Unofficial Comment Form

Project 2020-03 Supply Chain Low Impact Revisions

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Project 2020-03 Supply Chain Low Impact Revisions** by **8 p.m. Eastern, Monday, April 11, 2022.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project202004ModificationstoCIP-012.aspx). If you have questions, contact Senior Standards Developer, Alison Oswald (via email), or at 404-446-9668.

## Background Information

## In its final report accepted by the NERC Board in May 2019, NERC documented the results of the evaluation of supply chain risks associated with certain categories of assets not currently subject to the Supply Chain Standards and recommended actions to address those risks. NERC staff recommended further study to determine whether new information supports modifying the standards to include low impact BES Cyber Systems with external connectivity by issuing a request for data or information pursuant to Section 1600 of the NERC Rules of Procedure.

The Board approved the formal issuance of this data request on August 15, 2019. NERC collected the data from August 19 through October 3, 2019. A final report, *Supply Chain Risk Assessment*, was published in December 2019.  The report recommended the modification of the Supply Chain Standards to include low impact BES Cyber Systems with remote electronic access connectivity.  Further, industry feedback was received regarding this recommendation at the February 2020 NERC Board meeting through [MRC Policy Input](https://www.nerc.com/gov/bot/Agenda%20highlights%20and%20Mintues%202013/Policy-Input-Package-February-2020-PUBLIC-POSTING.pdf).

After considering policy input, the NERC Board adopted a resolution to initiate a project 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.

## Questions

1. Do you agree the updated language proposed in Attachment 1 Section 6 addresses the risk of malicious communication and vendor remote access to low impact BES cyber systems as directed by the [NERC Board resolution](https://www.nerc.com/gov/bot/Agenda%20highlights%20and%20Mintues%202013/Approved_Resolution_%20Supply%20Chain%20Follow%20Up%20%282-6-2020%29.pdf)? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. The standard drafting team (SDT) believes that remote access is a widely used and understood term. The team has added clarifying language to limit the scope of this access to remote access that is conducted by vendors. Do you believe that this language is clear? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. Has the SDT clarified that Attachment 1 Section 6 only addresses vendor’s access to low impact assets containing BES cyber systems from remote locations? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. Do you believe the language in Attachment 1 Section 6 limits the scope to low impact BES cyber systems? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. Do the examples in Attachment 2 Section 6 support your understanding of what is required in Attachment 1 Section 6? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. The SDT proposes that the modifications in CIP-003-X meet the NERC Board resolution in a cost effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. The SDT is proposing an 18-month implementation plan for Attachment 1, Section 6.1 and 6.2. The proposed implementation time frame for Attachment 1, Section 6.3 is 24-months. Would these proposed timeframes give enough time to put into place process, procedures or technology to meet the proposed language in Section 6? If you think an alternate timeframe is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.

[ ]  Yes

[ ]  No

Comments:

1. Provide any additional comments on the standard and technical rationale document for the standard drafting team to consider, if desired.

Comments: