Standard Application Guide for CIP-002-5.1

MRO CIP Subject Matter Expert Team

MRO CIP V5 Workshop
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MRO CIP Subject Matter Expert Team Members

Sharon Koller, Chair
American Transmission Company

Marc Child, Vice Chair
Great River Energy

Ron Bender
Nebraska Public Power District

Marie Knox
MISO

Jesse Consolatti
Alliant Energy

Bruce MacKenzie
Saskatchewan Power

MRO Standards Committee Members

Robert Thompson, Chair
Xcel Energy

Wayne Guttormson
Saskatchewan Power, Vice Chair

David Rudolph
Basin Electric Power Cooperative

Mark Buchholz
Western Area Power Administration

George Brown
Acciona Energy

Todd Komplin
WPPI Energy

Joe Knight
Great River Energy

Michael Moltane
ITC Holdings

Andrew Pusztai
American Transmission Company

Lori Frisk
Minnesota Power

Background

- **<u>April 2013</u>: MRO Standards Committee (MRO SC) approved a request for a Standard Application Guide (SAG) for NERC Reliability Standard CIP-002-5.1**
- **<u>September 2013-December 2014</u>: The CIP Subject Matter Expert Team (SMET) developed the CIP-002-5.1 SAG**
  - Underwent a cycle of technical reviews by NERC, MRO Risk Assessment and Mitigation, and MRO SC
- **<u>December 2014</u>: The CIP-002-5.1 SAG approved by the MRO SC, presented to the MRO Board of Directors and published**

Purpose:

- **This presentation is intended to provide guidance to Registered Entities on how to use the SAG and companion documents**

- **In this presentation you will learn about the process to:**
  - Apply the Attachment 1 Criteria to categorize BES Assets and BES Facilities
  - Evaluate Cyber Assets to determine impact rating of BES Cyber Systems
  - Examples, important considerations, and varied approaches/interpretations that may affect the approach a given entity chooses
  - How the companion documents can help

Focus: Preparing the industry for change

- **CIP-002-5.1 Cyber Security – BES Cyber System Categorization Standards**
  - Bulk Electric System (BES) Assets and Facilities

CIP Version 3		CIP Version 5
Risk-based Assessment Methodology	→	Application of Impact Rating Criteria
Critical Assets	→	High, Medium, or Low BES Facilities & Assets

  - BES Cyber Assets and Systems

CIP Version 3		CIP Version 5
Critical Cyber Assets	→	Impact-Rating BES Cyber Systems

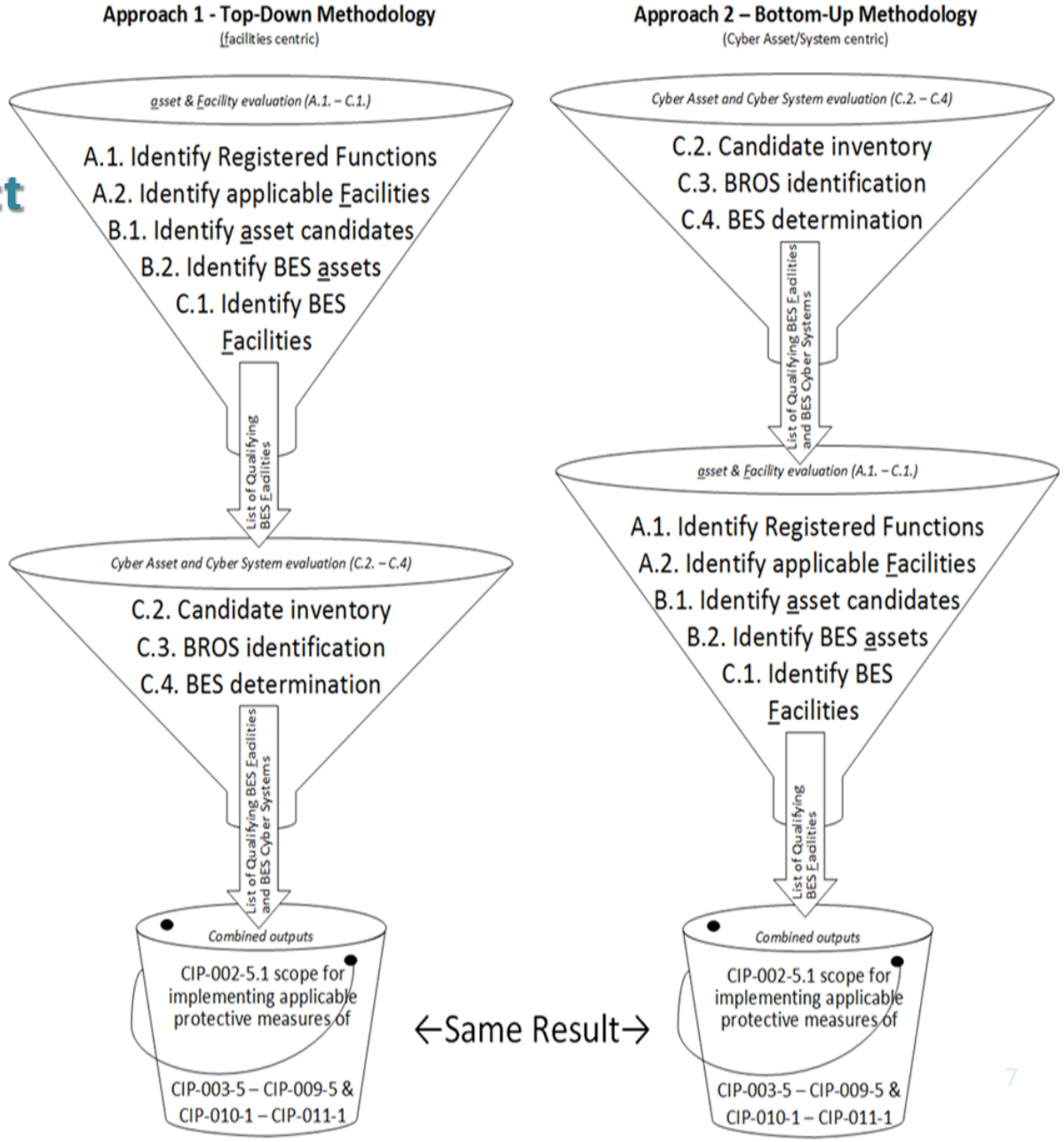
GOAL:

Take the mystery out of a complex subject

- **Two approaches (flexibility)**
  1. Facility centric (recommended)
  2. Cyber Asset/System centric

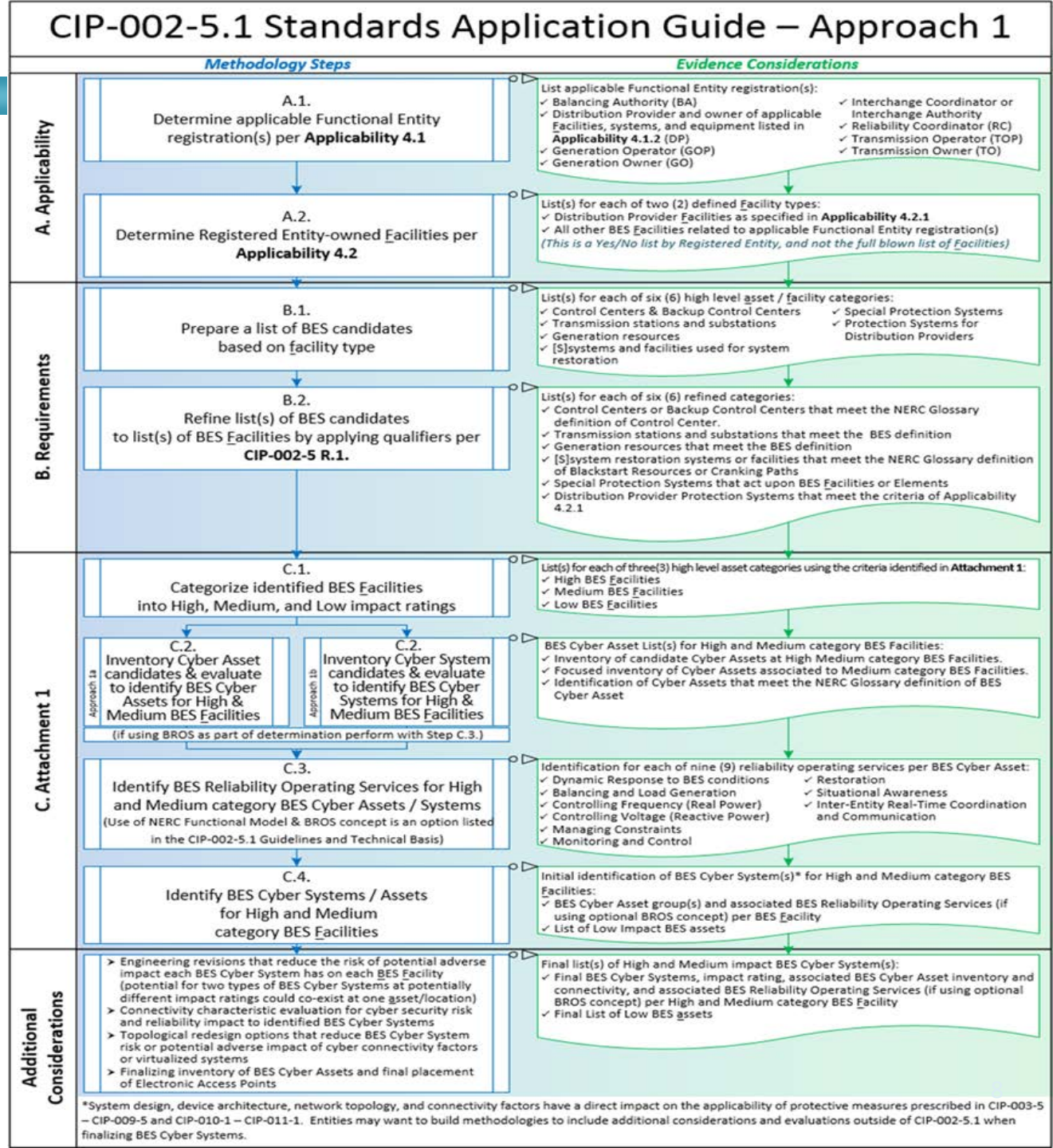
- **Filters and buckets (simplicity)**

Applicable BES Assets
Qualifying BES Facilities
\+ BES Cyber Assets & Systems
= CIP-002-5.1 Scope



Approach 1:

- **Provide Step-by-Step Instruction**
  - Methodology (doing it)
  - Evidence (proving it)
- **Break it down visually: Usability**
  A. Applicability
  B. Requirements
  C. Attachment 1
  D. Additional Considerations
- **Support with narratives, tips, and examples**



SMET Goal = Comprehensive content

- **Explain use of defined terms vs. SMET terms or interpretations**
- **Requirements / Attachment 1 Analysis and Interpretation**
  - Interpretations on “associated”
- **Narrative to guide through details of steps A, B and C**
- **Visual aids to support the narrative**

SMET Goal = Comprehensive content (continued)

- **Tips, Notes, and Evidence considerations throughout**
  - Guidance on the gray areas
  - Concept of BES Reliability Operating Services (BROS)
  - Consideration of the 15-minute impact parameter
  - High-watermarking concept
  - Joint-owner scenarios, communications, and other considerations
  - Impact of operating agreements / contracts
  - Real-world examples to support the guidance
- **Companion documents**

"Associated"

- **Two interpretations**
  - Requirement R1.2 says "at"
  - Attachment 1 Section 2, Medium impact says "Associated with"
- **Interpretation 1**
  - Cyber Assets/Systems must be both at and associated with the BES Facilities
- **Interpretation 2**
  - Cyber Assets/Systems must be at and/or associated with the BES Facilities
  - Cyber Assets/Systems at in addition to those associated with the BES Facilities
  - Cyber Assets/Systems at plus those associated with the BES Facilities
- **Both are viable; however, interpretation 2 is more conservative and covers some unique situations**

15-minute impact parameter

- **Considerations for determining Adverse Impact**
  - Cyber Asset being unavailable, degraded, or misused
  - BES Facility experiencing loss, compromise, or misoperation as a result

    1. Choose not to use it, and apply protections independent of the 15-minute parameter
    2. Consider those functions that are automated that could avoid Adverse Impact
    3. "…Redundancy of affected Facilities, systems, and equipment shall not be considered when determining adverse impact."
    4. GOs must consider 15 minute impact in Attachment 1 Criterion 2.1 (1500 MW) regardless

It is a scoping factor, if Registered Entities use it, be prepared

Its All Connected

Requirements and Impact Rating Analysis

- **Unpacked the Standard, Requirement by Requirement**
- **Provided detail for each of the Individual Impact Rating Criterion**

Efficiencies:

- **Leveraging existing data as process inputs**
- **Identifying dependencies between criterion and how the order of application can save time. Start with Medium Impact!**

Input from other Reliability Standards

Functional Registration
- Documentation or attestation of NERC Functional Registrations for the Registered Entity

BES Assets and other assets in scope for evaluation
- List of BES Assets in accordance with the NERC BES definition. All Blackstart assets are included in the BES definition.
- If a Distribution Provider, the following assets are required to be evaluated (see Applicability Section 4.2.1).
  - Automatic UFLS or UVLS Programs.
  - Assets with Special Protection Systems/Remedial Action Schemes
  - Transmission Assets subject to one or more NERC standards
  - Cranking Paths and Elements from a Blackstart Resource.

One-line diagrams
- One-line diagrams depicting all BES Assets and other assets in scope
  - Include generation interconnection diagrams.
- FAC-008-3 R8.1.1 Facility Ratings provided to RC or TOPs associated with the one-line diagrams

Real Power Capability and Reactive Power Capability
- MOD-025-2 Attachment 2 for BES generation Facilities or similar evidence or;
- Attestation of no generation and/or no Reactive Power in scope of standard

Special Protection Systems/Remedial Action Systems (SPS/RAS)
- PRC-015-0 R1 List of SPS's or;
- Attestation of no SPS's

BES Adverse Reliability Impact – Generation
- TPL-003-2a – Assessment with finding that a generation Facility is designated as must-run to prevent a category C or higher contingency or;
- Attestation of Facilities with no identified BES Adverse Reliability Impact

Interconnection Reliability Operating Limits (IROL)
- FAC-014-2 R4 – IROLS (List of Facilities associated with IROLs) or;
- FAC-014-2 R5 – Received IROL notifications (List of Facilities associated with IROLs) or;
- Attestation of Facilities with no IROLs & no notification of IROLs received

Under-Voltage and Under-Frequency Load Shed (UVLS & UFLS)
- PRC-006-1 R6 UFLS data (document Facilities with UFLS) and;
- PRC-010-0 R1 UVLS Assessment data (document Facilities with UVLS)

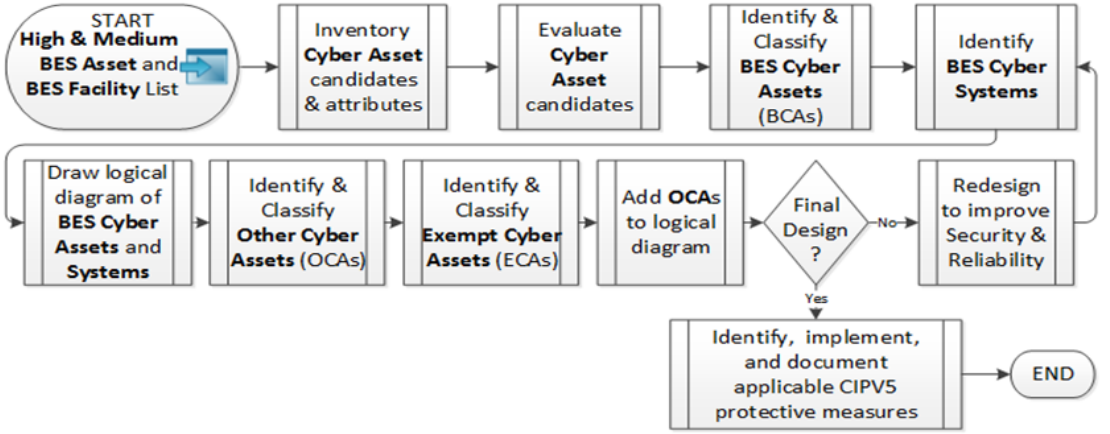
Nuclear Plant Interface Requirements (NPIR)
- NUC-001-2 R1 NPIR notifications or NUC-001-2 R2 NPIR agreements or;
- Attestation for sites not subject to NPIRs

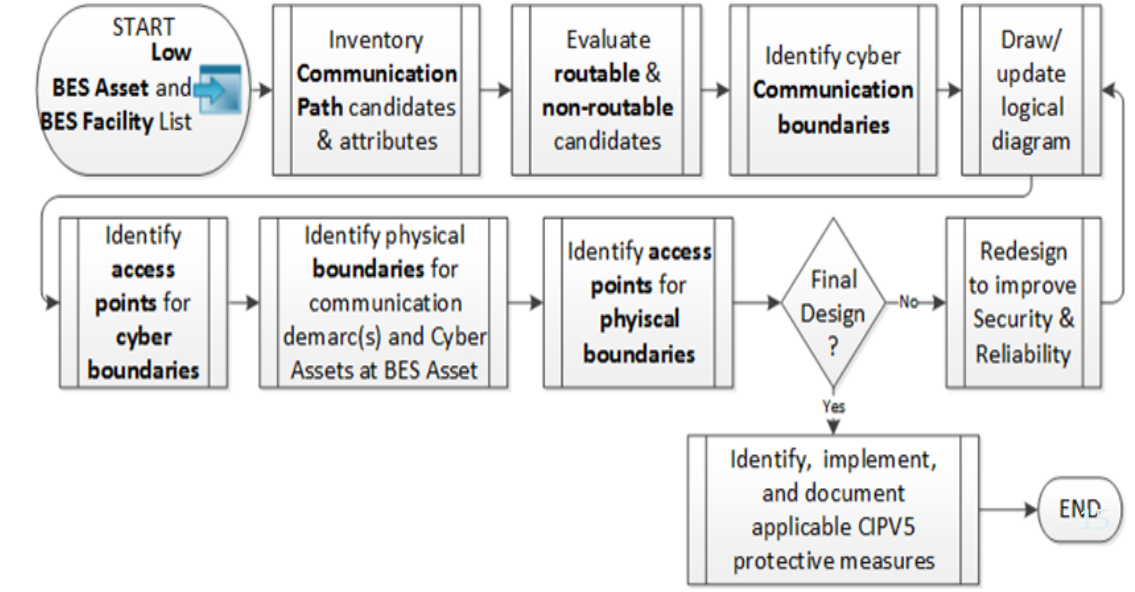
Tools to Apply the Attachment 1 Criteria

- **Companion Worksheets to apply the methodology for:**
  - High Impact Rating Criteria
  - Medium Impact Rating Criteria
  - Low Impact Rating Criteria
- **Eight (8) Examples**
  - Generation at a single plant location
  - Generation Facility
  - Reactive Resources at a single Transmission location
  - Transmission Facilities at a single substation or station
  - Transmission Facilities
  - SPS, RAS, or automated switching systems
  - Automatic Load Shedding
  - Control Center

Tools to Identify BES Cyber Assets/Systems

- **Sample Methodologies**
  - High-Level Methodology Diagrams
    - ✓ High and Medium Impact
    - ✓ Low Impact
  - Supporting Narratives and Rationale per step
  - Registered Entity definitions
  - Considerations for Inventorying Cyber Asset Candidates
    - ✓ Attribute data
    - ✓ Physical Inspections
    - ✓ Cyber Connectivity Reviews





Tools to Identify BES Cyber Assets/Systems

Examples of Inventorying Approaches

- Attribute Tables
- Sample Criterion
- Physical Discovery Mechanisms
- Electronic Discovery Mechanisms

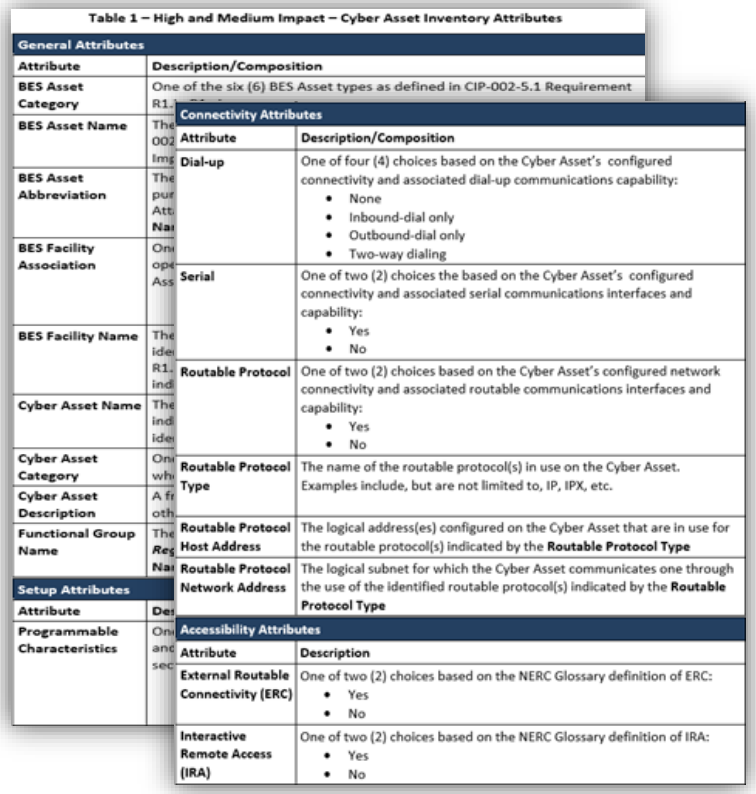


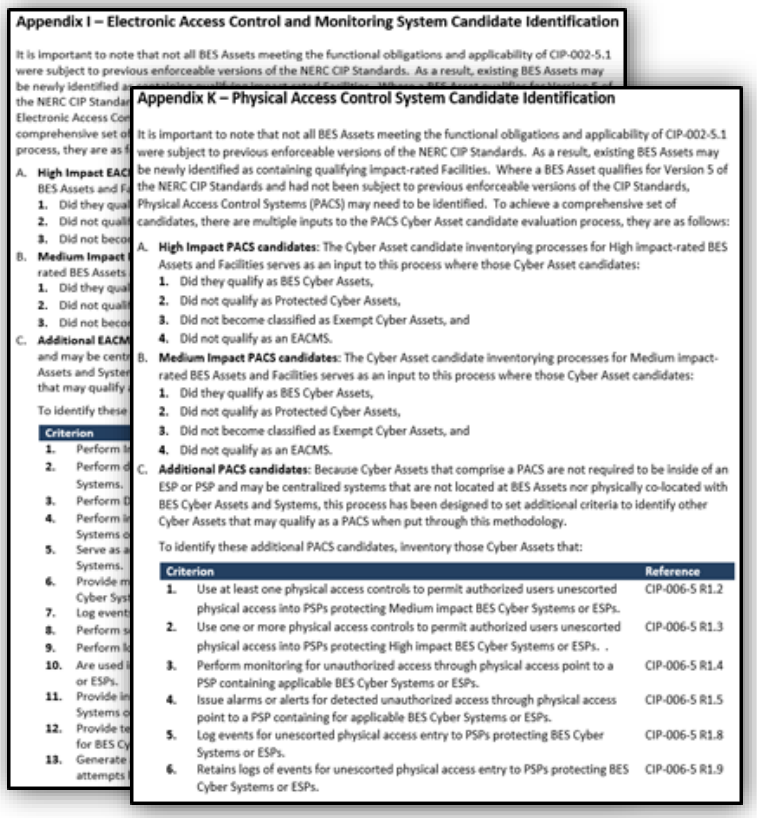
Table 1 – High and Medium Impact – Cyber Asset Inventory Attributes

General Attributes	
Attribute	**Description/Composition**
BES Asset Category	One of the six (6) BES Asset types as defined in CIP-002-5.1 Requirement R1.
BES Asset Name	The
BES Asset Abbreviation	The
BES Facility Association	One
BES Facility Name	The
Cyber Asset Name	The
Cyber Asset Category	One
Cyber Asset Description	A fi
Functional Group Name	The

Setup Attributes	
Attribute	**Des**
Programmable Characteristics	One

Connectivity Attributes	
Attribute	**Description/Composition**
Dial-up	One of four (4) choices based on the Cyber Asset's configured connectivity and associated dial-up communications capability: • None • Inbound-dial only • Outbound-dial only • Two-way dialing
Serial	One of two (2) choices the based on the Cyber Asset's configured connectivity and associated serial communications interfaces and capability: • Yes • No
Routable Protocol	One of two (2) choices based on the Cyber Asset's configured network connectivity and associated routable communications interfaces and capability: • Yes • No
Routable Protocol Type	The name of the routable protocol(s) in use on the Cyber Asset. Examples include, but are not limited to, IP, IPX, etc.
Routable Protocol Host Address	The logical address(es) configured on the Cyber Asset that are in use for the routable protocol(s) indicated by the **Routable Protocol Type**
Routable Protocol Network Address	The logical subnet for which the Cyber Asset communicates one through the use of the identified routable protocol(s) indicated by the **Routable Protocol Type**

Accessibility Attributes	
Attribute	**Description**
External Routable Connectivity (ERC)	One of two (2) choices based on the NERC Glossary definition of ERC: • Yes • No
Interactive Remote Access (IRA)	One of two (2) choices based on the NERC Glossary definition of IRA: • Yes • No



Appendix I – Electronic Access Control and Monitoring System Candidate Identification

It is important to note that not all BES Assets meeting the functional obligations and applicability of CIP-002-5.1 were subject to previous enforceable versions of the NERC CIP Standards. As a result, existing BES Assets may be newly identified as

Appendix K – Physical Access Control System Candidate Identification

It is important to note that not all BES Assets meeting the functional obligations and applicability of CIP-002-5.1 were subject to previous enforceable versions of the NERC CIP Standards. As a result, existing BES Assets may be newly identified as containing qualifying impact-rated Facilities. Where a BES Asset qualifies for Version 5 of the NERC CIP Standards and had not been subject to previous enforceable versions of the CIP Standards, Physical Access Control Systems (PACS) may need to be identified. To achieve a comprehensive set of candidates, there are multiple inputs to the PACS Cyber Asset candidate evaluation process, they are as follows:

