WELCOME TO TECHNICAL TALK WITH RF

September 9, 2024



TECHNICAL TALK WITH RF

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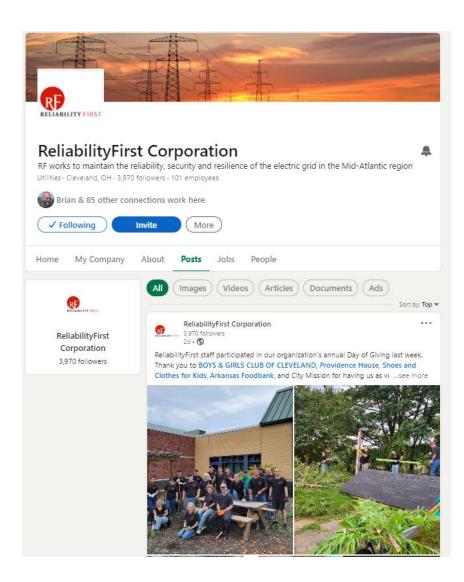
#TechTalkRF

TECHNICAL TALK WITH RF

Follow us on



Linkedin.com/company/reliabilityfirst-corporation



TECH TALK REMINDERS

Please keep your information up-to-date

• CORES and Generation Verification Forms

Following an event, send EOP-004 or OE-417 forms to disturbance@rfirst.org

CIP-008-6 incident reports are sent to the <u>E-ISAC</u> and the <u>DHS CISA</u>

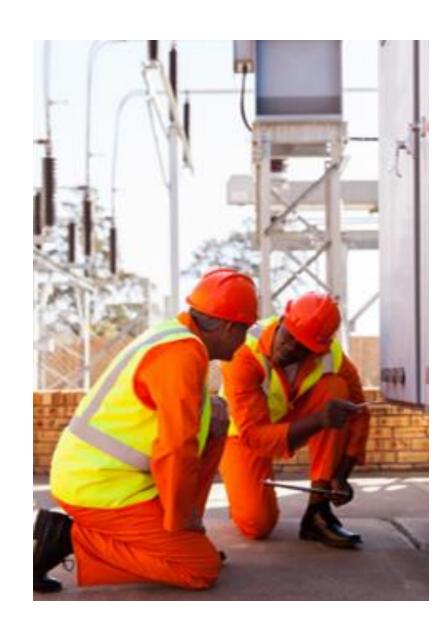
Check our <u>monthly CMEP update</u> and <u>newsletter</u>:

- 2024 ERO Periodic Data Submittal schedule
- Timing of Standard effectiveness

BES Cyber System Categorization (CIP-002-5.1a)

 Assess categorization (low, medium, or high) regularly and notify us of changes

CIP Evidence Request Tool V8.1 was released and is on NERC's <u>website</u>

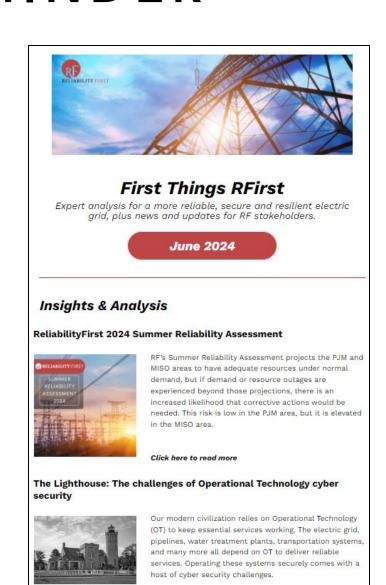


TECH TALK REMINDER

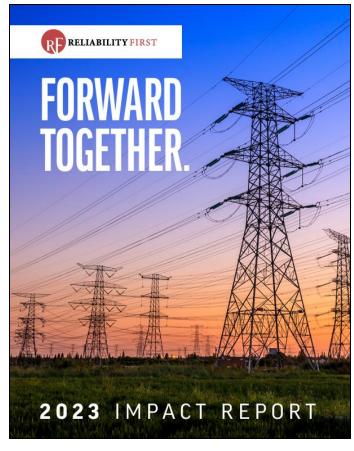
Are you getting our newsletter *First Things RFirst?*

