

## Consideration of Issues and Directives

### Project 2016-02 Modifications to CIP Standards

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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) resolved the ambiguity identified by the Commission surrounding the term “direct” within the definition of Low Impact External Routable Connectivity (LERC) by retiring the term and incorporating the LERC concepts within the requirement language. Retiring the 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. In changing the approach, the SDT avoids overemphasis on identifying LERC and focuses emphasis on the security objective in the requirements.</p> <p>Therefore, for those assets containing low impact BES Cyber Systems as identified in CIP-002, 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</p>

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		<p>permitting “only necessary inbound and outbound electronic access as determined by the Responsible Entity for any communications that are:</p> <ul style="list-style-type: none"> <li>i. between a low impact BES Cyber System(s) and a Cyber Asset(s) outside the asset containing low impact BES Cyber system(s);</li> <li>ii. using a routable protocol when entering or leaving the asset containing the low impact BES Cyber System(s); and,</li> <li>iii. not used for time-sensitive protection or control functions between intelligent electronic devices (e.g. communications using protocol IEC TR-61850-90-5 R-GOOSE).”</li> </ul> <p>Additionally, the SDT updated and incorporated the exclusion language from the approved LERC definition into the requirement language and expanded the Guidelines and Technical Basis with numerous examples of electronic access control concepts that accomplish the defined security objective.</p> <p>Given the proposed retirement 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>