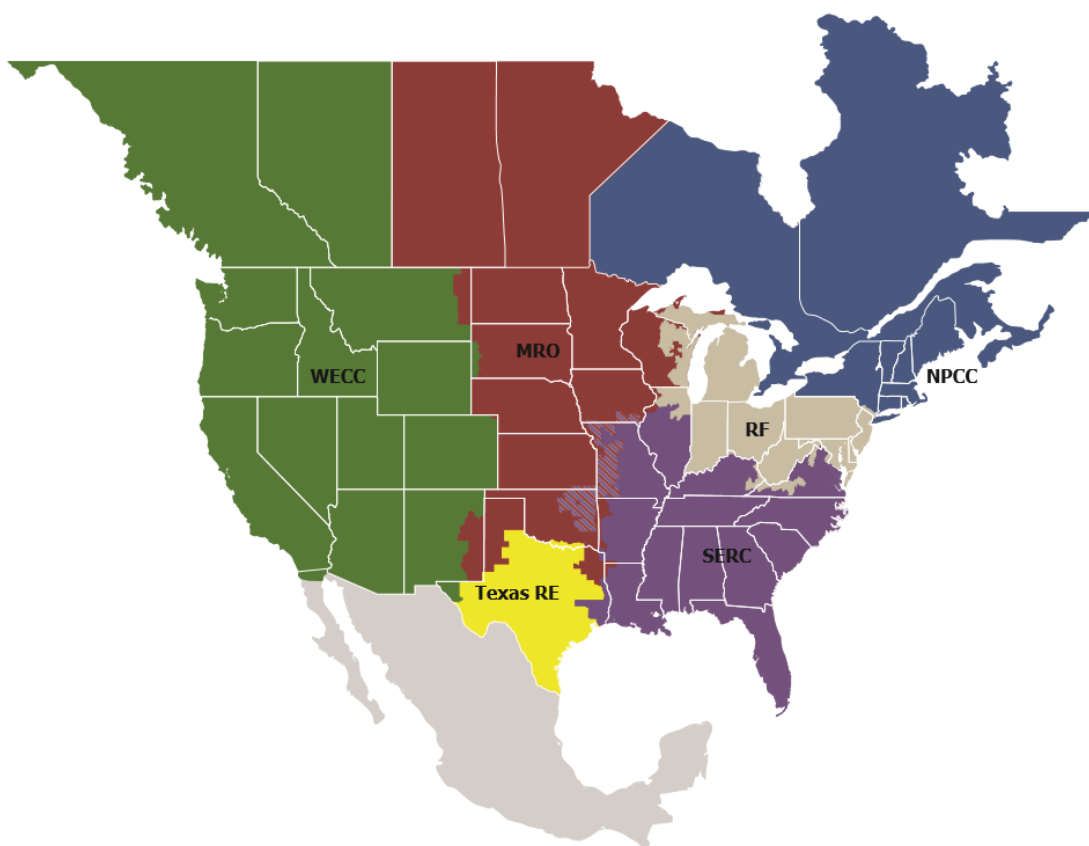
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Preface

Electricity is a key component of the fabric of modern society and the Electric Reliability Organization (ERO) Enterprise serves to strengthen that fabric. The vision for the ERO Enterprise, which is comprised of the North American Electric Reliability Corporation (NERC) and the six Regional Entities (REs), is a highly reliable and secure North American bulk power system (BPS). Our mission is to assure the effective and efficient reduction of risks to the reliability and security of the grid.

Reliability | Resilience | Security
Because nearly 400 million citizens in North America are counting on us

The North American BPS is divided into six RE boundaries as shown in the map and corresponding table below. The multicolored area denotes overlap as some load-serving entities participate in one Region while associated Transmission Owners/Operators participate in another.



MRO	Midwest Reliability Organization
NPCC	Northeast Power Coordinating Council
RF	ReliabilityFirst
SERC	SERC Reliability Corporation
Texas RE	Texas Reliability Entity
WECC	Western Electricity Coordinating Council

Introduction

This document explains the technical rationale and justification for the proposed Reliability Standard CIP-005-7. It provides stakeholders and the ERO Enterprise with an understanding of the technology and technical requirements in the Reliability Standard. This Technical Rationale and Justifications for CIP-005-7 is not a Reliability Standard and should not be considered mandatory and enforceable.

Section “4. Applicability” of the standards provides important information for Responsible Entities to determine the scope of the applicability of the CIP Cyber Security Requirements.

Section “4.1. Functional Entities” is a list of NERC functional entities to which the standard applies. If the entity is registered as one or more of the functional entities listed in Section 4.1, then the NERC CIP Cyber Security Standards apply. Note that there is a qualification in this Section that restricts the applicability in the case of Distribution Providers to only those that own certain types of systems and equipment listed in 4.2.

Furthermore, Section “4.2. Facilities” defines the scope of the Facilities, systems, and equipment owned by the Responsible Entity, as qualified in Section 4.1, that is subject to the requirements of the standard. As specified in the exemption section 4.2.3.5, this standard does not apply to Responsible Entities that do not have High Impact or Medium Impact BES Cyber Systems under CIP-002-5’s categorization. In addition to the set of Bulk Electric System (BES) Facilities, Control Centers, and other systems and equipment, the list includes the set of systems and equipment owned by Distribution Providers. While the NERC Glossary term “Facilities” already includes the BES characteristic, the additional use of the term BES here is meant to reinforce the scope of applicability of these Facilities where it is used, especially in this applicability scoping section. This in effect sets the scope of Facilities, systems, and equipment that is subject to the standards.

Updates to this document now include the Project 2019-03 – Cyber Security Supply Chain Risks Standard Drafting Team’s (SDT’s) intent in drafting changes to the requirements.

The Federal Energy Regulatory Commission (the Commission) issued Order No. 850 on October 18, 2018, calling for modifications to the Supply Chain Suite of Standards to address Electronic Access Control or Monitoring Systems (EACMS), specifically those system that provide electronic access control or monitoring to high and medium impact BES Cyber Systems. In addition, NERC also recommended revising the Supply Chain Standards in its May 17, 2019 NERC Cyber Security Supply Chain Risk Report to address Physical Access Control Systems (PACS) that provide physical access control to high and medium impact BES Cyber Systems.

The Project 2019-03 SDT drafted Reliability Standard CIP-005-7 to require Responsible Entities to meet the directives set forth in the Commission’s Order No. 850 and the NERC Cyber Security Supply Chain Risk Report.

Additionally, the Project 2019-03 SDT removed Interchange Coordinator or Interchange Authority as that registration has been retired.

New and Modified Terms Used in NERC Reliability Standards

CIP-005-7 uses the following definition(s), which are cited below for reference when reading the technical rationale that follows.

Proposed Modified Terms: None

Proposed New Terms: None

Requirement R1

General Considerations for Requirement R1

The Electronic Security Perimeter (“ESP”) serves to control traffic at the external electronic boundary of the BES Cyber System. It provides a first layer of defense for network-based attacks as it limits reconnaissance of targets, restricts and prohibits traffic to a specified rule set, and assists in containing any successful attacks.

Summary of Changes: CIP-005, Requirement R1 has taken more of a focus on the discrete Electronic Access Points, rather than the logical “perimeter.”

CIP-005 (V1 through V4), Requirement R1.2 has been deleted from V5. This requirement was definitional in nature and used to bring dial-up modems using non-routable protocols into the scope of CIP-005. The non-routable protocol exclusion no longer exists as a blanket CIP-002 filter for applicability in V5, therefore there is no need for this requirement.

CIP-005 (V1 through V4), Requirement R1.1 and R1.3 were also definitional in nature and have been deleted from V5 as separate requirements but the concepts were integrated into the definitions of ESP and Electronic Access Point (“EAP”).

Reference to prior version: (Part 1.1) CIP-005-4, R1

Change Rationale: (Part 1.1)

Explicitly clarifies that BES Cyber Assets connected via routable protocol must be in an Electronic Security Perimeter.

Reference to prior version: (Part 1.2) CIP-005-4, R1

Change Rationale: (Part 1.2)

Changed to refer to the defined term Electronic Access Point and BES Cyber System.

Reference to prior version: (Part 1.3) CIP-005-4, R2.1

Change Rationale: (Part 1.3)

Changed to refer to the defined term Electronic Access Point and to focus on the entity knowing and having a reason for what it allows through the EAP in both inbound and outbound directions.

Reference to prior version: (Part 1.4) CIP-005-4, R2.3

Change Rationale: (Part 1.4)

Added clarification that dial-up connectivity should perform authentication so that the BES Cyber System is not directly accessible with a phone number only.