- Sign up today <u>here</u> -

Also, make sure to check out our **2023 Impact Report**



Click here to read more



WELCOME TO TECHNICAL TALK WITH RF

September 9, 2024



TECH TALK ANNOUNCEMENT



2024 Interregional Transfer Capability Study Phase 1

2024 ITCS Phase 1 Assessment

NERC published the second in a series of three draft documents that will be merged into the final Interregional Transfer Capability Study (ITCS), which is being produced in response to the congressional directive in the Fiscal Responsibility Act of 2023. The study will be filed with the Federal Energy Regulatory Commission (FERC) by December 2, 2024, and will be followed by a FERC public comment period.



TECH TALK ANNOUNCEMENT











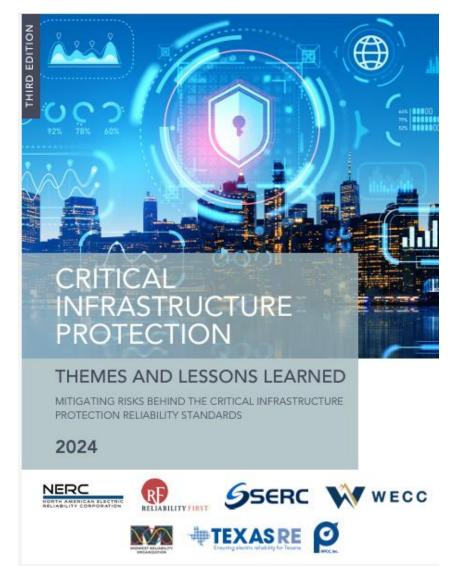




Critical Infrastructure Protection Themes And Lessons Learned

CIP Themes Report

NERC and the six Regional Entities (collectively the ERO Enterprise) have identified four risk themes that have made it difficult for some entities to mitigate risks associated with the NERC Critical Infrastructure Protection (CIP) Reliability Standards. To communicate these themes and possible resolutions to them, the ERO Enterprise developed the **2024 Critical Infrastructure Protection Themes** and Lessons Learned report.



