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Suppliers: Responding to Requests for Cyber Security Information

Brought to you by NATF and the Industry Organizations Team

December 1, 2020

NATF Members



95 members 78 affiliates

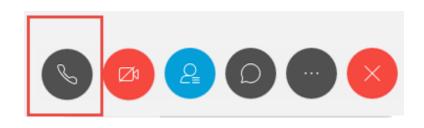
Member Types
IOUs
Federal/Provincial
Cooperatives
State/Municipal
ISOs/RTOs

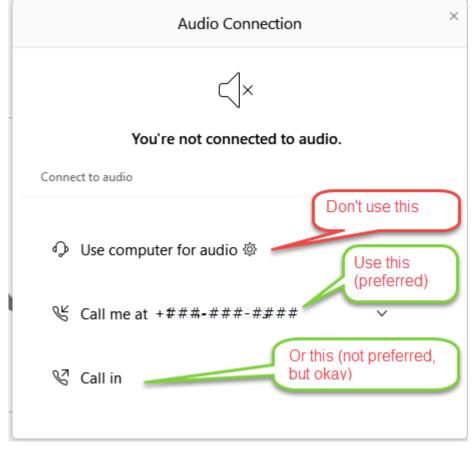
Coverage (US/Canada)
 ~85% miles 100 kV+
 ~90% net peak demand



Webex Audio Connection

- Select 📞 to connect to audio
 - Select the "Call me at..." option
 - Don't select "Use computer for audio" unless you have a headset and are familiar with using a VOIP connection
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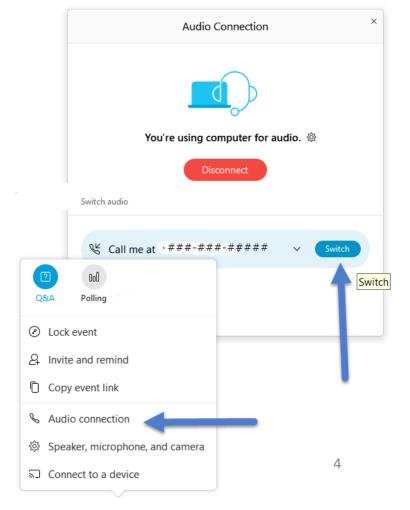




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- If you connect to audio the wrong way
 - Select the "More Options" menu
 - Select "Audio connection"
 - Select "Disconnect" or select "Switch" next to "Call me at..."

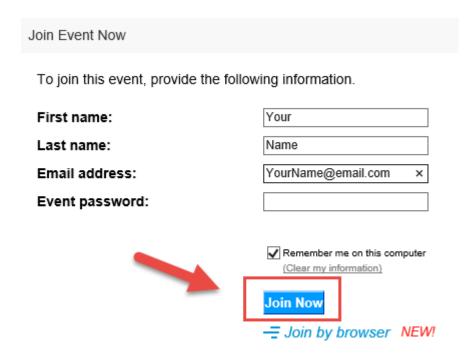


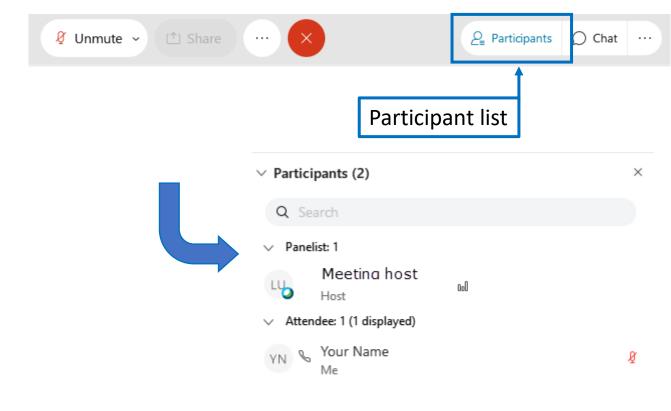




Raising Your Hand

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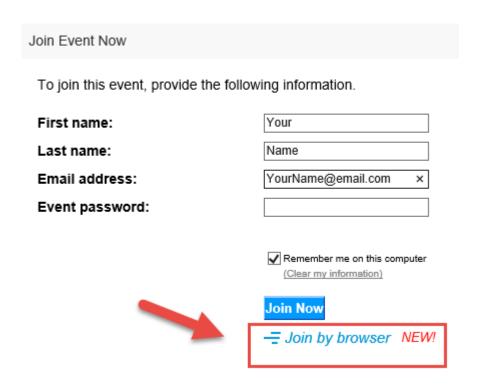


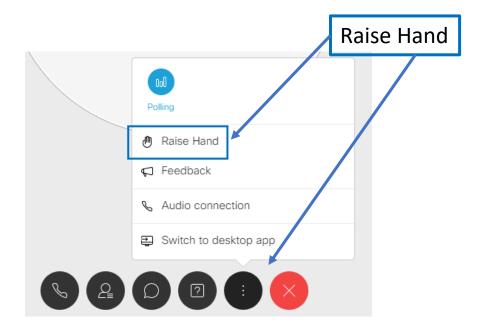




Raising Your Hand

If you joined by browser:







6

Audio for Discussion

- We will unmute lines for discussion
- During this time, you'll control your own mute
 - Select of to mute, or locally mute on your phone



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Agenda Overview

- Background and Benefits
- The Industry Organizations Team and Model
- Overview of the Criteria and Questionnaire
- How suppliers can use the Criteria and Questionnaire
- The Revision Process
- Polls





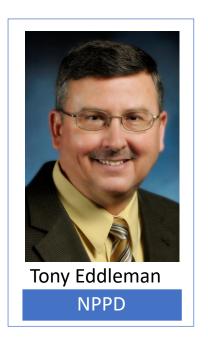
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Today's Presenters - Industry



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Background Why suppliers are getting requests

Security Heightened by Regulatory Activity

- Entities are more aware of the risks that could be introduced via supply chain
- These concerns are heightened by
 - New NERC supply chain regulations that became enforceable on October 1, 2020
 - The Executive Order 13920 issued on May 1, 2020

Collect Information



May 1 Executive Order

- Executive Order (EO) 13920, "Securing the United States Bulk-Power System"
 - Authorizes U.S. Secretary of Energy to work with the Cabinet and the energy industry to secure America's bulk-power system (BPS).
- Four Pillars
 - Prohibit foreign adversaries from providing products where there is a risk that relates to national security
 - 2. Establishes the ability for a pre-qualification for suppliers (criteria)
 - 3. Identifying things on the system that are at risk today
 - 4. Establishment of a Task Force



Government and Regulatory Actions

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



Coming Together to Address Concerns Benefits Suppliers

Inclusivity

- The Model is based on inclusivity of all suppliers
- Designed to help you and your customers identify risks
- You can work with your customers to mitigate those risks

Efficiency and Effectiveness

- When your customers are asking the same questions, you can be prepared with
 - Responses
 - Verification for your responses
- Making your customers satisfied and confident





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NATF and the Industry **Organizations Team**

Formed Fall 2019

Industry Organization Team Members

Organizations, Forums and Working Groups

- AGA
- CEA
- EEI
- LPPC
- APPA
- TAPS
- NAGF
- NAESB
- ConEd Working Group
- NERC CCC/RSTC/SCWG
- 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 Tony Eddleman (NPPD)



Customers Collecting Information

Collect it from Suppliers themselves

- NATF Cyber Security Criteria for Suppliers
- Energy Sector Supply Chain Questionnaire
- Supplement with
 - Historical knowledge
 - Open-source research

Use a solution-provider service

Also need to verify or obtain assurance of accuracy

Collect Information



Methods Customers May Use 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 their own validation/verification

 Obtain evidence from supplier to conduct your own validation/verification

Collect Information



Available Today

NATF Criteria

- 60 Criteria for suppliers' supply chain cyber security practices
- 24 Organization Information considerations

Energy Sector Supply Chain Risk Questionnaire

- 223 cyber security questions
- 20 general information questions

Supplier Assessment Model

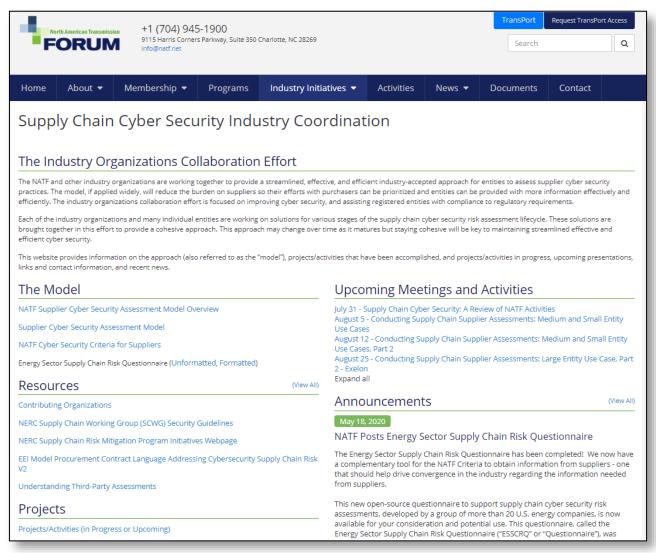
Model for assessing suppliers' cyber security practices

