

Meeting Notes

Project 2023-03 Internal Network Security Monitoring

April 19, 2024

Conference Call

Administrative

1. Introductions

The meeting was brought to order by the Chair at 11:02 a.m. Eastern on Friday, April 19, 2024.

2. Determination of Quorum

The rule for NERC Drafting Team states that a quorum requires two-thirds of the voting members of the DT. Quorum was achieved as 12 of 14 total members were present.

3. NERC Antitrust Compliance Guidelines and Public Announcement

NERC Antitrust Compliance Guidelines and public announcement were reviewed by Laura Anderson. There were no questions raised.

Agenda

1. Discussion

- a. Outreach – Laura Anderson, NERC staff:
 - A lot of outreach has been done on this project.
 - As a result of this heavy outreach, industry is kept aware of where this project is and next steps.
 - The DT has been able to field questions from industry.
 - DT members have been able to bring back comments and suggestions to the DT for consideration during development.
- b. Additional ballot results – Thad Ness, Chair and Laura Anderson, NERC staff:
 - Excellent work by the DT; achieved above the two-thirds threshold for approval and for quorum.
 - Big accomplishment resulting from heavy time commitments of DT and observers.
 - Did not meet the 85% threshold needed to conclude the project; will proceed to final ballot.
- c. Next steps – Laura Anderson, NERC staff:
 - Final ballot documents must be submitted by Tuesday, April 23.
 - Final ballot is scheduled for April 24 - 30, 2024.
 - If substantive revisions need to be made to the project documents, then final ballot would be cancelled and an additional comment period with ballot would need to be scheduled.
 - If final ballot is passed, the project will be presented to the Board of Trustees at their May 2024 meeting for adoption of the following Project 2023-03 documents:
 - Proposed Reliability Standard CIP-015-1;
 - Implementation Plan; and
 - VRF/VSL document.
- d. Comments received
 - General themes – Thad Ness, Chair
 - 55 unique responses received.
 - For Q1, adding the GO back in:
 - No “no” boxes checked; all responses were supportive.
 - For Q2, Requirement R1 and its Parts and Measure:
 - R1 is the heart of the INSM program and has three subparts to implement data collection feeds, to detect, and to evaluate.

- Inconsistencies in “data feeds” and R2’s “data collected.”
 - Received feedback about the Technical Rationale - some entities are still struggling with the line on this, and the DT thought it would be better to provide guidance in the TR.
- Comments received requesting clarification or definition for risk-based rationale.
- Comments received requesting definition for anomalous activity:
 - The FAQ and Technical Rationale both address anomalous activity.
 - The DT did not take the position to define anomalous activity, as it is event based.
 - Implementation Guidance may be a good place for addressing anomalous activity:
 - Implementation guidance is outside of the scope of this project and would be a group of industry pre-approved to provide that.
- Comments received requesting to add CIP Exceptional Circumstance to Requirement R1.
- Comments received to change data “feeds” to “points:”
 - The DT had decided that data points can mean a lot in a SCADA environment.
- For Q3, Requirement R2 and Measure M2:
 - Risk-based definition requested from commenters.
 - Comments made requesting the order of Requirements R2 and R3 be re-ordered.
- For Q4, Requirement R3 and Measure M3:
 - Comments made requesting the order of Requirements R2 and R3 be re-ordered.
 - Compliance concerns regarding not keeping the data:
 - Can refer to Section C of proposed Reliability Standard CIP-015-1.
 - This is about retaining information to operationally fulfill these activities.
- For Q5, Additional Comments:
 - Feedback that the Note provides an example of PCAP, and it is not an explicit requirement, so may be creating an implied requirement.
 - Suggested that CMEP Practice Guide reference be deleted from the Technical Rationale.
- Question 1 – adding Generator Owner to Section 4.1.4 – Thad Ness, Chair
 - The word “Each” was added at the beginning of each requirement to align with the CIP family of standards.

