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NATF Criteria and ESSCR Questionnaire: Overview, Use, and **Revision Process**

October 2, 2020

Agenda Overview

- Background
- Overview of the Criteria and Questionnaire
- How to use the Criteria and Questionnaire
- The Revision Process
- Questions/Discussion



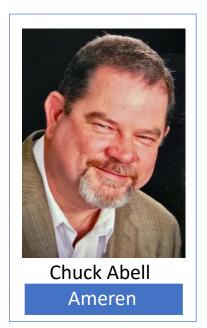


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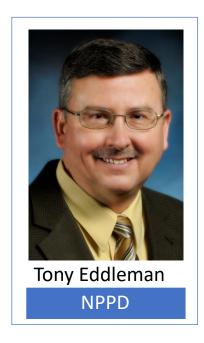


Jack Cashin APPA









Today's Presenters - Industry



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Today's Supplier and Solution Provider Presenters

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Purpose of Today's Webinar and Background

Encourage Industry Convergence

Benefits of Industry Convergence

- Obtain the information you need and use
- Suppliers providing responses
 - Suppliers are gathering information for all of the questions in the questionnaire
 - Readily available for you





Industry Organization Team Members

Organizations, Forums and Working Groups

- AGA
- CEA
- EEI
- LPPC
- APPA
- TAPS
- NAGF
- NAESB
- ConEd Working Group
- SCWG/CIPC
- NRECA

Suppliers

- Hitachi ABB Power Grids
- GE Grid Software Solutions
- OSI
- Siemens Industry, Inc.
- Schneider Electric
- Schweitzer Engineering

Third-Party Assessors

- Ernst & Young
- KPMG LLP
- PWC
- Deloitte

Organizations providing support products or services

- EPRI
- Fortress/A2V
- KY3P
- UL



Objectives

Security

 Identifying and addressing cyber security risks introduced via supply chain

Industry Convergence

 Achieve industry convergence on the approach (Model) to facilitate addressing the following objectives

Efficiency and Effectiveness

Convergence on common approaches to achieve reasonable assurance of suppliers' security practices

Compliance

 Implementation guidance to meet supply chain related CIP standards (CIP-013-1; CIP-005-6 R2.4; CIP-010-3 R1.6)

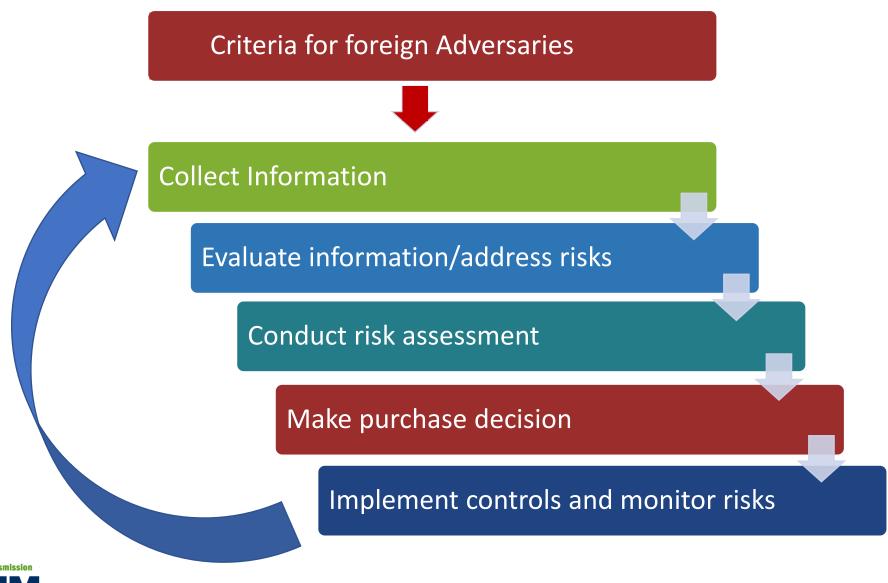


Supplier Assessment Model Process Overview





Possible Assessment Process with EO Criteria



Collect Information

Collect it yourself

- NATF Cyber Security Criteria for Suppliers
- Energy Sector Supply Chain Questionnaire
- Supplement with
 - Historical knowledge
 - Open source research
- Use a solution-provider service





Methods to Obtain Assurance of Accuracy

Third-party Assessments

 Obtain a qualified assessors' third-party assessment, certification and/or independent audit that addresses NATF Criteria and Questionnaire