EEI Procurement Language

Sample contract language to mitigate risk and provide assurances of supplier performance



NATF-hosted Industry Organizations Web Page







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Overview of the **NATF Criteria and Questionnaire**

What you can expect to see



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	•	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						





The Energy Sector Supply Chain Risk Questionnaire "The Questionnaire"

Available on the NATE Public Website:

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

Mikhail Falkovich (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 Produ	ct	Additio nal Inform	Guile	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?						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)
CSPM-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)
CSPM-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)
CSPM-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)
CSPM-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)



30

Questionnaire Overview

- Posted on the NATF Public Website
- Formatted and Unformatted versions
- 223 Questions plus 20 General Information questions
- 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



Questions for three areas

- Supplier Corporate Systems
- Supplier Product
- Supplier Development Systems

Qualifie	ers	Supplier Corporate Systems	Supplier Product	Supplier Development Systems	
	y conducts Third Party Security Assessments on a variety of third parties as to the following questions will determine the need to answer additional		essment questions a	t to each party. To	alleviate o
QUAL-01	Does your system process Controlled Unclassified Information (CUI) or Critical Energy Infrastructure Information (CEII) as part of its intended purpose for utility clients?				
LIAL OO	Does your computing system host, support, or utilize a mobile application?				
UAL-02					



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Completing the Questionnaire

Mikhail Falkovich (ConEd)

- Complete questions for Supplier
 Corporate Systems (yes/no/free form)
- Determine whether responses to Corporate Systems applies to Product
 - If yes, indicate yes, no or "same"
 - If not, respond to Product questions
- Determine whether responses to either Corporate Systems or Product applies to the Product Development system
 - If yes, indicate yes, no or "same as CS, or same as P" for free-form questions
 - If not, respond to Product Development
 System questions

	Supplier Corporate Systems	Supplier Product	Product Development Systems	
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r				



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Use of the NATF Criteria and Questionnaire

Supplier's Use

- Have responses prepared for the NATF Criteria and Questionnaire
- Determine what verification you will provide
 - A third-party verification
 - Evidence to support responses
 - Suggest the use of a solution provider
- If you don't have responses prepared
 - Ask if the customer would start with responses to the NATF Criteria
 - See what are the most critical responses customer needs
 - Ask if the customer is using a gate system, so you could provide some responses now and some at a later point in time



Customers' needs may vary

- Customers may not need responses to all the questions; it depends upon how each company is conducting risk assessments
- We are working with companies to encourage them to tell you:
 - <u>All</u> if they need responses to all criteria and/or questions
 - All, but in stages they will need responses to all the criteria and questions, but they will be requesting them in stages (i.e., they may be using a "gate" system)
 - <u>Some</u> If they don't need responses to all, they should add a column for indicating the criteria and/or questions they want responses to, or use the formatted questionnaire filters
 - This will help you recognize that they are using the Criteria and the Questionnaire, so you can
 use your developed responses
 - They may ask, or you can determine, whether it is more efficient to just provide all the responses
 - Additional or modified If they want additional or modified information, those criteria or
 questions should be provided in an addendum. We are asking entities not to modify the Criteria or
 questions in the Questionnaire





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The Revision Process for the NATF Criteria and Questionnaire

Open Distribution

Industry Convergence

- Aligning industry on the information
 - that is being asked of suppliers and
 - is used when conducting risk assessments
- Suppliers can participate in the review process
- Provide feedback to:
 - supplychain@natf.net





Betsy Soehren-Jones (Exelon)

The Revision Process

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





The Revision Process

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





Open Distribution

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





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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!

NATF Contact Information

supplychain@natf.net

kkeels@natf.net

vagnew@natf.net



Valerie Agnew (NATF)

Was today helpful?

Was this introduction to the NATF Criteria and Questionnaire helpful?



- A. Yes
- B. No
- C. I need more information



Would you be interested in another webinar to interact with the <u>suppliers</u> that have been involved?

Would you be interested in a future webinar to hear from and interact with the suppliers on the Industry Organizations' Team?



- A. Yes
- B. No
- C. Maybe



Would you be interested in another webinar to interact with the solution providers that have been involved?

Would you be interested in a future webinar to hear from and interact with the solution providers on the Industry Organizations' Team?



- A. Yes
- B. No
- C. Maybe



This webinar will be provided again

January 12, 2021 1:00-2:00pm Eastern Time

Send questions you'd like to have addressed

Thank you for attending!

Valerie Agnew (NATF)





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