Reference to prior version: (Part 1.5) CIP-005-4, R1

Change Rationale: (Part 1.5)

Per FERC Order No. 706, Paragraphs 496-503, ESPs need two distinct security measures such that the Cyber Assets do not lose all perimeter protection if one measure fails or is misconfigured. The Order makes clear this is not simple redundancy of firewalls, thus the SDT has decided to add the security measure of malicious traffic inspection as a requirement for these ESPs.

Requirement 1

CIP-005-5, Requirement R1 requires segmenting of BES Cyber Systems from other systems of differing trust levels by requiring controlled Electronic Access Points between the different trust zones. Electronic Security Perimeters are also used as a primary defense layer for some BES Cyber Systems that may not inherently have sufficient cyber security functionality, such as devices that lack authentication capability.

All applicable BES Cyber Systems that are connected to a network via a routable protocol must have a defined Electronic Security Perimeter (ESP). Even standalone networks that have no external connectivity to other networks must have a defined ESP. The ESP defines a zone of protection around the BES Cyber System, and it also provides clarity for entities to determine what systems or Cyber Assets are in scope and what requirements they must meet. The ESP is used in:

- Defining the scope of ‘Associated Protected Cyber Assets’ that must also meet certain CIP requirements.
- Defining the boundary in which all of the Cyber Assets must meet the requirements of the highest impact BES Cyber System that is in the zone (the ‘high water mark’).

The CIP Cyber Security Standards do not require network segmentation of BES Cyber Systems by impact classification. Many different impact classifications can be mixed within an ESP. However, all of the Cyber Assets and BES Cyber Systems within the ESP must be protected at the level of the highest impact BES Cyber System present in the ESP (i.e., the “high water mark”) where the term “Protected Cyber Assets” is used. The CIP Cyber Security Standards accomplish the “high water mark” by associating all other Cyber Assets within the ESP, even other BES Cyber Systems of lesser impact, as “Protected Cyber Assets” of the highest impact system in the ESP.

For example, if an ESP contains both a high impact BES Cyber System and a low impact BES Cyber System, then each Cyber Asset of the low impact BES Cyber System are “Associated Protected Cyber Assets” of the high impact BES Cyber System and must meet all the requirements with that designation in the applicability columns of the requirement tables.

If there is routable connectivity across the ESP into any Cyber Asset, then an Electronic Access Point (EAP) must control traffic into and out of the ESP.

The EAP should control both inbound and outbound traffic. The standard added outbound traffic control, as it is a prime indicator of compromise and a first level of defense against zero-day vulnerability-based attacks. If Cyber Assets within the ESP become compromised and attempt to communicate to unknown hosts outside the ESP (usually ‘command and control’ hosts on the Internet, or compromised ‘jump hosts’ within the Responsible Entity’s other networks acting as intermediaries), the EAPs should function as a first level of defense in stopping the exploit. The SDT’s intent is that the Responsible Entity knows what other Cyber Assets or ranges of addresses a BES Cyber System needs to communicate with and limits the communication to that known range. The SDT’s intent is not for Responsible Entities to document the inner workings of stateful firewalls, where connections initiated in one direction are allowed a return path. The intent is to know and document what systems can talk to what other systems or ranges of systems on the other side of the EAP, such that rouge connections can be detected and blocked.

This requirement applies only to communications for which access lists and ‘deny by default’ type requirements can be universally applied, which today are those that employ routable protocols. Direct serial, non-routable connections are not included as there is no perimeter or firewall type security that should be universally mandated across all entities and all serial communication situations. There is no firewall or perimeter capability for an RS232 cable run between two Cyber Assets. Without a clear ‘perimeter type’ security control that can be applied in practically every circumstance, such a requirement would mostly generate technical feasibility exceptions (“TFEs”) rather than increased security.

As for dial-up connectivity, the Standard Drafting Team's intent of this requirement is to prevent situations where only a phone number can establish direct connectivity to the BES Cyber Asset. If a dial-up modem is implemented in such a way that it simply answers the phone and connects the line to the BES Cyber Asset with no authentication of the calling party, it is a vulnerability to the BES Cyber System. The requirement calls for some form of authentication of the calling party before completing the connection to the BES Cyber System. If the dial-up connectivity is used for Interactive Remote Access, then Requirement R2 also applies.