TECH TALK ANNOUNCEMENT



Physical Security Regional Workshop

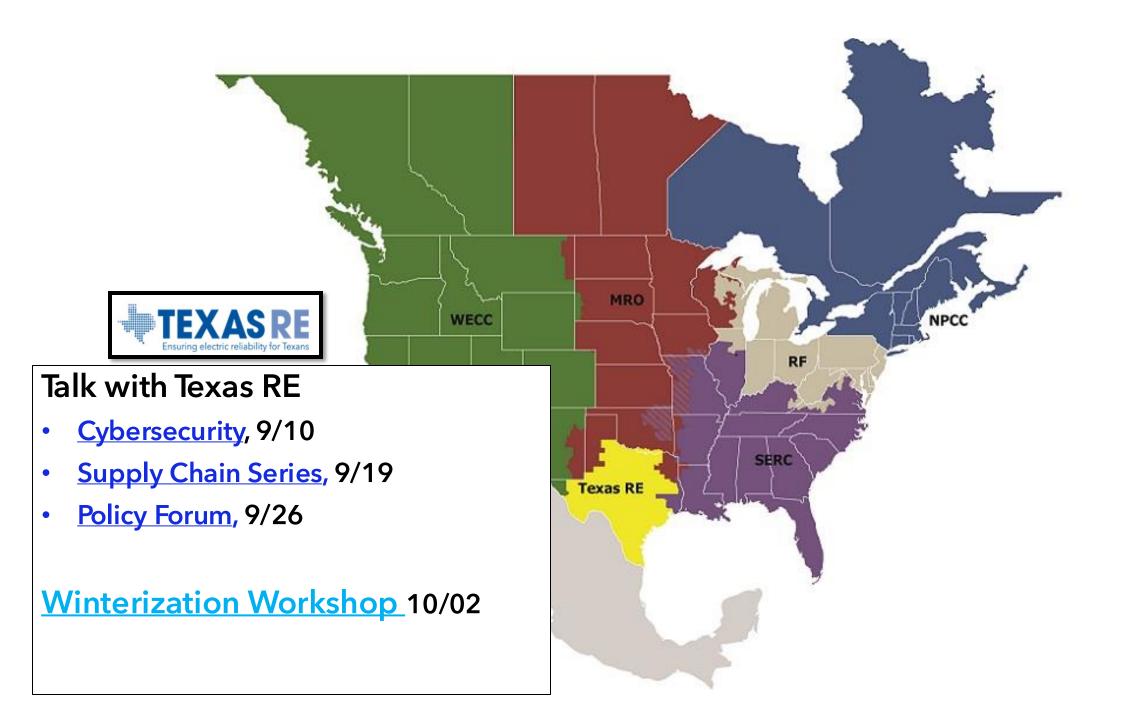
Registration

September 25, 8:30-5:00 PM CT

E-ISAC is partnering with ReliabilityFirst, EPRI, ComEd, Edison Electric Institute, the National Rural Electric Cooperative Association and the American Public Power Association to host this regional physical security workshop. In response to the evolving physical threat environment impacting the electric industry, we invite you to join a free discussion about the current threat landscape, mitigation strategies, and lessons learned.

Registration is free and is open to utilities, select government and law enforcement partners. This is an in-person only event, travel and accommodations are not included in participant registration. Lunch will be provided. This workshop is not open to the media.