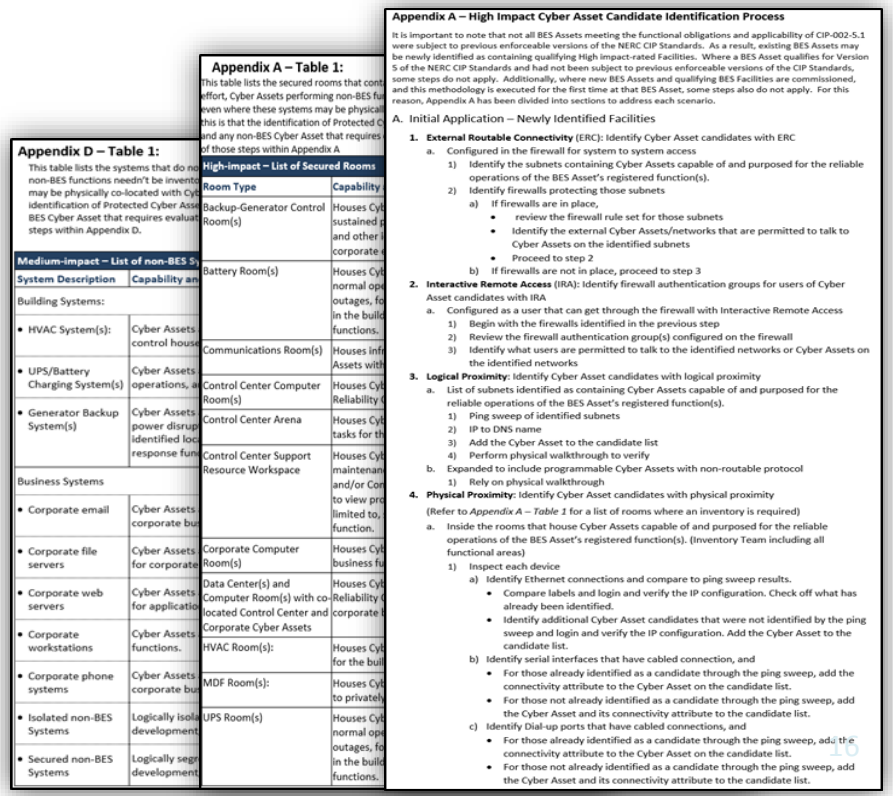
A. **High Impact PACS candidates**: The Cyber Asset candidate inventorying processes for High impact-rated BES Assets and Facilities serves as an input to this process where those Cyber Asset candidates:
1. Did they qualify as BES Cyber Assets,
2. Did not qualify as Protected Cyber Assets,
3. Did not become classified as Exempt Cyber Assets, and
4. Did not qualify as an EACMS.

B. **Medium Impact PACS candidates**: The Cyber Asset candidate inventorying processes for Medium impact-rated BES Assets and Facilities serves as an input to this process where those Cyber Asset candidates:
1. Did they qualify as BES Cyber Assets,
2. Did not qualify as Protected Cyber Assets,
3. Did not become classified as Exempt Cyber Assets, and
4. Did not qualify as an EACMS.

C. **Additional PACS candidates**: Because Cyber Assets that comprise a PACS are not required to be inside of an ESP or PSP and may be centralized systems that are not located at BES Assets nor physically co-located with BES Cyber Assets and Systems, this process has been designed to set additional criteria to identify other Cyber Assets that may qualify as a PACS when put through this methodology.

To identify these additional PACS candidates, inventory those Cyber Assets that:

Criterion		Reference
1.	Use at least one physical access controls to permit authorized users unescorted physical access into PSPs protecting Medium impact BES Cyber Systems or ESPs.	CIP-006-5 R1.2
2.	Use one or more physical access controls to permit authorized users unescorted physical access into PSPs protecting High impact BES Cyber Systems or ESPs. .	CIP-006-5 R1.3
3.	Perform monitoring for unauthorized access through physical access point to a PSP containing applicable BES Cyber Systems or ESPs.	CIP-006-5 R1.4
4.	Issue alarms or alerts for detected unauthorized access through physical access point to a PSP containing for applicable BES Cyber Systems or ESPs.	CIP-006-5 R1.5
5.	Log events for unescorted physical access entry to PSPs protecting BES Cyber Systems or ESPs.	CIP-006-5 R1.8
6.	Retains logs of events for unescorted physical access entry to PSPs protecting BES Cyber Systems or ESPs.	CIP-006-5 R1.9



Appendix D – Table 1:

This table lists the systems that do not non-BES functions needn't be inventoried may be physically co-located with Cyber identification of Protected Cyber Assets BES Cyber Asset that requires evaluation steps within Appendix D.

Medium-impact – List of non-BES Systems	
System Description	**Capability an**
Building Systems:	
• HVAC System(s):	Cyber Assets control house
• UPS/Battery Charging System(s)	Cyber Assets operations, a
• Generator Backup System(s)	Cyber Assets power disrup identified loc response fun
Business Systems	
• Corporate email	Cyber Assets corporate bu
• Corporate file servers	Cyber Assets for corporate
• Corporate web servers	Cyber Assets for applicatio
• Corporate workstations	Cyber Assets functions.
• Corporate phone systems	Cyber Assets corporate bu
• Isolated non-BES Systems	Logically isola development
• Secured non-BES Systems	Logically segr development

Appendix A – Table 1:

This table lists the secured rooms that cont effort, Cyber Assets performing non-BES fu even where these systems may be physica this is that the identification of Protected C and any non-BES Cyber Asset that requires of those steps within Appendix A

High-impact – List of Secured Rooms	
Room Type	**Capability**
Backup-Generator Control Room(s)	Houses Cyb sustained p and other corporate
Battery Room(s)	Houses Cyb normal ope outages, fo in the build functions.
Communications Room(s)	Houses infr Assets with
Control Center Computer Room(s)	Houses Cyb Reliability
Control Center Arena	Houses Cyb tasks for th
Control Center Support Resource Workspace	Houses Cyb maintenan and/or Cor to view pro limited to, function.
Corporate Computer Room(s)	Houses Cyb business fu
Data Center(s) and Computer Room(s) with co-located Control Center and Corporate Cyber Assets	Houses Cyb Reliability corporate
HVAC Room(s):	Houses Cyb for the buil
MDF Room(s):	Houses Cyb to privately
UPS Room(s)	Houses Cyb normal ope outages, fo in the build functions.

Appendix A – High Impact Cyber Asset Candidate Identification Process

It is important to note that not all BES Assets meeting the functional obligations and applicability of CIP-002-5.1 were subject to previous enforceable versions of the NERC CIP Standards. As a result, existing BES Assets may be newly identified as containing qualifying High impact-rated Facilities. Where a BES Asset qualifies for Version 5 of the NERC CIP Standards and had not been subject to previous enforceable versions of the CIP Standards, some steps do not apply. Additionally, where new BES Assets and qualifying BES Facilities are commissioned, and this methodology is executed for the first time at that BES Asset, some steps also do not apply. For this reason, Appendix A has been divided into sections to address each scenario.

A. Initial Application – Newly Identified Facilities

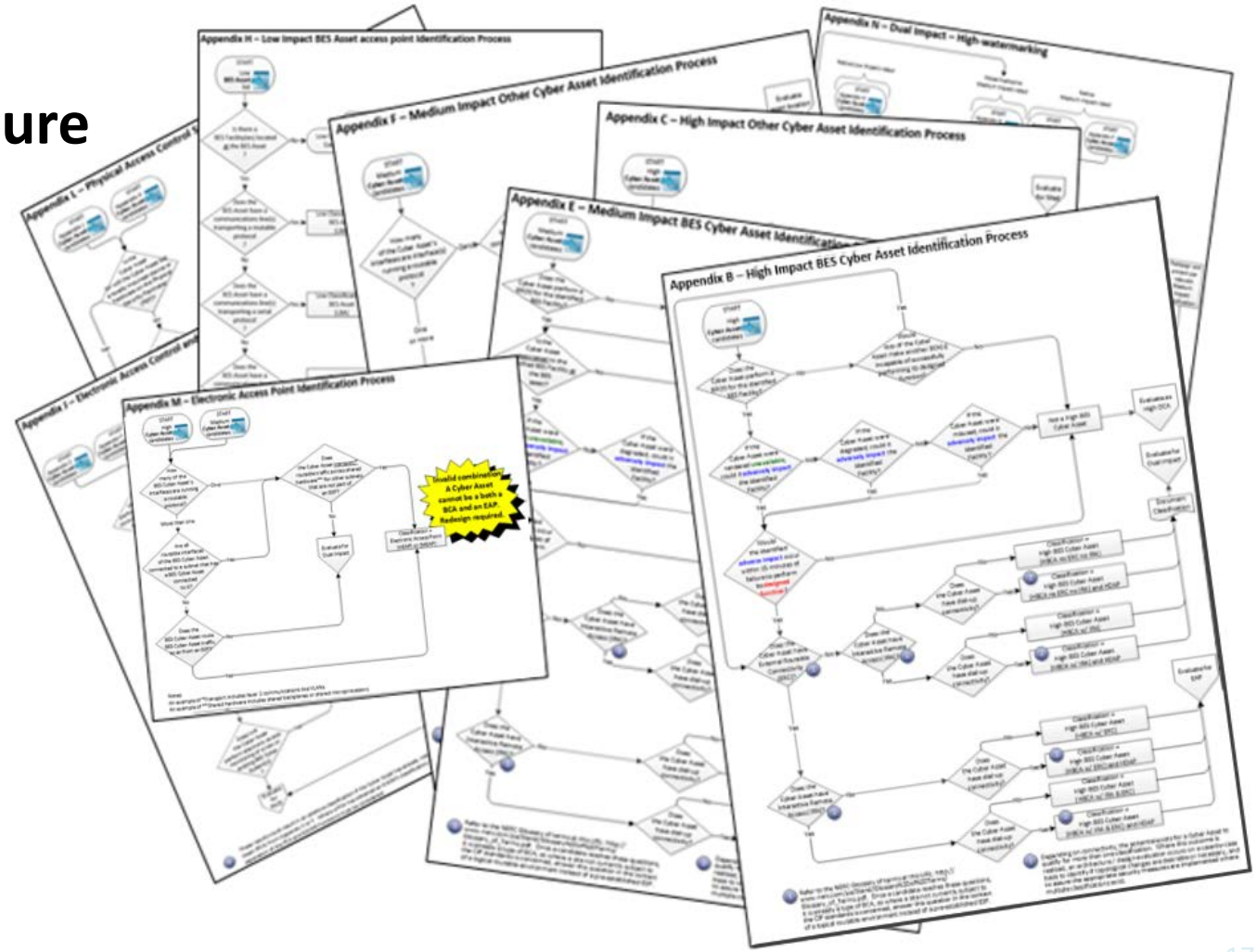
1. **External Routable Connectivity** (ERC): Identify Cyber Asset candidates with ERC
   a. Configured in the firewall for system to system access
      1) Identify the subnets containing Cyber Assets capable of and purposed for the reliable operations of the BES Asset's registered function(s).
      2) Identify firewalls protecting those subnets
         a) If firewalls are in place,
            - review the firewall rule set for those subnets
            - Identify the external Cyber Assets/networks that are permitted to talk to Cyber Assets on the identified subnets
            - Proceed to step 2
         b) If firewalls are not in place, proceed to step 3
2. **Interactive Remote Access** (IRA): Identify firewall authentication groups for users of Cyber Asset candidates with IRA
   a. Configured as a user that can get through the firewall with Interactive Remote Access
      1) Begin with the firewalls identified in the previous step
      2) Review the firewall authentication group(s) configured on the firewall
      3) Identify what users are permitted to talk to the identified networks or Cyber Assets on the identified networks
3. **Logical Proximity**: Identify Cyber Asset candidates with logical proximity
   a. List of subnets identified as containing Cyber Assets capable of and purposed for the reliable operations of the BES Asset's registered function(s).
      1) Ping sweep of identified subnets
      2) IP to DNS name
      3) Add the Cyber Asset to the candidate list
      4) Perform physical walkthrough to verify
   b. Expanded to include programmable Cyber Assets with non-routable protocol
      1) Rely on physical walkthrough
4. **Physical Proximity**: Identify Cyber Asset candidates with physical proximity