The standard adds a requirement to detect malicious communications for Control Centers. This is in response to FERC Order No. 706, Paragraphs 496-503, where ESPs are required to have two distinct security measures such that the BES Cyber Systems do not lose all perimeter protection if one measure fails or is misconfigured. The Order makes clear that this is not simply redundancy of firewalls, thus the SDT has decided to add the security measure of malicious traffic inspection as a requirement for these ESPs.

Requirement R2

General Considerations for Requirement R2

Registered Entities use Interactive Remote Access to access Cyber Assets to support and maintain control systems networks. Discovery and announcement of vulnerabilities for remote access methods and technologies, that were previously thought secure and in use by a number of electric sector entities, necessitate changes to industry security control standards. Currently, no requirements are in effect for management of secure remote access to Cyber Assets to be afforded the NERC CIP protective measures. Inadequate safeguards for remote access can allow unauthorized access to the organization's network, with potentially serious consequences. Additional information is provided in ***Guidance for Secure Interactive Remote Access*** published by NERC in July 2011.

Remote access control procedures must provide adequate safeguards through robust identification, authentication and encryption techniques. Remote access to the organization's network and resources should only be permitted providing that authorized users are authenticated, data is encrypted across the network, and privileges are restricted.

The Intermediate System serves as a proxy for the remote user. Rather than allowing all the protocols the user might need to access Cyber Assets inside the Electronic Security Perimeter to traverse from the Electronic Security Perimeter to the remote computer, only the protocol required for remotely controlling the jump host is required. This allows the firewall rules to be much more restrictive than if the remote computer was allowed to connect to Cyber Assets within the Electronic Security Perimeter directly. The use of an Intermediate System also protects the Cyber Asset from vulnerabilities on the remote computer.

The use of multi-factor authentication provides an added layer of security. Passwords can be guessed, stolen, hijacked, found, or given away. They are subject to automated attacks including brute force attacks, in which possible passwords are tried until the password is found, or dictionary attacks, where words and word combinations are tested as possible passwords.

But if a password or PIN must be supplied along with a one-time password supplied by a token, a fingerprint, or some other factor, the password is of no value unless the other factor(s) used for authentication are acquired along with it.

Encryption is used to protect the data that is sent between the remote computer and the Intermediate System. Data encryption is important for anyone who wants or needs secure data transfer. Encryption is needed when there is a risk of unauthorized interception of transmissions on the communications link. This is especially important when using the Internet as the communication means.

Summary of Changes: This is a new requirement to continue the efforts of the Urgent Action team for Project 2010-15: Expedited Revisions to CIP-005-3.

Reference to prior version: (Part 2.1) New

Change Rationale: (Part 2.1)

This is a new requirement to continue the efforts of the Urgent Action team for Project 2010-15: Expedited Revisions to CIP-005-3.

Reference to prior version: (Part 2.2) CIP-007-5, R3.1

Change Rationale: (Part 2.2)

This is a new requirement to continue the efforts of the Urgent Action team for Project 2010-15: Expedited Revisions to CIP-005-3. The purpose of this part is to protect the confidentiality and integrity of each Interactive Remote Access session.

Reference to prior version: (Part 2.3) CIP-007-5, R3.2

Change Rationale: (Part 2.3)

This is a new requirement to continue the efforts of the Urgent Action team for Project 2010-15: Expedited Revisions to CIP-005-3. The multi-factor authentication methods are also the same as those identified in the Homeland Security Presidential Directive 12 (HSPD-12), issued August 12, 2007.

Requirement R3

Requirement Part 3.1 and Part 3.2 Vendor Remote Access Management for EACMS and PACS

The 2019-03 SDT added Requirement R3 to contain the requirements for all types of vendor remote access management for EACMS and PACS (i.e. system to system, user to system). EACMS were added based on FERC order 850 paragraph 5 where FERC ordered NERC to create a drafting team to add these devices. EACMS were added based on the risks FERC noted in paragraph 4, where a Department of Homeland Security Industrial Control System-Cyber Emergency Response Team (DHS ICS-CERT) said firewalls (normally defined as an EACMS) is the “first line of defense within an Industry Control System (ICS) network environment”. The compromise of those devices that control access management could provide an outsider the “keys to the front door” of the ESP where BES Cyber Systems reside. An intruder holding the “keys to the front door” could use those “keys” to enter the ESP or modify the access controls to allow others to bypass authorization.

In Requirement R3 Part 3.1 and Part 3.2, the word "connection" is the mechanism for a user or a system to interact with an EAMCS or PACS for the purpose of authenticating.