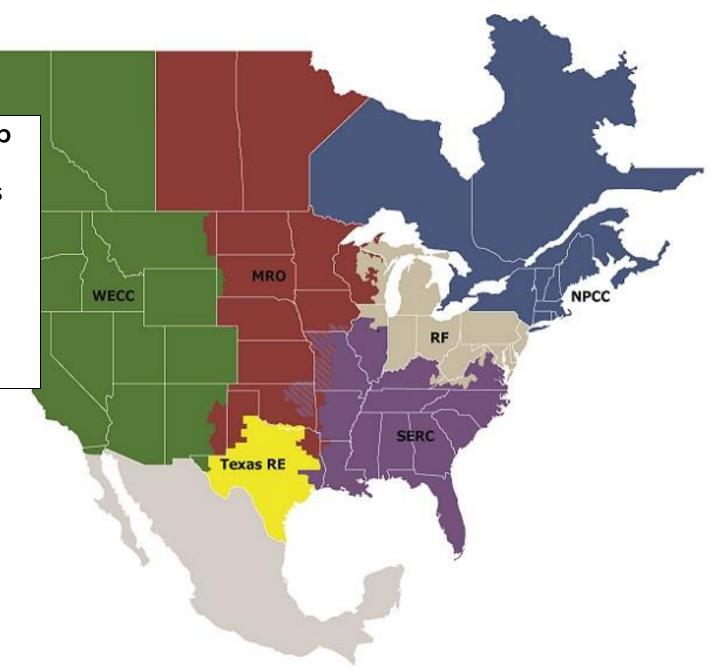




Winter Readiness Workshop

• <u>September 10</u> Enforcement Fundamentals

• September 11-12 Reliability & Security Oversight Update
• September 19



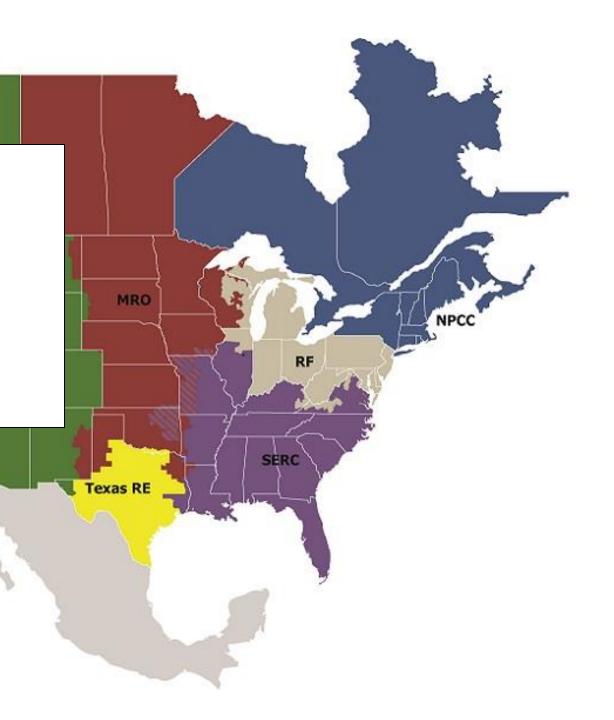


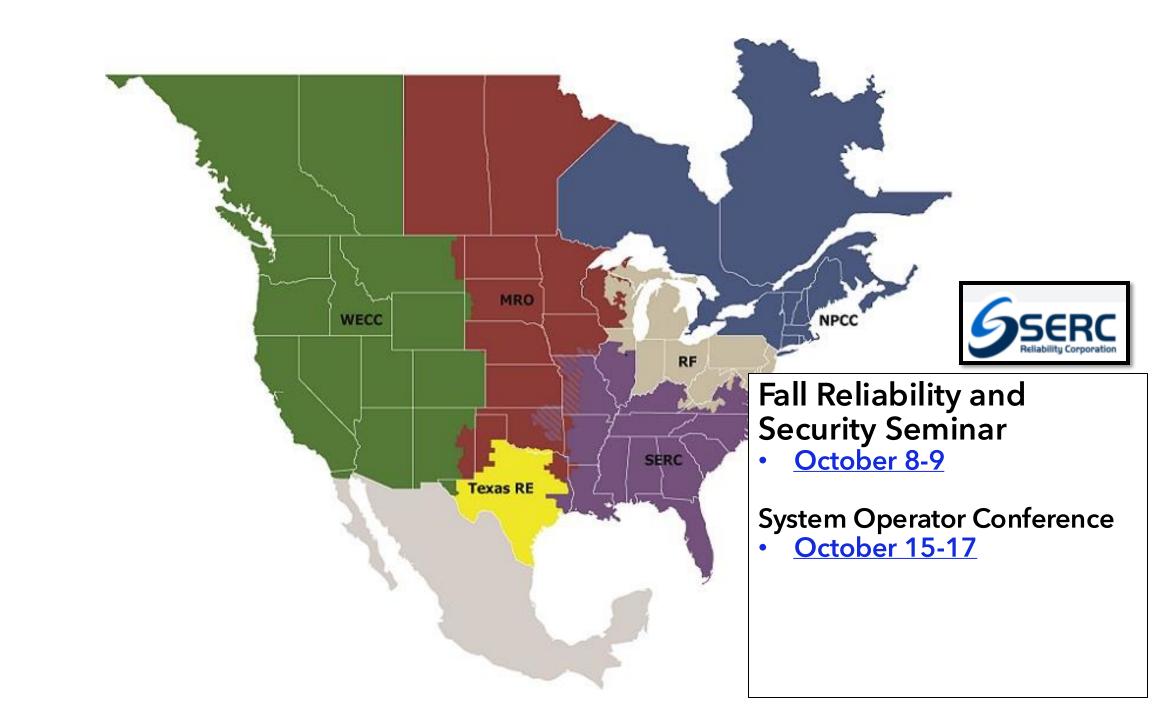
2024 MRO Security Conference (Hybrid)

