

From: [Guy V. Zito](#)
To: [rsballot](#)
Cc: [rsc](#)
Subject: NERC Ballot 2016-02 Modifications to CIP Standards | CIP-003-7, Implementation Plan, and Definition of LERC
Date: Tuesday, September 6, 2016 8:43:31 AM
Importance: High

NPCC Members and Entities of the NERC Registered Ballot Body,

The NPCC Regional Standards Committee (RSC), with input from the NPCC Task Force on Infrastructure Security and Technology (TFIST) conducted a review of the subject materials currently posted for initial ballot. This Initial Ballot period currently **closes at 8pm 9/6/2016** so if you are registered to cast a ballot, please do so.

There are four items posted for this ballot. The RSC and consultant task force TFIST have not reached consensus on posted items as follows:

- *Implementation Plan*- **Consensus to vote Negative-NPCC as the regional entity will cast a ballot consistent with the consensus position**- The implementation should afford the entities an additional year to be compliant, no sooner than September 2018.
- *Definition of LERC*-**Consensus to vote Negative- NPCC as the regional entity will cast a ballot consistent with the consensus position**-LERC – Low Impact External Routable Connectivity was revised to propose replacing the word Connectivity with Communication. Change was in response to the FERC directive to clarify the term “direct”. The proposed revision from the SDT, as revised, states LERC exists where there is routable protocol communication that crosses the asset boundary without regard to whether 'direct' or 'indirect' access may occur. This change, while addressing FERC concern and also the third party communication ownership issue such as telephone company owned equipment, focuses on only communication crossing the boundary of the asset containing the low impact BES Cyber System. However, it was raised that securing “connectivity” remains important and protects against all attacks using that network pathway (OSI layers). Connectivity and communications are different and as written the revised definition could open up the vulnerability of connectivity without communications. This leaves a potentially unprotected path for attackers to connect through the asset’s boundary.
- Non-Binding Poll-**Consensus to vote Positive- NPCC as the regional entity will cast a poll consistent with the consensus position.**
- CIP-003-7 Revised Standard-**No Clear Consensus**- Some entities expressed that the definition and standard ballot positions should be consistent. Not supporting the definition could lead some to non-support of the standard because the standard was revised primarily to reflect changes made to the LERC designation and definition (i.e. connectivity to communication). Also to keep in consideration is the FERC Order 822, Paragraph 73; issued January 21, 2016 requires NERC to file a revised standard within one year of the effective date of the standard. **NPCC, as the regional entity, will vote Affirmative on the Standard** due to recognition that the issue with the potential reliability issue created with the definition revision can be addressed in a revision of that proposed definition. Also the affirmative vote will support the filing date of the proposed

revised standard with the commission.

Additional Information-

NPCC has filed comments and made suggestions to address our concerns. NPCC staff is supporting the standard drafting team meetings and will be at the meetings to help relate our concerns as well as gain an understanding of the team's positions.

There will be further revisions to this standard and likely multiple open petitions before the Commission. Specifically, the term "Exceptional Circumstance" needs clarification and also revisions pertaining to FERC concerns of transient devices. Discussions with NERC indicate that it has not yet been decided if there will be additional version numbers assigned to CIP-003 for these efforts or if there will be the CIP-003-X designation for these revisions. NPCC will keep everyone informed of the approach.

If there are any questions please contact me.

Guy V. Zito
Asst. Vice President – Standards
Northeast Power Coordinating Council Inc.
1040 Avenue of the Americas, 10th Floor
New York, NY 10018
Phone 212-840-1070
Fax 212-840-2782
gzito@npcc.org