In Requirement R3 Part 3.1 and Part 3.2, the word "authenticate" is the mechanism for the EACMS or PACS to identify the user or device. This permits the EACMS or PACS to first perform its function to authenticate the user or device that is connecting, which in turn permits the entity to delineate or differentiate vendor-initiated connections from other remote access connections. This new proposed language is not prescriptive as to how authentication must occur to permit administrative and technical methods.

In Requirement R3 Part 3.2, the word "control" provides the entity flexibility to allow the vendor to reconnect under a specific set of conditions, established by the entity, where the reconnection is necessary to support critical operations of the entity. If the entity determines that they do not want to allow or does not need to allow a reconnection they can employ means to stop any reconnection.

The term *vendor(s)* as used in the standard is limited to those persons, companies, or other organizations with whom the Responsible Entity, or its affiliates, contract with to supply BES Cyber Systems and related services. It does not include other NERC registered entities providing reliability services (e.g., Balancing Authority or Reliability Coordinator services pursuant to NERC Reliability Standards). A *vendor*, as used in the standard, may include: (i) developers or manufacturers of information systems, system components, or information system services; (ii) product resellers; or (iii) system integrators.

Since remotely compromised PACS still require physical presence to exploit BES Cyber Systems, the SDT conducted extensive dialogue and considerations for the addition of PACS. The SDT concluded the risk posed to BES reliability by a compromised, misused, degraded, or unavailable PACS warranted their inclusion as an applicable Cyber Asset. Further, the inclusion of PACS:

1. addresses the Commission’s remaining concern stated in FERC Order No. 850 P 6. that, “...the exclusion of these components may leave a gap in the supply chain risk management Reliability Standards.”,
2. addresses the expectations of FERC Order No. 850 P 24. “...to direct that NERC evaluate the cybersecurity supply chain risks presented by PACS and PCAs in the study of cybersecurity supply chain risks directed by the NERC BOT in its resolutions of August 10, 2017.”, and

3. directly aligns with NERC’s recommendation to include PACS as documented in NERC’s final report on *“Cyber Security Supply Chain Risks”*¹.

NERC’s final report on *“Cyber Security Supply Chain Risks”*, states on page 4, “The NERC CIP Reliability Standards provide a risk-based, defense-in-depth approach to securing the BES against cyber and physical security threats.” PACS are intended to manage physical threats to BES Cyber Systems, thus protecting BES Cyber Systems against compromise that could lead to misoperation or instability in the BES.

Additionally, NERC states on page 15 of their final report on *“Cyber Security Supply Chain Risks”* that, “In addition, a threat actor must be physically present at the facility in order to exploit the vulnerability created by a compromised PACS system. A threat actor may also need to bypass several physical accesses or monitoring controls that have not been compromised in order to gain access.” While a cyber-compromised PACSs may not in and of itself represent an immediate 15-minute adverse impact to the reliability of the BES, it could demonstrate a threat Actor’s intention to gain fully unauthorized electronic access.

While other Reliability Standards mitigate certain security risks relating to PACS none address supply chain risk. Based on this analysis the SDT included PACS within the applicable section of both Requirement Parts 3.1 and 3.2.

An additional aspect of the NERC Supply Chain Report, the SDT considered was the risk associated with the access control vs. access monitoring functions of both EACMS and PACS. While both types of systems, under the current definitions, have various functional activities they perform, the NERC Supply Chain Report pointed to the increased risk of the access control function beyond the access monitoring function. The SDT considered limiting the scope of the requirements to only those access control functions, however chose to stay with the currently approved definition of both EACMS and PACS. The SDT concluded staying with approved definitions would introduce less confusion. Additionally, an attempt to change the EACMS and PACS definition was outside the 2019-03 SAR.

Entities may or may not allow remote access into any of its systems, (BES Cyber Systems, EACMS or PACS), however if remote access is allowed, options to determine remote access connection(s) and capability to disable remote access connection(s) is required.

¹ NERC, “Cyber Security Supply Chain Risks, Staff Report and Recommended Actions”, May 17, 2019.
[https://www.nerc.com/pa/comp/SupplyChainRiskMitigationProgramDL/NERC%20Supply%20Chain%20Final%20Report%20\(20190517\).pdf](https://www.nerc.com/pa/comp/SupplyChainRiskMitigationProgramDL/NERC%20Supply%20Chain%20Final%20Report%20(20190517).pdf)

Technical Rational for Reliability Standard CIP-005-6

This section contains a “cut and paste” of the Technical Rationale components of the former Guidelines and Technical Basis (GTB) as-is of from CIP-005-6 standard to preserve any historical references. Similarly, former GTB content providing compliance guidance can be found in a separate Implementation Guidance document for this standard.