(Refer to *Appendix A – Table 1* for a list of rooms where an inventory is required)

   a. Inside the rooms that house Cyber Assets capable of and purposed for the reliable operations of the BES Asset's registered function(s). (Inventory Team including all functional areas)
      1) Inspect each device
         a) Identify Ethernet connections and compare to ping sweep results.
            - Compare labels and login and verify the IP configuration. Check off what has already been identified.
            - Identify additional Cyber Asset candidates that were not identified by the ping sweep and login and verify the IP configuration. Add the Cyber Asset to the candidate list.
         b) Identify serial interfaces that have cabled connection, and
            - For those already identified as a candidate through the ping sweep, add the connectivity attribute to the Cyber Asset on the candidate list.
            - For those not already identified as a candidate through the ping sweep, add the Cyber Asset and its connectivity attribute to the candidate list.
         c) Identify Dial-up ports that have cabled connections, and
            - For those already identified as a candidate through the ping sweep, add the connectivity attribute to the Cyber Asset on the candidate list.
            - For those not already identified as a candidate through the ping sweep, add the Cyber Asset and its connectivity attribute to the candidate list.

Tools to Identifying BES Cyber Assets/Systems

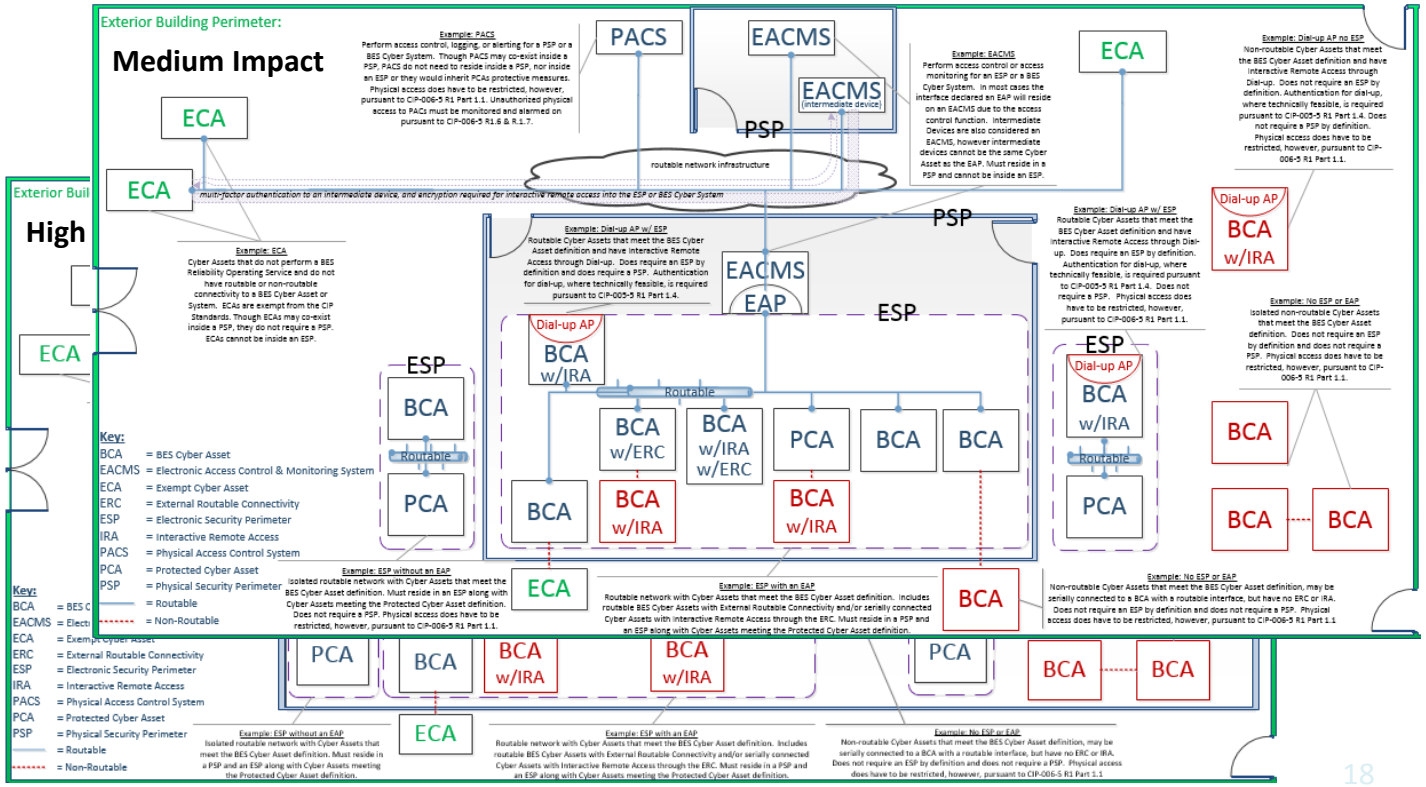
- **Sample Standard Operating Procedure**
  - Step-by-Step Instruction to:
    - ✓ Identify Cyber Asset Candidates
    - ✓ Evaluate Cyber Asset Candidates
    - ✓ Classify BES Cyber Assets
    - ✓ Determine BES Cyber Systems
  - Detailed process flow diagrams
    - ✓ Objective criteria
    - ✓ Includes other protected Cyber Assets



Tools for CIP-005-5 & CIP-006-5 Considerations

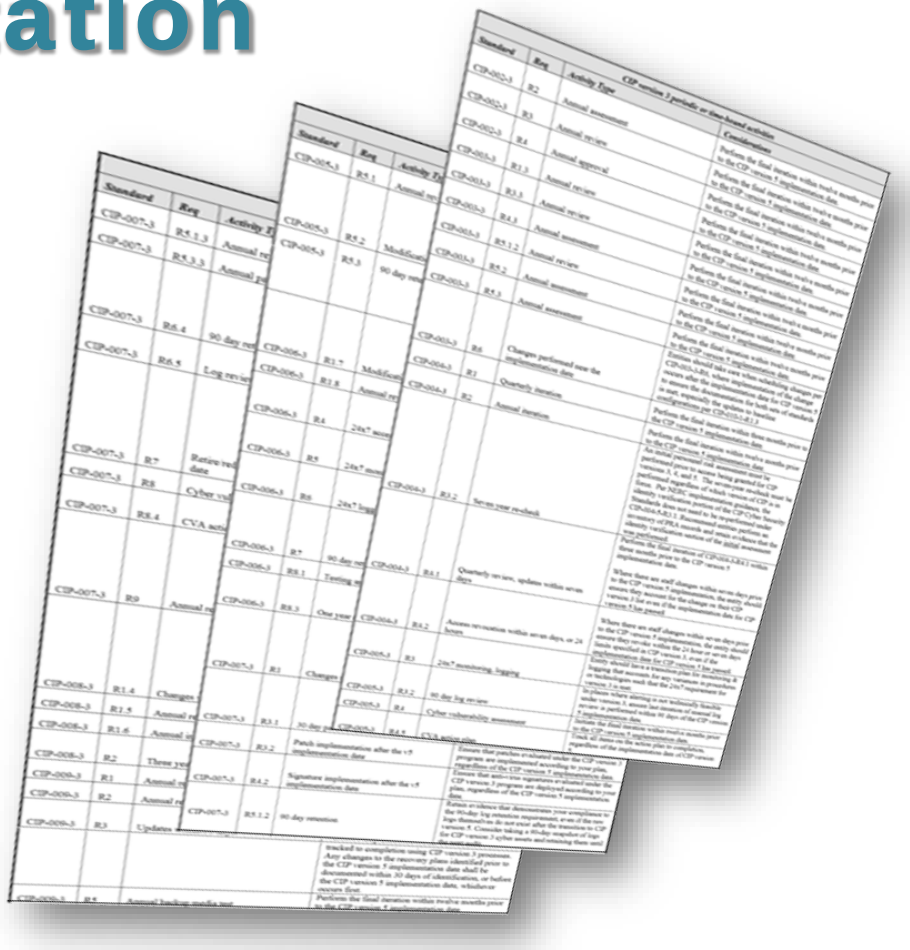
- **Sample Connectivity Scenarios**
  - Various topologies, cyber configurations or redesign options
  - Other types of Protected Cyber Assets
  - Impact of connectivity on:
    - ✓ Applicability of Requirements
    - ✓ BES Cyber System determination
  - Electronic Security requirements
  - Physical Security requirements