Obtain a validation/verification from a solution provider

- Solution-provider risk assessments
- Shared assessments

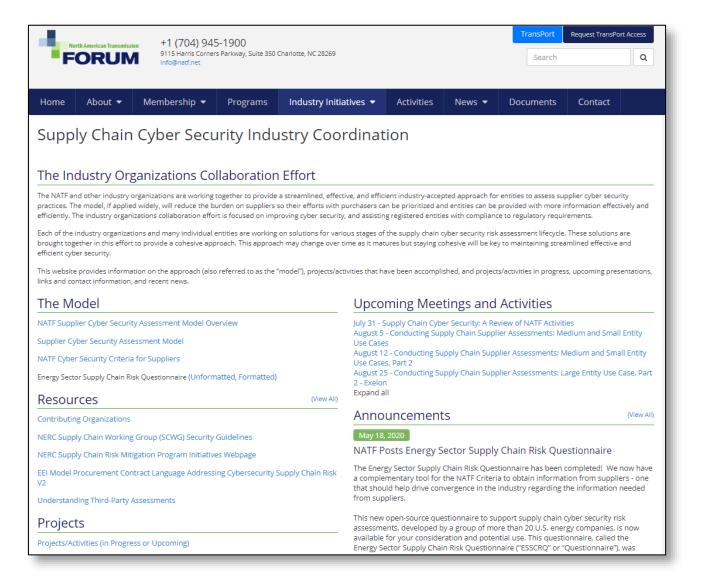
Conduct your own validation/verification

 Obtain evidence from supplier to conduct your own validation/verification

Collect Information



NATF-hosted Industry Organizations Web Page Val Agnew (NATF)





Participoll Question!

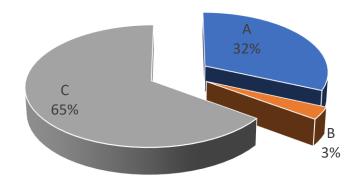
What function are you with in your organization?

- A. Cyber Security
- B. Procurement
- C. Compliance

Vote Now!

https://natfvote.participoll.com/





Participoll question!

How are you currently collecting information from suppliers?

- A. NATF Criteria
- B. NATF Questionnaire
- C. Modified NATF Criteria
- D. Modified NATF Questionnair
- E. My own custom questionnair
- F. I use a solution provider with their questions
- G. I use a solution provider to collect the Criteria and Questionnaire information



https://natfvote.participoll.com/





Open Questions





Overview of the Criteria and Questionnaire



The NATF Criteria

Available on the NATF Public Website:

https://www.natf.net/industry-initiatives/supply-chain-industry-coordination

Criteria for Evaluations: The NATF Criteria

What is the criteria or security framework?

- Posted on the NATF Public Website
- 60 criteria for supplier supply chain cyber security practices within 6 Risk Areas:
 - Asset Control and Mgmt
 - Asset, Change and Configuration Mgmt
 - Governance
 - Incident Response
 - Information Protection
 - Vulnerability Mgmt
- 24 organizational information considerations
- Maps to existing frameworks



Tony Eddleman (NPPD)