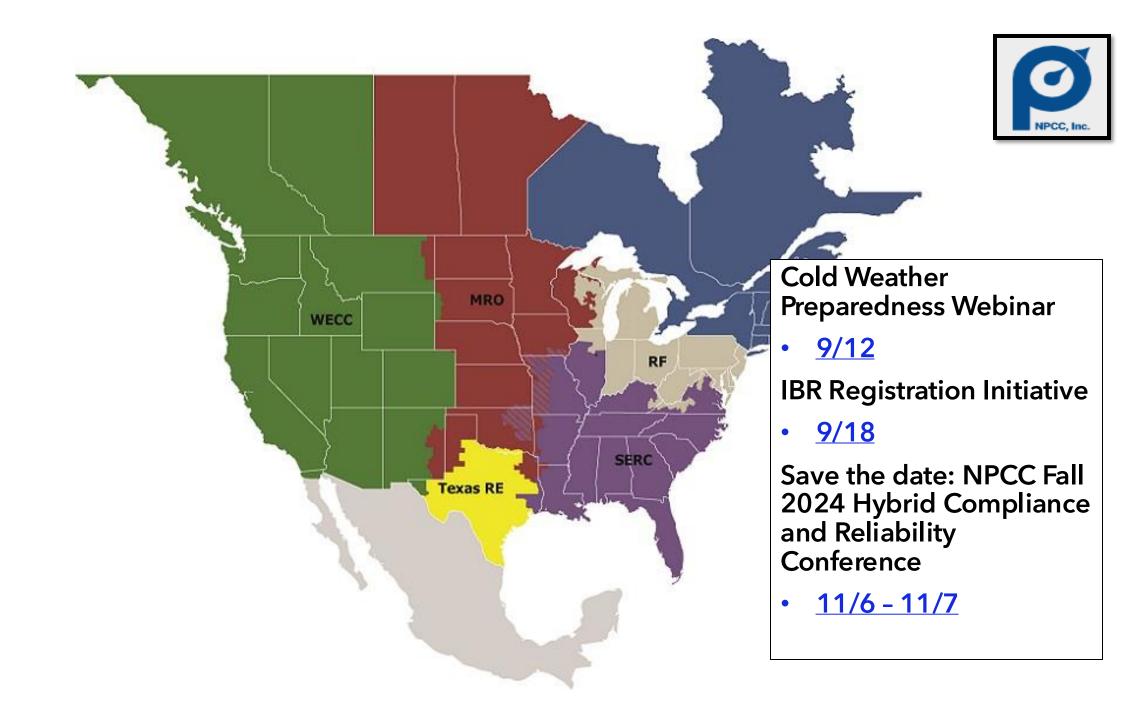
• October 1-3

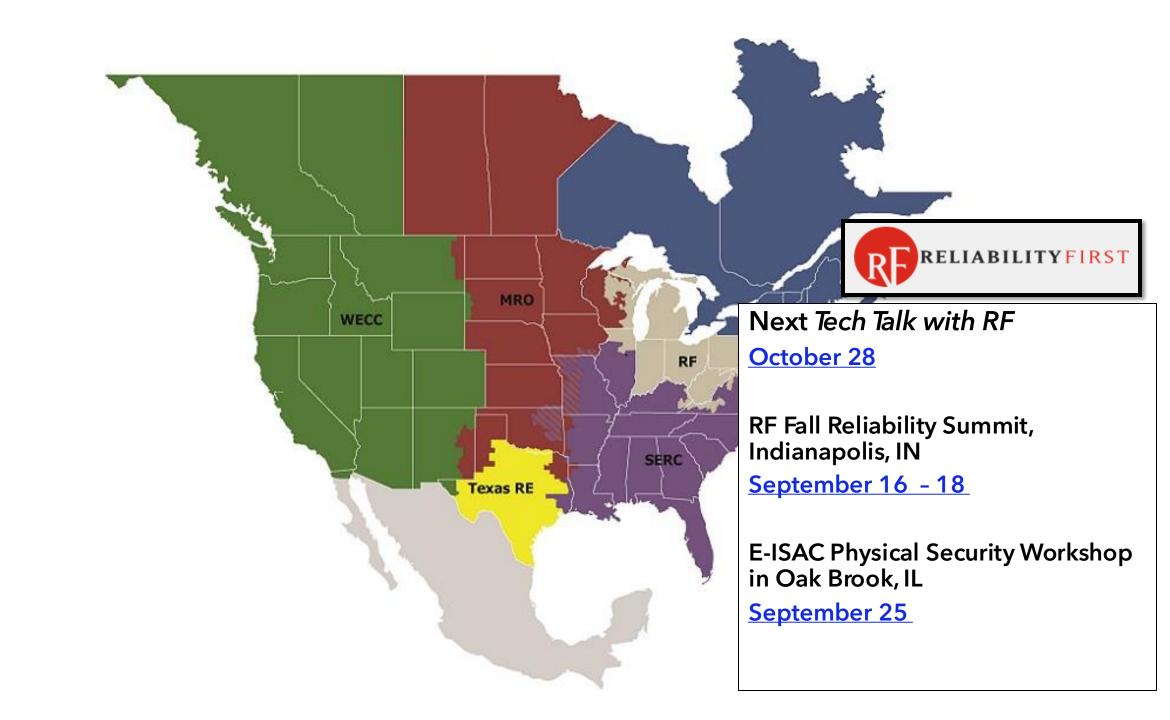
GridSecCon 2024

October 22nd - 25th









TECH TALK ANNOUNCEMENT



FALL RELIABILITY & SECURITY SUMMIT





Featuring an energy policy legislator panel with:

