Unofficial Comment Form

Project 2023-03 Internal Network Security Monitoring (INSM)

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Project 2023-03 Internal Network Security Monitoring** Standard Authorization Request (SAR) by **8 p.m. Eastern, Friday, May 5, 2023.**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2023-03-INSM.aspx). If you have questions, contact Senior Standards Developer, Laura Anderson (via email), or at 404-782-1870.

## Background Information

The proposed project will address the Federal Energy Regulatory Commission (FERC) issued Order No. 887[[1]](#footnote-1) directing NERC to develop requirements within the Critical Infrastructure Protection (CIP)

Reliability Standards for INSM of all high impact BES Cyber Systems and medium impact BES Cyber Systems with External Routable Connectivity (ERC). INSM permits entities to monitor traffic once it is within a trusted zone, such as the Electronic Security Perimeter, to detect intrusions or malicious activity.

More specifically, Order No. 887 directs NERC to develop Reliability Standards requirements that are “forward-looking, objective-based”[[2]](#footnote-2) and address three security objectives outlined in Order No. 887. FERC directed NERC to submit these revisions for approval by July 9, 2024.

Order No. 887 also directed NERC to conduct a study on the risks of lack of INSM for medium impact BES Cyber Systems without ERC, all low impact BES Cyber Systems, and on the challenges and solutions for implementing INSM for those BES Cyber Systems. NERC is conducting the study, which is to be filed with

FERC by January 18, 2024.

**Questions**

1. Do you agree with the proposed scope as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope, please provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

1. Provide any additional comments for the SAR drafting team to consider, if desired.

 Comments:

1. Internal Network Security Monitoring for High and Medium Impact Bulk electric System Cyber Systems, Order No. 887, 182 FERC ¶ 61,021 (Jan. 19, 2023). [↑](#footnote-ref-1)
2. Order No. 87 at P 5. [↑](#footnote-ref-2)