NATF Criteria Spreadsheet: Criteria

			Required by NE Standa					NI	ST			CIS Controls v7.1	IEC 62443	ISO 27001	SOC2	UL Supplier Cyber Trust Level
Criteria Identification Number	Risk Area	NATF Cyber Security Supply Chain Criteria for Suppliers Version 1 (NATF Board Approved)	Good security practices; exceeds NERC CIP Standards' requirements	CIP-013 requirement or supports other standards	Governance and all criteria NIST SP 800- 161, 800-53	Access NIST SP 1800-2	Asset Chg Config- NIST SP 1800-5	Info Protection - NIST SP 800-171	Incident Response - NIST SP 800- 184, 800- 150, 800-61	Vulnerability Mgmt - NIST SP 800-64, 800- 160, 800-82, 800-115, 800- 125	Cybersecurity Framework Version 1.1			List other versions of ISO 27001.xxxx, 2700X if applicable	SOC FOR SUPPLY CHAIN SOC FOR CYBER SECURITY	
27	Incident Response	Supplier cyber security incident response plan contains clear roles and responsibilities which includes coordination of responses to their customer(s)	x	Y	PR.IP-9 Rev 4 IR-1 IR-2 IR-8	~			61: 2.3.1, 2.6, 3.2.7 150: 3.4	▼	RS.CO-1	CSC 19: Incident Response and Management	2.4 SP.08.01 2.1 4.3.2.6	A.16.1.1	CC7.4	Trust Category 5 Trust Category 9
28	Incident Response	Supplier's cyber security incident response plan contains requirements to notify entities that purchased impacted products or services within 24 hours of initiation of the supplier's plan		R1.2.1, R1.2.2	PR.IP-9 Rev 4 IR-8				61: 3.2.7 150: 3.3, 3.4, 3.5 184: 2.4	160: 2.3.2, 3.3.QA-5	PR.IP-9	CSC 19: Incident Response and Management	2.4 SP.08.01 2.1 4.3.4.5.3 2.1 4.3.4.5.5 (no 2 hours mention) 2.4 SP.08.03 2.1 4.3.4.5.3	7.4 A.16.1.1 A.16.1.2 A.16.1.5	CC2.3 CC7.4 CC7.5	Trust Category 5 Trust Category 9
29	Incident Response	Supplier's cyber security incident response plan contains steps to identify, contain, eradicate, recover	х	R1.2.2					61: 3.2.2, 3.2.3, 3.3.4 150: 4.2, 3.3.4 184: 2.3.3, 2.3.4		PR.IP-9	CSC 19: Incident Response and Management	2.4 SP.08.01 2.1 4.3.4.5.6 2.1 4.3.4.5.7 2.1 4.3.4.5.10 2.1 4.3.4.3.8	A.16.1.1 A.16.1.4 A.16.1.5	CC3.2 CC7.2 CC7.3 CC7.4	Trust Category 5 Trust Category 9
30	Incident Response	Supplier cyber security incident response plan includes steps and requirement to perform an after-action review, i.e. lessons learned	x		PR.IP-9 Rev 4 IR-4 IR-10				61: 3.3.4, 3.4.1 184: 3.2		RS.MI-1	CSC 19: Incident Response and Management	2-1 4.3.4.5.1 2-1 4.3.4.5.8 2-4 SP.08.01 BR	A.16.1.1 A.16.1.5 A.16.1.6 A.16.1.7	CC7.4 CC7.5	Trust Category 5 Trust Category 9
31	Incident Response	Supplier's cybersecurity incident response plan is periodically assessed Provide date of last assessment	x							115: 6.4.1, 6.5			Comes with the certification	A.16.1.1 A.18.2.1	CC3.1 CC3.2 CC4.1 CC7.4 CC9.2	Trust Category 5 Trust Category 9
		Supplier has taken appropriate action in response to assessment(s) of											Comes with	A.18.2.1	CC2.3	Trust Category 5



NATF Criteria Spreadsheet: Organizational Information

				Sta	NERC Reliability ndards?				N
Criteria Identification Number	Risk Area	Cyber Security Initial Information	Notes	Good security practices; exceeds NERC CIP Standards'	CIP-013 requirement or supports other standards	V	Governanc e and all criteria NIST SP 800-161, 800-53	Access NIST SP 1800-2	Asset Chg F Config - NIST SP 1800-5
OI.14	Organizational Information	Provide number of years supplier has been in business							
OI.15	Organizational Information	Provide any countries other than the United States or Canada in which supplier operates (has an office, sells product or conducts any business) (indicate if none)							
OI.16	Organizational Information	Provide any countries other than the United States or Canada in which supplier's product (i.e. hardware, software, firmware or components) is manufactured or developed (indicate if none)							
OI.17	Organizational Information	Provide any countries other than the United States or Canada in which supplier's product (i.e. hardware, software, firmware or components) is assembled (indicate if none)							
OI.18	Organizational Information	Provide a summary for any pending or resolved product-related litigation in the last ten (10) years							
OI.19	Organizational Information	Provide any bonding company requests to intervene or make payments on supplier's behalf for any product manufacturing /development in the last ten (10) years							



Δ.