Section 4 – Scope of Applicability of the CIP Cyber Security Standards

Section “4. Applicability” of the standards provides important information for Responsible Entities to determine the scope of the applicability of the CIP Cyber Security Requirements.

Section “4.1. Functional Entities” is a list of NERC functional entities to which the standard applies. If the entity is registered as one or more of the functional entities listed in Section 4.1, then the NERC CIP Cyber Security Standards apply. Note that there is a qualification in Section that restricts the applicability in the case of Distribution Providers to only those that own certain types of systems and equipment listed in 4.2.

Furthermore, Section “4.2. Facilities” defines the scope of the Facilities, systems, and equipment owned by the Responsible Entity, as qualified in Section 4.1, that is subject to the requirements of the standard. As specified in the exemption section 4.2.3.5, this standard does not apply to Responsible Entities that do not have High Impact or Medium Impact BES Cyber Systems under CIP-002-5’s categorization. In addition to the set of BES Facilities, Control Centers, and other systems and equipment, the list includes the set of systems and equipment owned by Distribution Providers. While the NERC Glossary term “Facilities” already includes the BES characteristic, the additional use of the term BES here is meant to reinforce the scope of applicability of these Facilities where it is used, especially in this applicability scoping section. This in effect sets the scope of Facilities, systems, and equipment that is subject to the standards.

Requirement R1:

CIP-005-5, Requirement R1 requires segmenting of BES Cyber Systems from other systems of differing trust levels by requiring controlled Electronic Access Points between the different trust zones. Electronic Security Perimeters are also used as a primary defense layer for some BES Cyber Systems that may not inherently have sufficient cyber security functionality, such as devices that lack authentication capability.

All applicable BES Cyber Systems that are connected to a network via a routable protocol must have a defined Electronic Security Perimeter (ESP). Even standalone networks that have no external connectivity to other networks must have a defined ESP. The ESP defines a zone of protection around the BES Cyber System, and it also provides clarity for entities to determine what systems or Cyber Assets are in scope and what requirements they must meet. The ESP is used in:

- Defining the scope of ‘Associated Protected Cyber Assets’ that must also meet certain CIP requirements.
- Defining the boundary in which all of the Cyber Assets must meet the requirements of the highest impact BES Cyber System that is in the zone (the ‘high water mark’).

The CIP Cyber Security Standards do not require network segmentation of BES Cyber Systems by impact classification. Many different impact classifications can be mixed within an ESP. However, all of the Cyber Assets and BES Cyber Systems within the ESP must be protected at the level of the highest impact BES Cyber System present in the ESP (i.e., the “high water mark”) where the term “Protected Cyber Assets” is used. The CIP Cyber Security Standards accomplish the “high water mark” by associating all other Cyber Assets within the ESP, even other BES Cyber Systems of lesser impact, as “Protected Cyber Assets” of the highest impact system in the ESP.

For example, if an ESP contains both a high impact BES Cyber System and a low impact BES Cyber System, each Cyber Asset of the low impact BES Cyber System is an “Associated Protected Cyber Asset” of the high impact BES Cyber System and must meet all requirements with that designation in the applicability columns of the requirement tables.

If there is routable connectivity across the ESP into any Cyber Asset, then an Electronic Access Point (EAP) must control traffic into and out of the ESP.

Responsible Entities should know what traffic needs to cross an EAP and document those reasons to ensure the EAPs limit the traffic to only those known communication needs. These include, but are not limited to, communications needed for normal operations, emergency operations, support, maintenance, and troubleshooting.

