NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

When completed, email this form to:
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For questions about this form or for assistance in completing the form, call Maureen Long at 813-468-5998.

Note: an Interpretation cannot be used to change a standard.

Request for an Interpretation of a Reliability Standard

Date submitted: 12-28-2011

Contact information for person requesting the interpretation:

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Identify the standard that needs clarification:

Standard Number (include version number): CIP-007-3

(example: PRC-001-1)

Standard Title: Cyber Security — Systems Security Management

Identify specifically what requirement needs clarification:

Requirement Number and Text of Requirement:

R5. Account Management — The Responsible Entity shall establish, implement, and document technical and procedural controls that enforce access authentication of, and accountability for, all user activity, and that minimize the risk of unauthorized system access.

R5.3. At a minimum, the Responsible Entity shall require and use passwords, subject to the following, as technically feasible:
R5.3.1. Each password shall be a minimum of six characters.
R5.3.2. Each password shall consist of a combination of alpha, numeric, and “special” characters.
R5.3.3. Each password shall be changed at least annually, or more frequently based on risk.

Clarification needed:

ITC respectfully requests an interpretation regarding the following:

1. Does each sub-requirement, including R5.3, of R5 require that both "technical and procedural controls" be utilized?

2. Do "technical controls", utilized in the context of R5.3, mean that each individual cyber asset device within an ESP has to automatically enforce each of the three R5.3 sub-requirements? The three bullets below are part of this question; they are examples if this is interpreted to be true.

- R5.3.1. Each password shall be a minimum of six characters. Each individual cyber asset device within an ESP has to automatically reject any password that does not conform to a minimum of six characters.
- R5.3.2. Each password shall consist of a combination of alpha, numeric, and "special" characters. Each individual cyber asset device within an ESP has to automatically reject any password that does not conform to a combination of alpha, numeric and "special" characters.
- R5.3.3. Each password shall be changed at least annually, or more frequently based on risk. Each individual cyber asset device within an ESP has to automatically force passwords to be changed at least annually or at a specified interval based on risk.

Identify the material impact associated with this interpretation:

Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.

If it is interpreted that R5.3 requires "technical controls" that automatically enforce password requirements, then there will be a need for entities to file a significant number of additional TFEs. The majority of devices used in the industry, while allowing passwords that meet all of the R5.3 sub-requirements, are not able to automatically enforce the requirements of R5.3.1, R5.3.2 and R5.3.3. In addition, it is expected the TFEs submitted for this requirement will have to be kept in place for a long period of time until device manufacturers create products that can enforce R5.3.1, R5.3.2 and R5.3.3.

A correct interpretation is needed for entities to determine whether existing cyber assets within ESPs are fully compliant with this requirement to avoid penalties associated with noncompliance.