The Energy Sector Supply Chain Risk Questionnaire "The Questionnaire"

Available on the NATF Public Website:

https://www.natf.net/industry-initiatives/supply-chain-industry-coordination

Questionnaire Overview

- Posted on the NATF Public Website
- Formatted and Unformatted versions
- 223 Questions plus 20 General Information questions
- Three responses per question addressing:
 - Supplier Corporate Systems
 - Supplier Product
 - Product Development Systems
- Twelve categories:

Company Overview	Identity & Access Management
Change & Configuration Management	Mobile Devices & Applications
Cybersecurity Program Management	Risk Management
Cybersecurity Tools & Architecture	Supply Chain & External Dependencies Management
Data Protection	Vulnerability Management
Event & Incident Response	Workforce Management



Dina Mangialino (ConEd)

Questionnaire Mapping

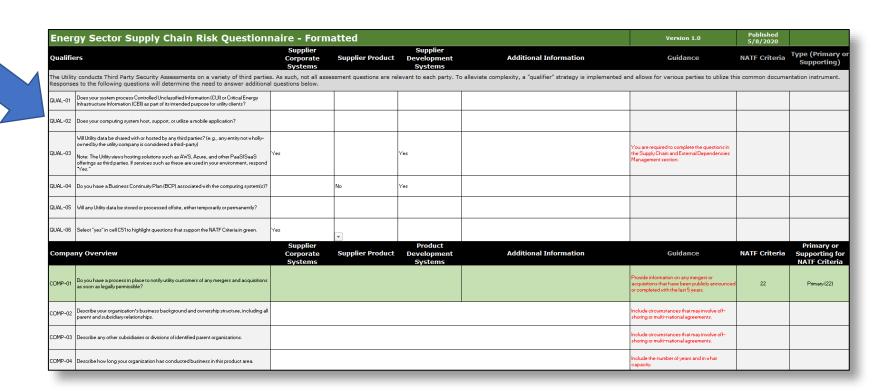
- To the NATF Criteria
 - All questions provide support information for the NATF Criteria; the key supporting questions are identified
- To existing frameworks/ standards

Energ	y Sector Supply Chain Risk Questionna	ire - Unfor	matte	d		Version 1.0	Published 5/8/2020	
AM-30	Do you have process(es) and procedure(s) documented, and currently followed, that require a review and update of the access-list(s) for privileged accounts?							
Cyberse	curity Program Management	Supplier Corporate Systems	ier	ct Devel	Additio nal Inform	GUIL	NATF Criteria	Primary or Supporting for NATF Criteria
CSPM-01	Do you have a business continuity plan (BCP) to support ongoing operations of your systems and scope of equipment and/or services provided to the entity?				ziinn		21	Primary (21) Supports (44)
CSPM-02	Are all components of the BCP reviewed at least annually and updated as needed to reflect change?							Supports (21)
SPM-03	Has your BCP been tested in the last year?							
CSPM-04	Does your organization have a data privacy policy that applies to your computing systems?							Supports (38)
CSPM-05	Have overall system and/or application architecture diagrams, including a full description of the data communications architecture, been developed and documented for the product(s) and/or service(s) being purchased?							Supports (56)
SPM-06	Do you have a media handling process (that is documented and currently implemented), including end-of-life, repurposing, and data sanitization procedures?						40	Primary (40) Supports (2)
SPM-07	Does your information protection program include secure deletion (e.g., degaussing/cryptographic wiping) or destruction of sensitive data, including archived or backed-up data?						46	Primary (46)
SPM-08	Do you have third-party assessment(s) and/or certification(s) you have conducted to assess your cybersecurity practices? If yes, please describe the assessment or certification, date last completed, and frequency of re-assessment in the Additional Information column.					Provide the findings reports from third-party verifications conducted for cyber security frameworks (provide the two most recent reports for each cyber security framework).	24	Primary (24)
SPM-09	Do you establish and maintain a security program for the your environment, including implemented processes to approve software, patches, and firmware prior to installation, as well as to verify the integrity and authenticity of the software, patches and firmware relevant to any technologies or equipment used in the development, manufacturing, testing, assembly, and distribution of the product(s) or service(s)?						54	Primary (54)



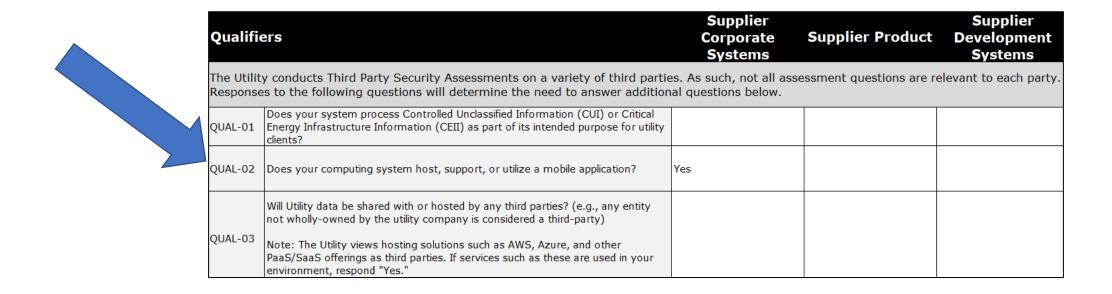
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 Selection of qualifiers will identify specific questions that could be optional or that support the NATF Criteria