The EAP

The EAP should control both inbound and outbound traffic. The standard added outbound traffic control, as it is a prime indicator of compromise and a first level of defense against zero day vulnerability-based attacks. If Cyber Assets within the ESP become compromised and attempt to communicate to unknown hosts outside the ESP (usually ‘command and control’ hosts on the Internet, or compromised ‘jump hosts’ within the Responsible Entity’s other networks acting as intermediaries), the EAPs should function as a first level of defense in stopping the exploit. This does not limit the Responsible Entity from controlling outbound traffic at the level of granularity that it deems appropriate, and large ranges of internal addresses may be allowed. The SDT’s intent is that the Responsible Entity knows what other Cyber Assets or ranges of addresses a BES Cyber System needs to communicate with and limits the communications to that known range. For example, most BES Cyber Systems within a Responsible Entity should not have the ability to communicate through an EAP to any network address in the world, but should probably be at least limited to the address space of the Responsible Entity, and preferably to individual subnet ranges or individual hosts within the Responsible Entity’s address space. The SDT’s intent is not for Responsible Entities to document the inner workings of stateful firewalls, where connections initiated in one direction are allowed a return path. The intent is to know and document what systems can talk to what other systems or ranges of systems on the other side of the EAP, such that rogue connections can be detected and blocked.

This requirement applies only to communications for which access lists and ‘deny by default’ type requirements can be universally applied, which today are those that employ routable protocols. Direct serial, non-routable connections are not included as there is no perimeter or firewall type security that should be universally mandated across all entities and all serial communication situations. There is no firewall or perimeter capability for an RS232 cable run between two Cyber Assets. Without a clear ‘perimeter type’ security control that can be applied in practically every circumstance, such a requirement would mostly generate technical feasibility exceptions (“TFEs”) rather than increased security.

As for dial-up connectivity, the Standard Drafting Team’s intent of this requirement is to prevent situations where only a phone number can establish direct connectivity to the BES Cyber Asset. If a dial-up modem is implemented in such a way that it simply answers the phone and connects the line to the BES Cyber Asset with no authentication of the calling party, it is a vulnerability to the BES Cyber System. The requirement calls for some form of authentication of the calling party before completing the connection to the BES Cyber System. If the dial-up connectivity is used for Interactive Remote Access, then Requirement R2 also applies.

The standard adds a requirement to detect malicious communications for Control Centers. This is in response to FERC Order No. 706, Paragraphs 496-503, where ESPs are required to have two distinct security measures such that the BES Cyber Systems do not lose all perimeter protection if one measure fails or is misconfigured. The Order makes clear that this is not simply redundancy of firewalls, thus the SDT has decided to add the security measure of malicious traffic inspection as a requirement for these ESPs.

Requirement R2:

See Secure Remote Access Reference Document (see remote access alert).

Rationale:

During the development of this standard, references to prior versions of the CIP standards and rationale for the requirements and their parts were embedded within the standard. Upon BOT approval, that information was moved to this section.

Rationale for R1:

The Electronic Security Perimeter (“ESP”) serves to control traffic at the external electronic boundary of the BES Cyber System. It provides a first layer of defense for network based attacks as it limits reconnaissance of targets, restricts and prohibits traffic to a specified rule set, and assists in containing any successful attacks.

Summary of Changes: CIP-005, Requirement R1 has taken more of a focus on the discrete Electronic Access Points, rather than the logical “perimeter.”

CIP-005 (V1 through V4), Requirement R1.2 has been deleted from V5. This requirement was definitional in nature and used to bring dial-up modems using non-routable protocols into the scope of CIP-005. The non-routable protocol exclusion no longer exists as a blanket CIP-002 filter for applicability in V5, therefore there is no need for this requirement.

CIP-005 (V1 through V4), Requirement R1.1 and R1.3 were also definitional in nature and have been deleted from V5 as separate requirements but the concepts were integrated into the definitions of ESP and Electronic Access Point (“EAP”).

Reference to prior version: (Part 1.1) CIP-005-4, R1

Change Rationale: (Part 1.1)

Explicitly clarifies that BES Cyber Assets connected via routable protocol must be in an Electronic Security Perimeter.

Reference to prior version: (Part 1.2) CIP-005-4, R1

Change Rationale: (Part 1.2)

Changed to refer to the defined term Electronic Access Point and BES Cyber System.

Reference to prior version: (Part 1.3) CIP-005-4, R2.1

Change Rationale: (Part 1.3)

Changed to refer to the defined term Electronic Access Point and to focus on the entity knowing and having a reason for what it allows through the EAP in both inbound and outbound directions.

Reference to prior version: (Part 1.4) CIP-005-4, R2.3

Change Rationale: (Part 1.4)

Added clarification that dial-up connectivity should perform authentication so that the BES Cyber System is not directly accessible with a phone number only.

