

Consideration of Issues and Directives

Project 2016-02 Modifications to CIP Standards

| Project 2016-02 Modifications to CIP Standards | | |
|--|--|---|
| 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) revised resolved the ambiguity identified by the Commission surrounding the term “direct” within the definition of the term Low Impact External Routable Connectivity to resolve the ambiguity surrounding the term “direct” identified by the Commission. In doing so, (LERC) by retiring the term and incorporating the SDT changed LERC concepts within the term to Low Impact External Routable Communication (LERC) and simplified requirement language. Retiring the definition so that LERC is an attribute of an asset containing low impact BES Cyber Systems. As revised, LERC exists where there is routable protocol communication that crosses the asset boundary without regard to whether ‘direct’ or ‘indirect’ access may occur. The revised 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</p> |

Project 2016-02 Modifications to CIP Standards

| Issue or Directive | Source | Consideration of Issue or Directive |
|--------------------|--------|---|
| | | <p>implied through the definition. <u>In changing the approach, the SDT avoids overemphasis on identifying LERC and focuses emphasis on the security objective in the requirements.</u></p> <p>Therefore, for those assets containing low impact BES Cyber Systems that have LERCs 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 permitting “only necessary <u>inbound and outbound</u> electronic access to <u>as determined by the Responsible Entity for any communications that are:</u></p> <ul style="list-style-type: none"> <u>i. between a low impact BES Cyber System(s) and a Cyber Asset(s) outside the asset containing low impact BES Cyber system(s);</u> <u>ii. using a routable protocol when entering or leaving the asset containing the low impact BES Cyber System(s); and,</u> <u>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).”</u> <p>Additionally, the SDT <u>updated and incorporated the exclusion language from the approved LERC definition into the requirement language and</u> expanded the Guidelines and Technical Basis with numerous examples of electronic access</p> |

Project 2016-02 Modifications to CIP Standards

| Issue or Directive | Source | Consideration of Issue or Directive |
|--------------------|--------|---|
| | | <p>control concepts that accomplish this <u>the defined security</u> objective.</p> <p>Given the modified definition <u>proposed retirement</u> 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> |