 Selection of qualifiers will identify specific questions that could be optional or that support the NATF Criteria



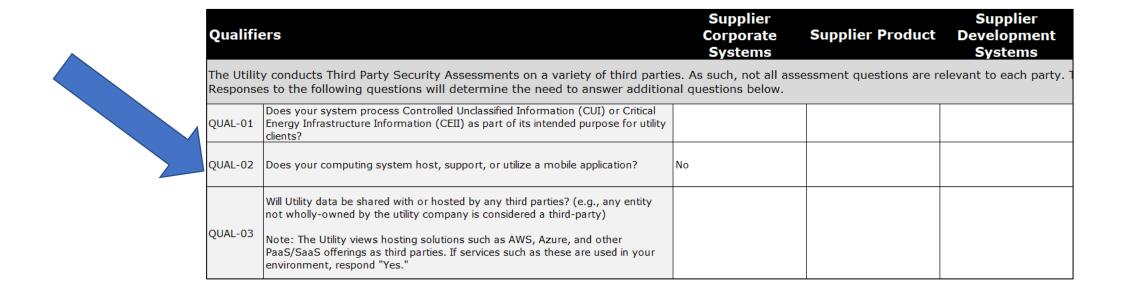


 Selection of qualifiers will identify specific questions that could be optional or that support the NATF Criteria

Mobile	Devices and Applications	Supplier Corporate Systems	Supplier Product	Product Development Systems
MOBL-01	Is a mobile application(s) part of the solution being provided to the utility?			
MOBL-02	Describe or provide a reference to the application's architecture and functionality.			
MOBL-03	Is the application available from a trusted source (e.g., iTunes App Store, Google Play Store, BB World)?			
MOBL-04	Does the application store, process, or transmit critical data, including operational information, personally identifiable information (PII), or critical energy infrastructure information (CEII)?			
MOBL-05	Will any sensitive data be stored on the mobile device or in device system logs?			
MOBL-06	Are employee mobile devices managed by your company's mobile device management (MDM) platform?			
MOBL-07	Are mobile devices that have been jailbroken allowed to be utilized?			
MOBL-08	Is utility's data encrypted in transport?			
MOBL-09	Is utility's data encrypted in storage?			
MOBL-10	Has the application been tested for vulnerabilities?			



 Selection of qualifiers will identify specific questions that could be optional or that support the NATF Criteria





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MOBL-09	Is utility's data encrypted in storage?			
MOBL-10	Has the application been tested for vulnerabilities?			



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The revision process will also keep the Criteria and Questionnaire current with the changing environment

Changing Environment - SCRM Government and Regulatory Actions - Specific to Power Industry

Document	Date Released	Date Comments Due	Link
Executive Order 13920	1-May-20		https://www.whitehouse.gov/presidential-actions/executive-order-securing-united-states-bulk-power-system/
DOE Executive Order Information			https://www.energy.gov/oe/bulkpowersystemexecutiveorder
FERC White Paper - Cyber Security Incentives	18-Jun-20	17-Aug-20	https://www.ferc.gov/sites/default/files/2020-06/notice-cybersecurity.pdf
FERC NOI - CIP Enhancements	24-Jun-20	24-Aug-20	https://www.federalregister.gov/documents/2020/06/24/2020- 13618/potential-enhancements-to-the-critical-infrastructure-protection- reliability-standards
DOE RFI - BPS Executive Order	8-Jul-20	24-Aug-20	https://www.federalregister.gov/documents/2020/07/08/2020- 14668/securing-the-united-states-bulk-power-system
NERC Alert - Supply Chain Risk	8-Jul-20	21-Aug-20	https://portal.natf.net/document-viewer?id={7b2edb47-a3f2-6307-be03-ff00005e4fde}
FERC NOI - Equipment and Services	17-Sep-20	23-Nov-20	https://www.federalregister.gov/documents/2020/09/23/2020- 20987/equipment-and-services-produced-or-provided-by-certain-entities- identified-as-risks-to-national