Reference to prior version: (Part 1.5) CIP-005-4, R1

Change Rationale: (Part 1.5)

Per FERC Order No. 706, Paragraphs 496-503, ESPs need two distinct security measures such that the Cyber Assets do not lose all perimeter protection if one measure fails or is misconfigured. The Order makes clear this is not simple redundancy of firewalls, thus the SDT has decided to add the security measure of malicious traffic inspection as a requirement for these ESPs.

Rationale for R2:

Registered Entities use Interactive Remote Access to access Cyber Assets to support and maintain control systems networks. Discovery and announcement of vulnerabilities for remote access methods and technologies, that were previously thought secure and in use by a number of electric sector entities, necessitate changes to industry security control standards. Currently, no requirements are in effect for management of secure remote access to Cyber Assets to be afforded the NERC CIP protective measures. Inadequate safeguards for remote access can allow unauthorized access to the organization's network, with potentially serious consequences. Additional information is provided in ***Guidance for Secure Interactive Remote Access*** published by NERC in July 2011.

Remote access control procedures must provide adequate safeguards through robust identification, authentication and encryption techniques. Remote access to the organization's network and resources will only be permitted providing that authorized users are authenticated, data is encrypted across the network, and privileges are restricted.

The Intermediate System serves as a proxy for the remote user. Rather than allowing all the protocols the user might need to access Cyber Assets inside the Electronic Security Perimeter to traverse from the Electronic Security Perimeter to the remote computer, only the protocol required for remotely controlling the jump host is required. This allows the firewall rules to be much more restrictive than if the remote computer was allowed to connect to Cyber Assets within the Electronic Security Perimeter directly. The use of an Intermediate System also protects the Cyber Asset from vulnerabilities on the remote computer.

The use of multi-factor authentication provides an added layer of security. Passwords can be guessed, stolen, hijacked, found, or given away. They are subject to automated attacks including brute force attacks, in which possible passwords are tried until the password is found, or dictionary attacks, where words and word combinations are tested as possible passwords.

But if a password or PIN must be supplied along with a one-time password supplied by a token, a fingerprint, or some other factor, the password is of no value unless the other factor(s) used for authentication are acquired along with it.

Encryption is used to protect the data that is sent between the remote computer and the Intermediate System. Data encryption is important for anyone who wants or needs secure data transfer. Encryption is needed when there is a risk of unauthorized interception of transmissions on the communications link. This is especially important when using the Internet as the communication means.

Summary of Changes: This is a new requirement to continue the efforts of the Urgent Action team for Project 2010-15: Expedited Revisions to CIP-005-3.

Reference to prior version: (Part 2.1) New

Change Rationale: (Part 2.1)

This is a new requirement to continue the efforts of the Urgent Action team for Project 2010-15: Expedited Revisions to CIP-005-3.

Reference to prior version: (Part 2.2) CIP-007-5, R3.1

Change Rationale: (Part 2.2)

This is a new requirement to continue the efforts of the Urgent Action team for Project 2010-15: Expedited Revisions to CIP-005-3. The purpose of this part is to protect the confidentiality and integrity of each Interactive Remote Access session.

Reference to prior version: (Part 2.3) CIP-007-5, R3.2

Change Rationale: (Part 2.3)

This is a new requirement to continue the efforts of the Urgent Action team for Project 2010-15: Expedited Revisions to CIP-005-3. The multi-factor authentication methods are also the same as those identified in the Homeland Security Presidential Directive 12 (HSPD-12), issued August 12, 2007.

Change Rationale: (Part 2.4 and 2.5)

Requirement R2 Parts 2.4 and 2.5 addresses Order No. 829 directives for controls on vendor-initiated remote access to BES Cyber Systems covering both user-initiated and machine-to machine vendor remote access (P. 51). The objective is to mitigate potential risks of a compromise at a vendor during an active remote access session with a Responsible Entity from impacting the BES.

The objective of Requirement R2 Part 2.4 is for entities to have visibility of active vendor remote access sessions (including Interactive Remote Access and system-to-system remote access) that are taking place on their system. This scope covers all remote access sessions with vendors. The obligation in Part 2.4 requires entities to have a method to determine active vendor remote access sessions. While not required, a solution that identifies all active remote access sessions, regardless of whether they originate from a vendor, would meet the intent of this requirement. The objective of Requirement R2 Part 2.5 is for entities to have the ability to disable active remote access sessions in the event of a system breach as specified in Order No. 829 (P. 52).