How its all related…



Tools for V3 to V5 Implementation

- **Companion Guide:**
  - V5 effective dates
  - Entity specific considerations
    - ✓What each entity needs to ask themselves
    - ✓Next steps depending on the answer
  - Audit cycles
  - Evidence retention
  - Periodic or time-bound activities
    - ✓V3 Requirement by Requirement



Does it work? SMET tested it, three ways.

Why we tested our recommended approach:

- **Confidence in the product**
- **Measure the usability**
- **Reasonable assurance it will work for others**

How we tested our recommended approach:

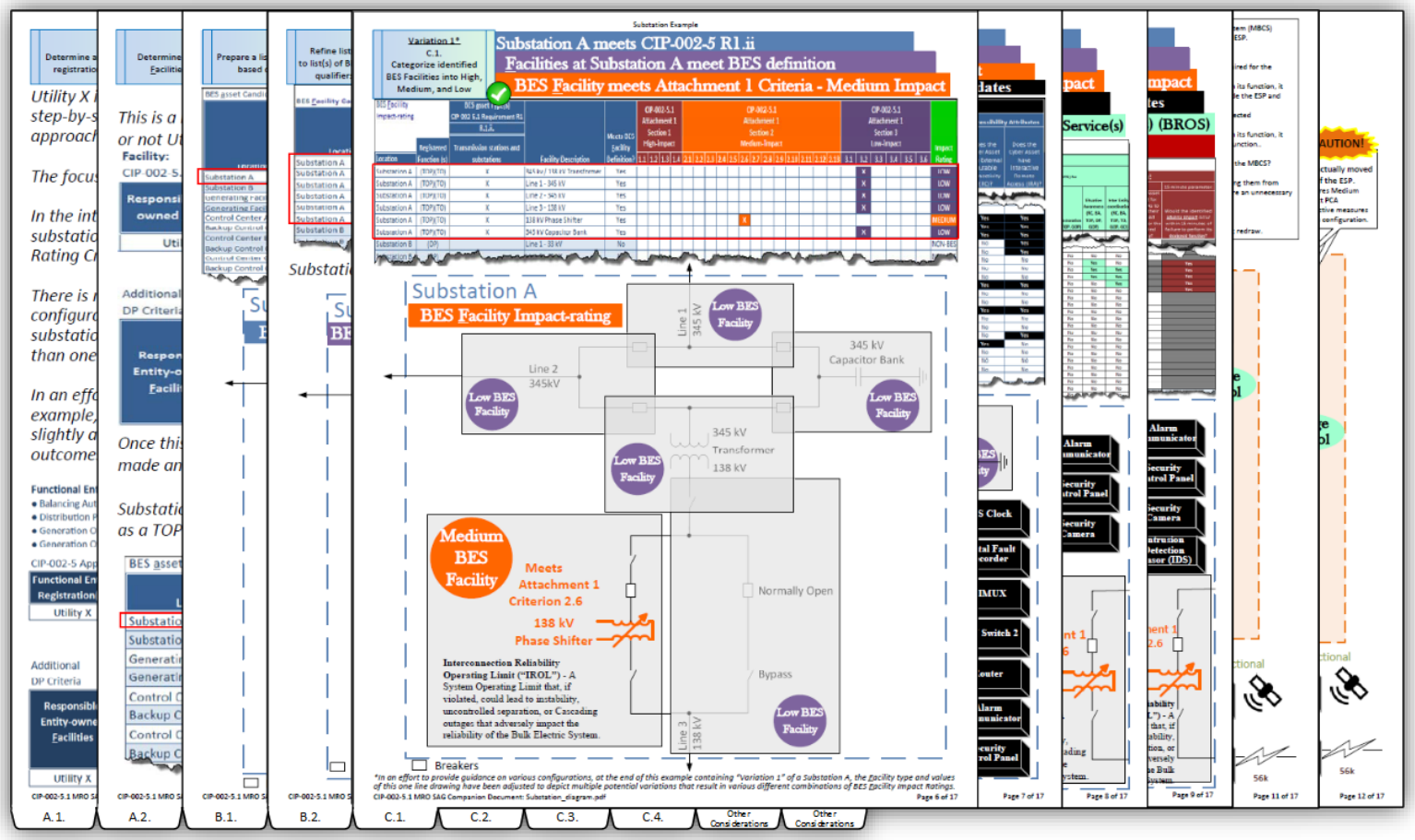
- **Applied the Step-by-Step Instruction**
  - Transmission Substation
  - Generating Station
  - Control Center

What we learned from testing/proving it out:

- **The methodology is**
  - Usable
  - Flexible
  - Straight forward
  - Repeatable
  - Adaptive
  - Comprehensive
  - Reaps results and evidence
- **Bonus – Companion Diagrams**
  - We have these various scenarios and examples to provide to the industry to accompany the CIP-002-5.1 SAG

Transmission Substation – Proof of Concept

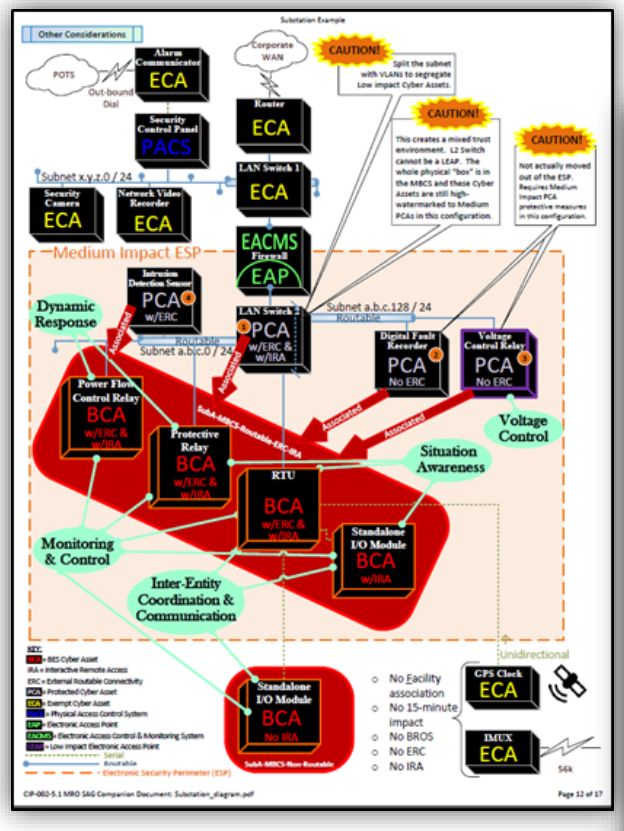
- **Approach 1.a**
- **Cyber Asset-based**
- **Electrical Focus**
  - 1-line diagrams
- **Five similar, yet different scenarios**

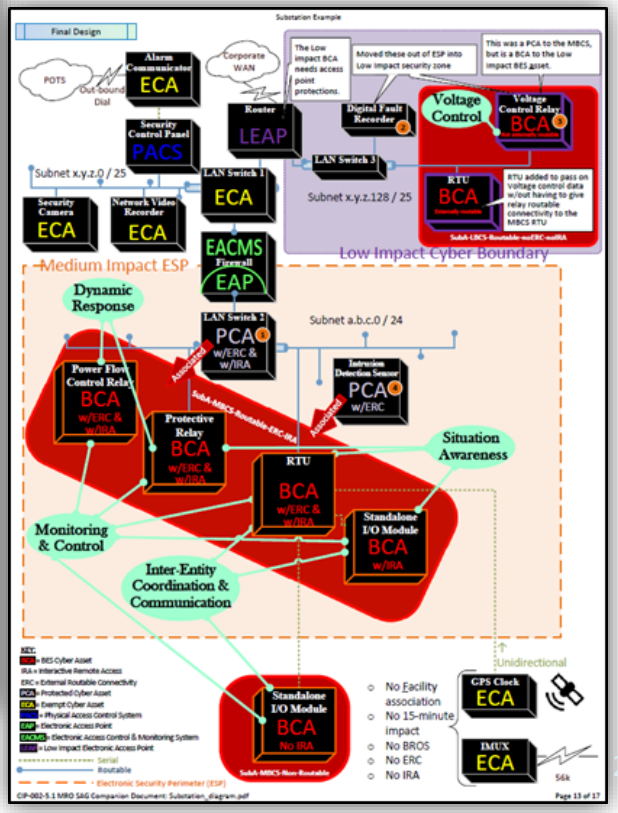


Other Considerations

Mixed Trust vs. Segregated Trust Zones

- **High Watermarking**
  - Virtualization
    - ✓ Hypervisors
    - ✓ VLANs
    - ✓ Chassis/Shared Backplanes
  - Medium inside High ESP → High
  - Low inside High ESP → High
  - Low inside Medium ESP → Medium