Changing Environment - Power Industry SCRM Interdependencies and the Need for Broadening Coordination

- ESCC
- Canada
- Gas Industry
- Telecom



Open Questions

Tony Eddleman (NPPD)
Dina Mangialino (ConEd)
Jack Cashin (APPA)







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Use of the Criteria and Questionnaire



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How you use the Criteria and Questionnaire depends upon your risk assessment process

Use of Criteria and Questionnaire in Supplier Risk Assessments

- Exelon Betsy Soehren-Jones
- NPPD Tony Eddleman
- Ameren Chuck Abell





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Based on your environment and based on the product interacts with your environment, you will have additional questions

How do you approach evaluations for supply chain cyber security?

- A. A risk-based approach
- B. Apply across the board to all suppliers and purchases







How do you determine where to conduct supply chain cyber security analysis?

Vote Now!



- A. Use a risk-based approach OT
- B. Use a risk-based approach OT and IT
- C. Apply to all suppliers and purchases or services -OT
- D. Apply to all suppliers and purchases or services -OT and IT



What do you use in your supplier evaluations?

- A. All of the NATF Criteria
- B. All of the questions in the Questionnaire
- C. All of the Criteria and Questionnaire
- All of the Criteria and Questionnaire plus additional questions
- E. Selected NATF Criteria
- F. Selected Questions in the Questionnaire
- G. Some of each a combination of selected Criteria and questions in the Questionnaire
- H. Some of each a combination of selected Criteria and questions in the Questionnaire plus additional questions
- I. My own questionnaire and I'm not sure if the Criteria or Questionnaire addresses my questions

Vote Now!





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Get the information that you need and are using

And help suppliers help us



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Solution Providers

Can assist getting information and conducting analysis, among other services

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Suppliers

Can provide you with verified information that you need and are using; you can help them help you

How to approach suppliers and solution providers with requests

Provide supplier with the NATF Criteria and/or Questionnaire and let them know what information you need

- <u>All</u> you are requesting responses to all criteria and questions
- All, but in stages you will be requesting responses to all of the criteria and questions, but in stages (i.e., you are using a "gate" system)
- <u>Some</u> If you don't need responses to all, add in a column for indicating and filtering the criteria and questions you want responses to
 - This helps suppliers recognize that you are using the Criteria and the Questionnaire
- <u>Additional or modified</u> If you want additional or modified information, put those criteria or questions in an addendum
 - Don't modify the Criteria or questions in the Questionnaire

Collect Information



45

Supplier Questionnaires

- Use the NATF Criteria and/or Questionnaire
- Adjust your risk assessment process for suppliers that are certified to accepted industry standards such as ISO-27001, IEC-62443, SOC2, NIST, etc. (e.g. adjust questionnaires and evaluation)
- Ensure that risk questionnaires are relevant to the products and services being provided by the supplier (e.g. don't use a cloud service IT questionnaire for an on-premise EMS system).
- Know ahead of time how you will evaluate the risk for all questions asked and what mitigations will be needed for negative responses from Suppliers



Collect Information

Open Questions



Betsy Soehren-Jones (Exelon)
Tony Eddleman (NPPD)
Chuck Abell (Ameren)
Tobias Whitney (Fortress A2V)
Rob Koziy (OSI)
Sam Chanoski (Hitachi-ABB)



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Revision Process for the Criteria and Questionnaire

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Industry Convergence

The NATF Criteria and Questionnaire should reflect the information that you need and are using

Let the Review Team know

- What information you are using or not using
- What Criteria or questions in the Questionnaire you want modified
- What additional information you requested

Collect Information



Convergence Request

- If not currently using the Questionnaire and Criteria
 - Compare content to your current tool
 - Determine if you are requesting information not addressed by Questionnaire or Criteria
 - Could a current question be modified?

Provide feedback to:

- <u>supplychain@natf.net</u> (preferrable)
- Or you can contact a team member

Collect Information



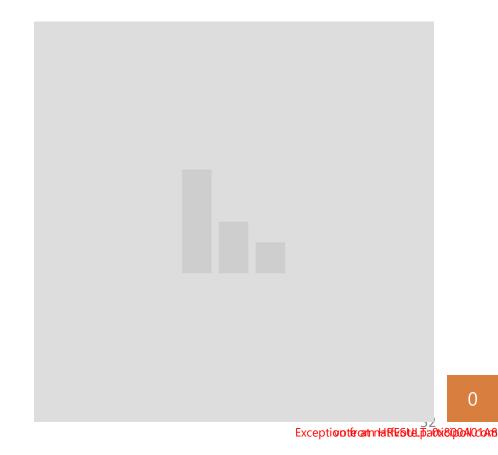
Will you provide feedback and input for the revision process?