Brian Feldman Maryland State Senator



Stephanie Hansen Delaware State Senator



Eric Koch Indiana State Senator

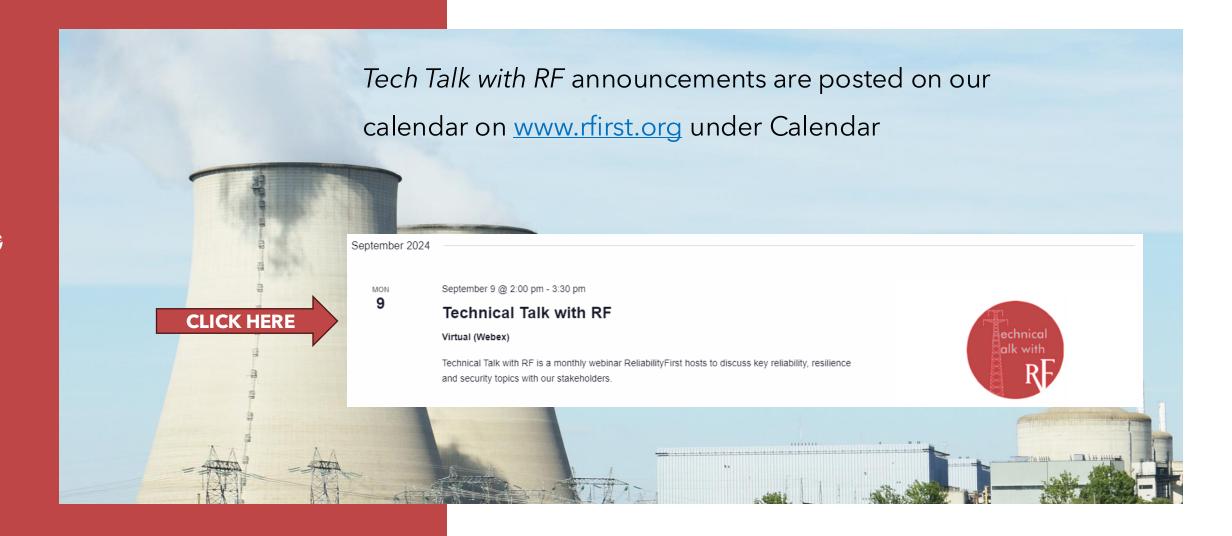


Dick SteinOhio State Representative





TECH TALK REMINDER



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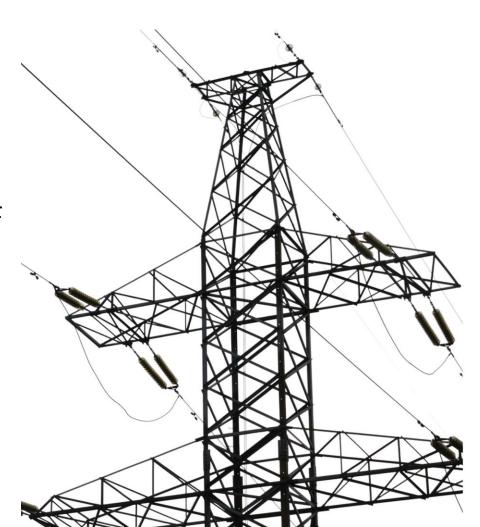
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Anti-Trust Statement

It is ReliabilityFirst's policy and practice to obey the antitrust laws and to avoid all conduct that unreasonably restrains competition. This policy requires the avoidance of any conduct which violates, or which might appear to violate, the antitrust laws. Among other things, the antitrust laws forbid any agreement between or among competitors regarding prices, availability of service, product design, terms of sale, division of markets, allocation of customers or any other activity that unreasonably restrains competition.