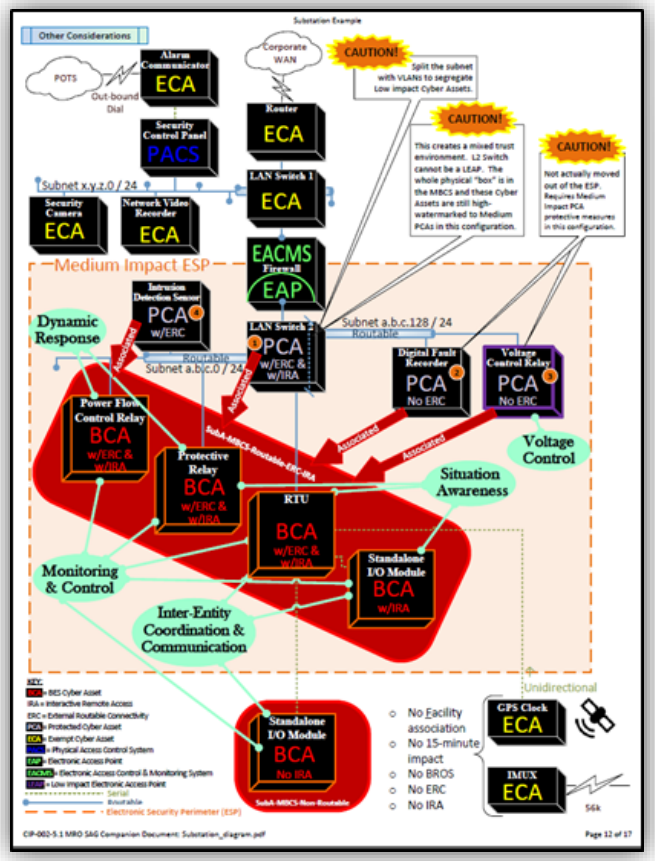


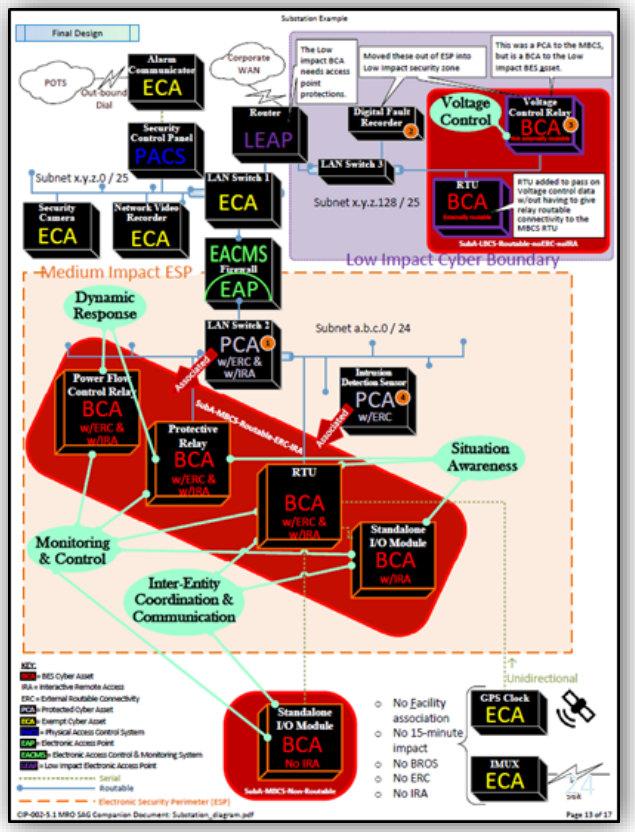


Other Considerations (continued)

Mixed Trust vs. Segregated Trust Zones

- **Co-existing Impact-rated BCS**
  - High, Medium, and Low
  - High and Medium
  - High and Low
  - Medium and Low





Let's dive in to the details

First Example:

Transmission Substation

- Reference Companion Document: Substation_diagram.pdf

Medium Criteria for Generation

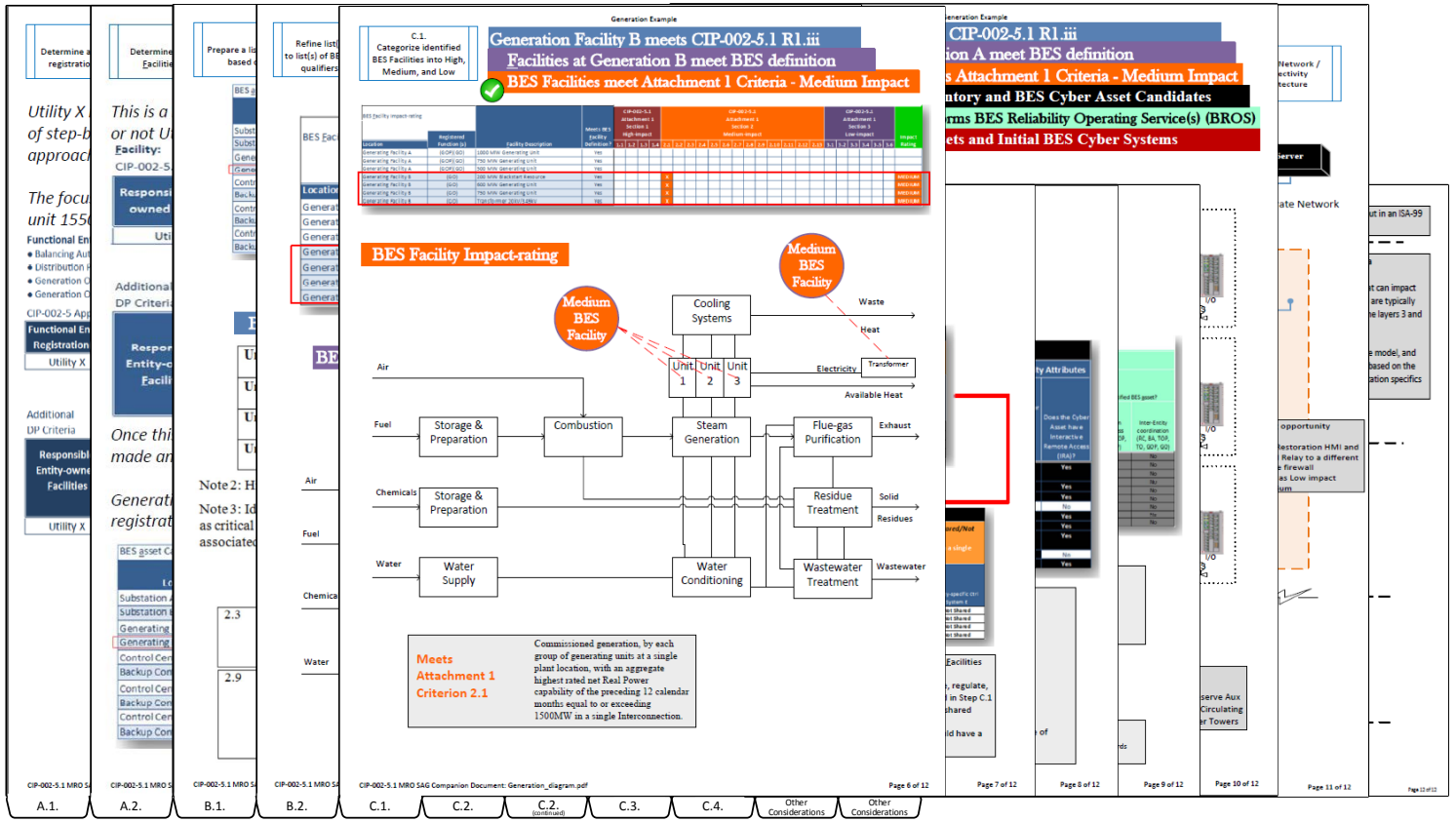
2.1	Commissioned generation, by each group of generating units at a single plant location, with an aggregate highest rated net Real Power capability of the preceding 12 calendar months equal to or exceeding 1500 MW in a single Interconnection. ***For each group of generating units, the only BES Cyber Systems that meet this criterion are those shared BES Cyber Systems that could, within 15 minutes, adversely impact the reliable operation of any combination of units that in aggregate equal or exceed 1500 MW in a single Interconnection.***
2.3	Each generation ***Facility*** that its Planning Coordinator or Transmission Planner designates, and informs the Generator Owner or Generator Operator, as necessary to avoid an Adverse Reliability Impact in the planning horizon of more than one year.
2.6	Generation at a single plant location or Transmission Facilities at a single station or substation location that are identified by its Reliability Coordinator, Planning Coordinator, or Transmission Planner as critical to the derivation of Interconnection Reliability Operating Limits (IROLs) and their associated contingencies.

