Summary of Proposed Reliability Standard: CIP-003-9

Details of Standard Development

Reliability Standards Authority:	NERC
Standard(s)	CIP-003-9 – Security Management Controls
Purpose	The purpose of NERC Reliability Standard CIP-003-9 is to modify Reliability Standard CIP-003-8 to include policies for low impact BES Cyber Systems to: (1) detect known or suspected malicious communications for both inbound and outbound communications; (2) determine when active vendor remote access sessions are initiated; and (3) disable active vendor remote access when necessary.
Change Type:	FERC Directive
Affected Functional Entities:	• Generator Owner (GO) • Generator Operator (GOP) • Transmission Owner (TO)
Ballot Results:	66.81% approval with 86.25% quorum
Ontario Participant Support:	• There were 251 votes cast by NERC registered entities. • 2 OEB rate-regulated entities voted (2/251). OEB-rate regulated GO/GOP voted negative and OEB-rate regulated TO voted affirmative.
Impact Within Ontario	Not assessed

Standard Development Milestones

Date	Action
November 16, 2022	Adopted by NERC Board of Trustees

December 6, 2022	NERC Petition for Approval
January 5, 2023	IESO Posting Date
May 6, 2023	End of OEB Preliminary Review Period
TBD	FERC Order Issued
TBD	US Mandatory Enforcement Date
TBD	Ontario Enforcement Date (Milestones in Reliability Standard Development and Lifecycle)

Summary

Proposed Reliability Standard CIP-003-9 includes cyber security policies for the areas covered under the other CIP cyber security standards. In addition, proposed CIP-003-9 includes all the controls applicable to low impact BES Cyber Systems. The revisions in proposed CIP-003-9 contain additional requirements applicable to responsible entities with low impact BES Cyber Systems to mitigate the risks of vendor electronic remote access.

Requirement R1, Part 1.2 includes a proposed new policy topic in Part 1.2.6. Under this requirement, responsible entities must include the topic of "vendor electronic remote access security controls" in their cyber security policies required under Requirement R1. Proposed new Section 6 of Requirement R2, Attachment 1 includes the processes that must be included in cyber security plans pursuant to Requirement R2.

Other Salient Information

Stakeholder Consultation

NERC Reliability Standards Development Procedure

- NERC develops Reliability Standards in accordance with Section 300 (Reliability Standards Development) of its Rules of Procedure and the NERC Standard Processes Manual;
- NERC's rules provide for reasonable notice and opportunity for public comment, due process, openness, and a balance of interests in developing Reliability Standards;
- The development process is open to any person or entity with a legitimate interest in the reliability of the Bulk Power System. NERC considers the comments of all stakeholders;

- Stakeholders must approve, and the NERC Board of Trustees must adopt, a new or revised Reliability Standard before NERC submits the Reliability Standard to FERC for approval;
- NERC provided public notices for comments and balloting as follows:
  - Standard Authorization Request: April 03 – June 03, 2020
  - Draft 1 of Proposed Changes: October 01, 2021 – November 11, 2021
  - Draft 2 of Proposed Changes: April 06 – April 15, 2022
  - Draft 3 of Proposed Changes: August 10 – August 19, 2022
  - Final Draft of Proposed Changes: October 26 – November 04, 2022

IESO Reliability Standards Standing Committee

- The purpose of the Reliability Standards Standing Committee (RSSC) is to assist market participants to develop a more comprehensive understanding of their reliability obligations by:
  - Notifying participants of reliability-related information on new and developing reliability standards;
  - Providing a forum to discuss and develop consensus comments on new and developing reliability standards; and
  - Engaging participants in the standard development process of NERC and NPCC.
- The majority of stakeholder engagement takes place by email communications and is open to any stakeholder wishing to join
- The IESO presented the proposed changes at the following RSSC meetings:
  - August 25, 2022
  - December 12, 2022