It is the responsibility of every ReliabilityFirst participant and employee who may in any way affect ReliabilityFirst's compliance with the antitrust laws to carry out this policy.





AGENDA

EVENT ANALYSIS UPDATE

DWAYNE FEWLESS, PRINCIPAL ANALYST, OPERATIONAL ANALYSIS & AWARENESS, RF

RISK ASSESSMENT GUIDELINES OVERVIEW

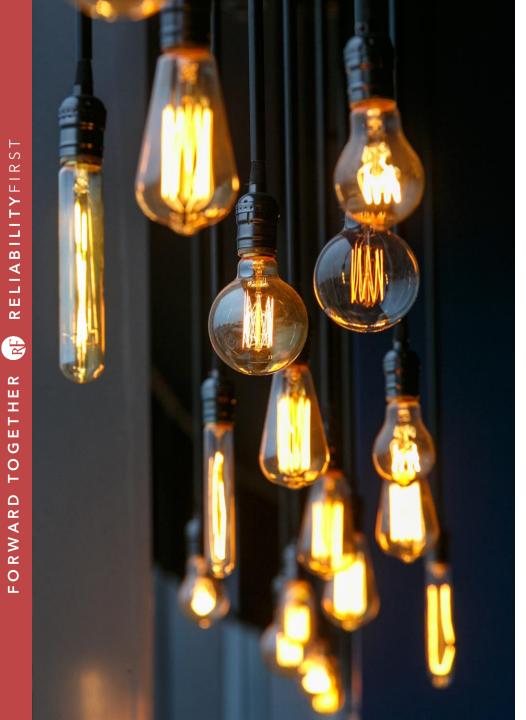
SHAWN BARRETT, PRINCIPAL ANALYST, RISK ANALYSIS & MITIGATION, RF

EAP V5 AND THE EVENT ANALYSIS PROCESS

Dwayne Fewless, Principal Analyst,
Operational Analysis and Awareness, RF

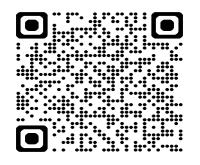
Tech Talk with RF, Sept. 9, 2024





AGENDA

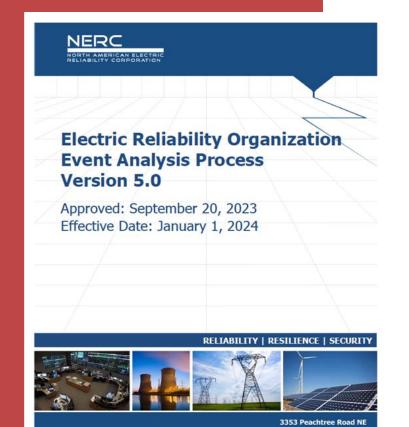
- EAP V5 UPDATE THEMES
- NERC LESSONS LEARNED
- EVENT ANALYSIS AND THE RF REGION