- A. Yes
- B. No

Vote Now!



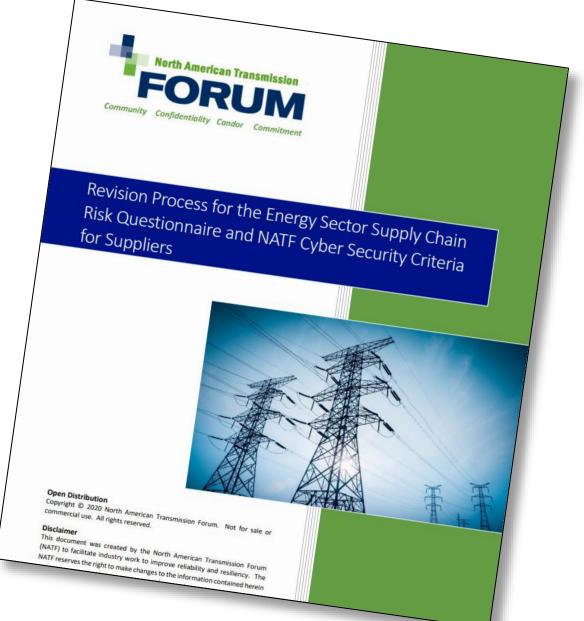




Mikhail Falkovich (ConEd)

The Revision Process

- Approved by the NATF Board
- Industry-wide process;
 NATF resources to maintain





Mikhail Falkovich (ConEd)

The Revision Process

 Is posted on the NATF public website/Industry **Coordination page** https://www.natf.net/ind ustry-initiatives/supplychain-industrycoordination





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The Revision Process

- The process establishes two teams
 - Review Team
 - Composed of members from across industry: entities, suppliers, assessors, solution providers
 - Advisory Team
 - Provides a resource for the Review Team to obtain additional opinions/insight
 - Composed of members from entities, trade organizations, and suppliers
- These teams are not hierarchical
- The Review Team may also reach out to the Industry Organizations Team for advice



Chuck Abell (Ameren)

Team Members

- Review team members
- Advisory team

Advisory Team	
Member	Company
Zohaib Hasan	ConEd
Laura Schepis	EEI/ESCC
Tony Eddleman	NATF Steering Team
Rob Koziy	OSI
Victor Calderon	SCE

Review Team	
Member	Company
Jeffrey Sweet	AEP, NATF Steering Team
Chuck Abell	Ameren, NATF Steering Team
Jack Cashin	APPA
Dina Mangialino	ConEd/DOE Working Group
Mikhail Falkovich	ConEd Working Group
James Chuber	Duke, NATF Steering Team
Mary Nettleton	Exelon
Betsy Soehren-Jones	Exelon, NATF Steering Team
Tobias Whitney	Fortress/A2V
Sam Chanoski	Hitachi ABB Power Grids
Jose Flores	NATF
Ken Keels	NATF
Scott Webb	Network and Security Technologies
Tony Eddleman	NPPD, NATF Steering Team
Rob Koziy	OSI
Steve McElwee	PJM, NATF Steering Team
Carl Phillips	PSEG
Jake Stricker	PWC
Roger Blakely	Santee Cooper
Frank Harrill	SEL
Shannon Hammett	Southern Co, NATF Steering Team
Barry Jones	WAPA
Dominick Forlenza	Xcel



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The Revision Process

The Criteria and Questionnaire will be updated annually

- January/February Review team reviews inputs
- March A redlined version is posted for 30 days for industry comments
- April/May Review team reviews and addresses comments
- May
 - Revised Criteria and Questionnaire are posted on the NATF public Industry Coordination webpage
 - The Review Team provides communication to industry



The Revision Process

The Review Team meets monthly to review inputs

 Inputs that are needed more urgently may be made prior to the annual update process

Inputs should be provided to NATF at

supplychain@natf.net





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It may not be possible to develop a set of Criteria or a single Questionnaire that addresses all information needs

So addendums may be needed, but let's get 90% of the way there!

Mikhail Falkovich (ConEd) Chuck Abell (Ameren)

Open Questions





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Thank you for attending!

NATF Contact Information

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