

Meeting Notes

Project 2016-02 Modifications to CIP Standards Drafting Team

April 19, 2022

Review NERC Antitrust Compliance Guidelines and Public Announcement

Jordan Mallory reviewed the NERC Antitrust Compliance Guidelines and noted that the meeting was public.

Roll Call

J. Mallory called roll. See page two.

Review Comments Received

Question one themes:

- Request for Implementation Guidance (IG) related to Shared Cyber Infrastructure (SCI)
- SCI and other forms should be included in CIP-002
- Outside of standards authorization request (SAR)
 - Cyber Asset expands Scope to non-Virtual assets that was not previously included (include SAN)
- Confusion regarding how to treat clustered vs standalone
- Clarification for dormant vs non-dormant
- Clarification for where Virtual Cyber Assets (VCAs) can be hosted
- SCI should not be limited to only mixed trust scenarios
- Clarification for granularity of affinity controls
- Treatment of computational workload sharing systems
- Request for further clarification of SCI
- Electronic Access Controls or Monitoring System (EACMS) with multiple impact ratings appear to require separation
- Complexity introduced by SCI increases compliance risk
- Consensus on treatment of virtualized assets has not been established
- Confusion if re-categorization of all assets is needed
- Fiber channel switches or NAS configurations? How are the transport networks to be treated?
- Clarification on treatment of SCI in CIP-006/008

- More evidence required at Lows for SCI
- Treatment of Cluster vs LPARs partitions
- SCI that hosts only ancillary systems like EACMS, Physical Access Control Systems (PACS) have a different risk than ones that host BES Cyber System (BCS)
- High-water marking is easier than SCI, misconfigured hypervisors
- Write a separate standard for virtualization

Question two themes:

- Request for IG related to Electronic Security Perimeter (ESP)/ Electronic Access Point (EAP)
- ESP has redundant characteristics
- Clarification for treatment of host-based firewalls
 - Reinstated ESP definition but refocused on to/from BCS
 - Add one or more to EAP definition
- Zero Trust is not included in the ESP/EAP definition
- Desire to implement boundary and granular access control
- The existing ESP definition is adequate
 - Added option for Zero Trust scenarios
 - Left the existing language static for backward compatibility
- Confusion about the use of "Cyber Asset Interface" (existing language)
- Confusion about EAP relationship to requirement language
- ESP becomes confusing without inside/outside concept
- EAPs appear to be required in the second part of the ESP definition
- EAP does not include PCA
- Potentially include PCA in the EAP definition

Question three themes:

- Change ESP to EAP in External Routable Connectivity (ERC) Definition
 - Missing grouping concept; interactions with IRA
- Keep existing ERC definition
 - Inside/outside difficult in ZT
 - Needs updates to Cyber Asset (like adding VCA)

- Create separate definition for ERC in Zero Trust
 - Backward compatibility
- Create definition for Zero Trust
- Traffic between ESPs would be included in the ERC definition

Question four themes:

- IRA does not originate from an Intermediate system "that is not an intermediate system"
- Consistency between lead-in on 2.1 and 2.2 (For all IRA, vs permit authorized)
- IRA must initiate from external to ESP; Concerns about management systems treated as EACMS outside the ESP.
- System-to-system missing from IRA
- Style Guide
- IRA required for all SCI?
- Call for CIP-015
- Too much change
- IRA too broad; includes serial, may not be able to control outcome
- Request for IG
- Add "of a BCS" to the end of the 3rd bullet in IRA
- Clarification for user initiated (Scheduled task vs human on keys)
- Included definitions in the standard

Future meeting(s)

- April 21, 26, and 28, 2022

Adjourn

The meeting adjourned at 3:02 p.m. Eastern on April 19, 2022.

Attendance

Name	Company	Member/ Observer	Straw Vote (X)	Conference Call/Web (Y/N)
Jay Cribb	Southern Company	Co-Chair		Y
Matthew Hyatt	Georgia System Operations Corporation	Co-Chair		N
Jake Brown	ERCOT	Member		Y
Norman Dang	Independent Electricity System Operator of Ontario	Member		Y
Robert Garcia	SPP, Inc.	Member		N
Scott Klauminzer	Tacoma Public Utilities	Member		N
Sharon Koller	ATC, LLC	Member		N
Heather Morgan	EDP Renewables	Member		N
Mark Riley	Calpine	Member		N
Jordan Mallory	NERC	NERC Staff		Y
Marisa Hecht	NERC	NERC Staff		Y
Lonnie Ratliff	NERC	NERC Staff		N
Daniel Bogle	NERC	NERC Staff		Y
Mike Keane	FERC	FERC Staff		Y
Jorge Reig	FERC	FERC Staff		N
Jenn Rinaldi	FERC	FERC Staff		Y
Ken Lanehome	Bonneville Power Administration	PMOS		Y
Kirk Rosener	CPS Energy	PMOS		N
Jay Cribb	Southern Company	Co-Chair		Y