- Suggested to remove “collected” from Requirement R2:
 - It was discussed that this change would create a broadened meaning.
 - “Collected” was specifically calling it stored data.
 - The DT decided against this change.
- Methods and processes:
 - There was a comment about breaking these up.
 - Saying both was intended to provide clarity:
 - The DT intended “processes” as a broader scope with the “methods” being the specific techniques.
 - The DT decided against breaking these up.
- Risk-based rationale:
 - The DT has been deliberate to be objective based:
 - Many commenters supported the flexibility.
 - The DT made no changes to the risk-based language.
- Data feeds v. Data locations v. Data points:
 - The DT did not find a compelling reason to make a change.
 - There is context for this:
 - The DT had decided on data feeds in the context of INSM and not anything else.
- Comments received to define anomalous.
 - The DT has declined to define anomalous, as the DT’s intent of the word anomalous is well-defined in Webster’s Dictionary.
 - The DT including descriptors and guidance for anomalous in both the FAQ document and the Technical Rationale.
- Question 2 – Requirement R1, its Parts and Measure – Thad Ness, Chair
 - Comments made requesting the order of Requirements R2 and R3 be re-ordered.
- Question 3 – Requirement R2 and Measure M2 – Thad Ness, Chair
 - Comments made requesting the order of Requirements R2 and R3 be re-ordered.
 - Compliance concerns regarding not keeping the data:
 - Can refer to Section C of proposed Reliability Standard CIP-015-1.
 - This is about retaining information to operationally fulfill these activities.
- Question 4 – Requirement R3 and Measure M3 – Thad Ness, Chair

- Comments made requesting the order of Requirements R2 and R3 be re-ordered.
- Question 5 – Additional Comments – Thad Ness, Chair
 - Note following Requirement R3 updated to delete the example of PCAP and the word “detailed.”
 - Suggested that CMEP Practice Guide reference be deleted from the Technical Rationale.
 - The Technical Rationale was updated to delete this reference.
 - Implementation Plan suggested longer for substations.
 - Industry overall supported the Implementation Plan as written, so the DT decided to make no change to the Implementation timeframes.

2. Action Item Review

- a. Consideration of Comments:
 - DT to review and have discussions during April 21, 2024 DT meeting.
 - Laura Anderson, NERC staff, to populate the responses to comments received for DT to review.
- b. Technical Rationale:
 - Mark Johnson-Barbier, Member, to update as revisions are made to proposed Reliability Standard CIP-015-1 and as comments received related to Technical Rationale are vetted.
- c. Proposed Reliability Standard CIP-015-1:
 - Laura Anderson, NERC staff, to revise as DT makes decisions during the vetting of comments received.
- d. Implementation Plan:
 - Laura Anderson, NERC staff, to revise as DT makes decisions during the vetting of comments received.
- e. VRF/VSL Justification Document:
 - Laura Anderson, NERC staff, to revise as DT makes decisions during the vetting of comments received.
- f. FAQ Document:
 - Alan Kloster, Member, to revise as DT makes decisions during the vetting of comments received.

3. Future meeting(s)

- a. April 22, 2024 – WebEx

4. Adjourn

The meeting adjourned at 3:38 p.m. Eastern on April 19, 2024.

Attendance				
Name	Company	Member/ Observer	In-person (Y/N)	Conference Call (Y/N)
Thad Ness, Chair	NextEra Energy	Member	N	Y
Valerie Ney, Vice Chair	FirstEnergy Corporation	Member	N	Y
Joseph Jimenez	Duke Energy	Member	N	Y
Dan Toth	ATC	Member	N	Y
Mark Johnson-Barbier	Salt River Project	Member	N	Y
Joseph Bradley	Ameren	Member	N	Y
Erin Wilson	New Brunswick Power	Member	N	N
Robert Rinish	PPL Electric Utilities	Member	N	Y
Aaron Williams	Southern Company	Member	N	N
Eric Rupp	Great River Energy	Member	N	Y
Alan Kloster	Evergy, Inc.	Member	N	Y
Darcy Guenette	Ontario Power Generation	Member	N	Y
Tim McDonald	PG&E	Member	N	Y
David Crim	MISO	Member	N	Y
Ruida Shu, PMOS Liaison	NPCC	PMOS	N	Y
Laura Anderson, NERC staff	NERC	NERC Staff	N	Y
Sarah Crawford, NERC Legal	NERC	NERC Staff	N	Y