Also criteria:

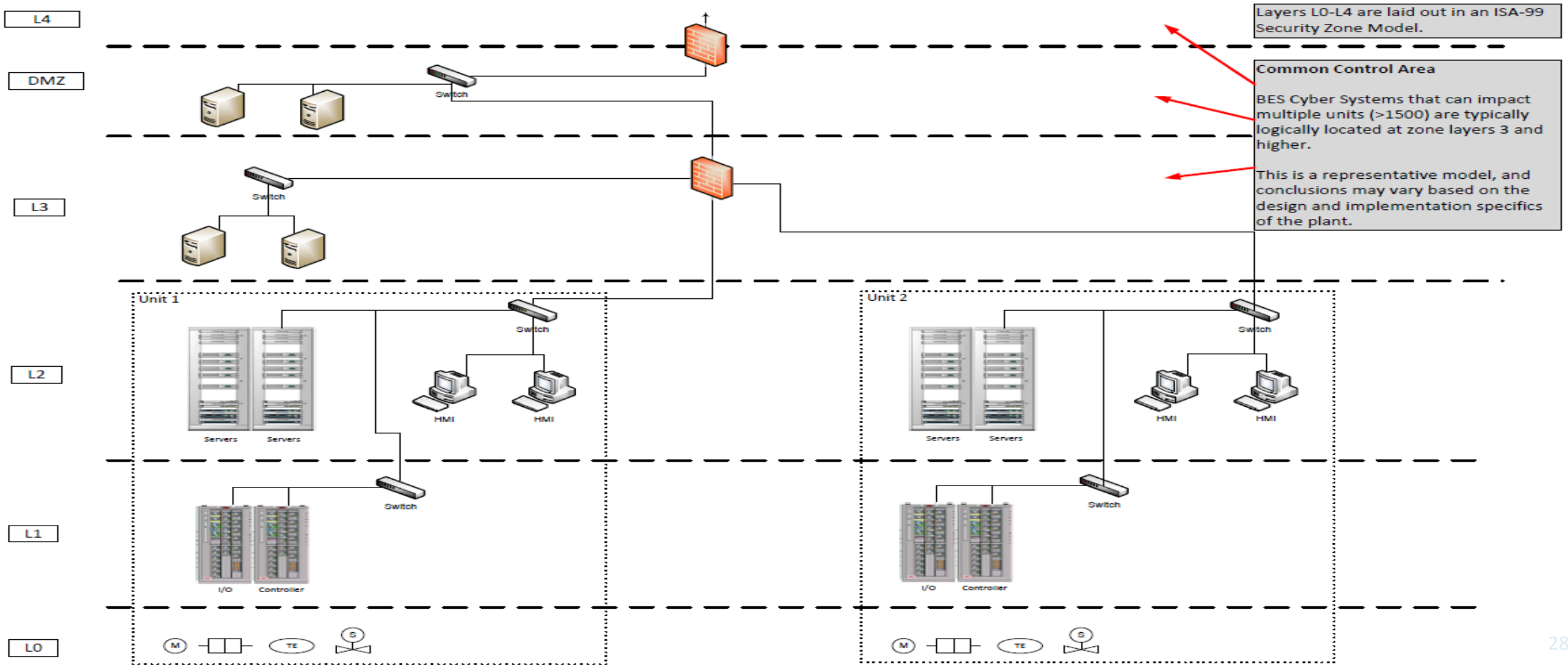
2.9 SPS
2.11 Control Center for >1500MW

Generating Station – Proof of Concept

- **Approach 1.a**
- **Cyber Asset-based**
- **Mechanical Focus**
  - Units
  - Water
  - Chemicals
  - Fuel
  - Air
  - Cooling, etc.



Other Considerations - Segregated Trust Zones



Let's dive in to the details

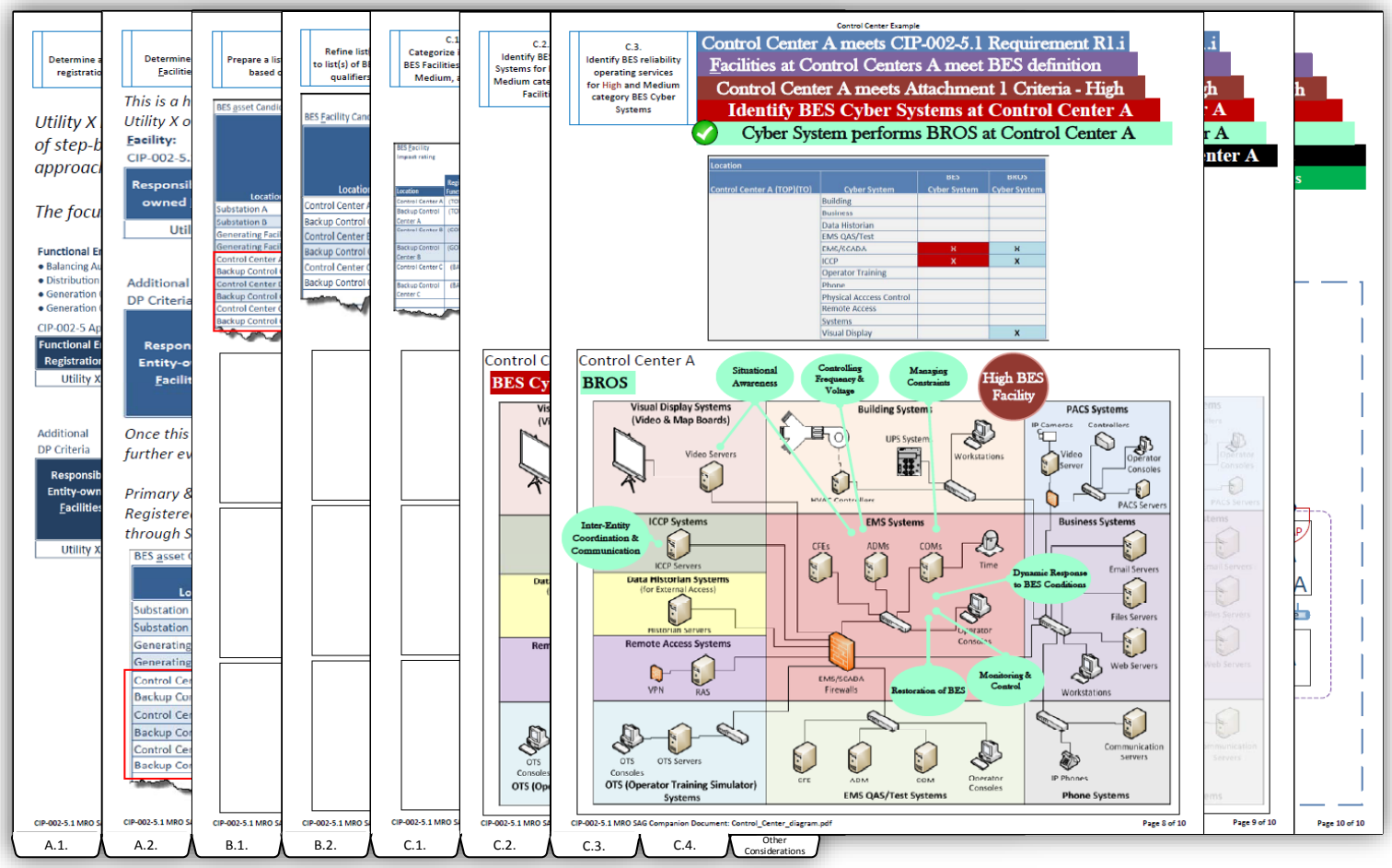
Second Example:

Generating Station

- Reference Companion Document: Generation_diagram.pdf

Control Center – Proof of Concept

- **Approach 1.b**
- **Cyber System-based**
  - Business Systems
    - ✓Corporate Apps
    - ✓Building, etc.
  - BES Systems
    - ✓EMS
    - ✓ICCP, etc.
- **BROS**



Let's dive in to the details

Third Example:

Control Center

- Reference Companion Document: ControlCenter_diagram.pdf

Control Center Summary

- **Assemble a cross functional assessment team**
- **Assessment team needs to:**
  - Have representation from of each system identified
  - Understand system functionality and interconnectivity
  - Be able to answer questions about the BROS
- **Start at the System level**

Control Center Summary (continued)

- Eliminate systems that do not meet the criteria for applicable systems
- Assess Cyber Assets in applicable BES Cyber Systems
- DOCUMENT ALL ASSESSMENTS!!!
- Get ready to apply the rest of the CIP Standards to the applicable Cyber Assets
- To assist with classifications of Cyber Asset refer to the NERC Glossary of Terms

Testing Results

- **Three different Registered Entities**
- **Three different BES asset types**
- **Three different ways to apply**
  - Electrical
  - Mechanical
  - Cyber System
- **One Methodology**
- **Three successful outcomes**

Summary

- SAG is over a year in the making
- CIP SMET is proud to present this to the region and the industry

Thank you for your time, and this opportunity!

Questions?