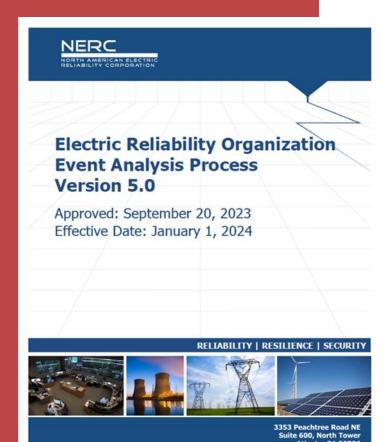
EAP V5 UPDATE THEMES

 Events Analysis Subcommittee (EAS)-Led Periodic Review

- Industry Comment Period
 - April 5 May 19, 2023
- 57 Comments from 10 different entities



EAP V5 UPDATE THEMES



- Update the Introduction section to provide additional background information regarding the Event Analysis Program - "Why"
- Update the Process Overview section to provide additional background information regarding the Event Analysis Process - "How"
- Revise the ERO Event Analysis Process section to provide clarity and describe changes to event categorization definitions that include the following...

EAP V5 UPDATE THEMES



RETIRE

- Retire Category 1b
- Retire Category 1d



REVISE

- Revise Category 1e, 2e, 2f, and 2g definitions to provide clarity
- Revise Category 1h definition in accordance with the recommendation of the EMS Working Group to provide clarity



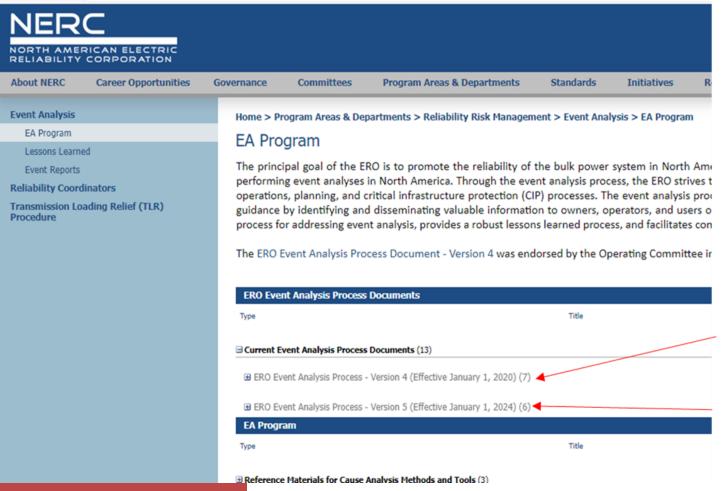
COMBINE

 Combine Categories 3, 4, & 5 into a single Category 3





EAP V5 SUPPORTING MATERIAL

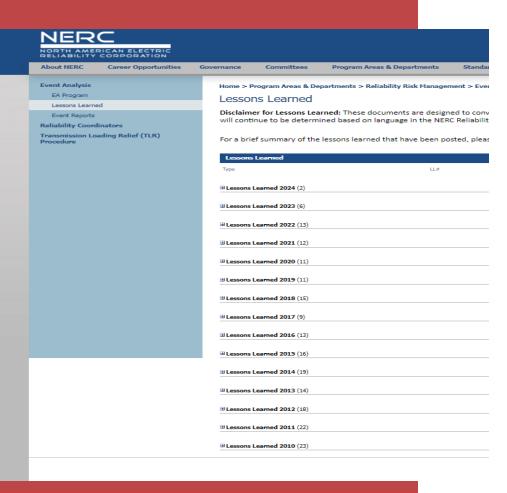


Previous version, EAP V4

EAP V5, effective Jan. 1, 2024



NERC LESSONS LEARNED

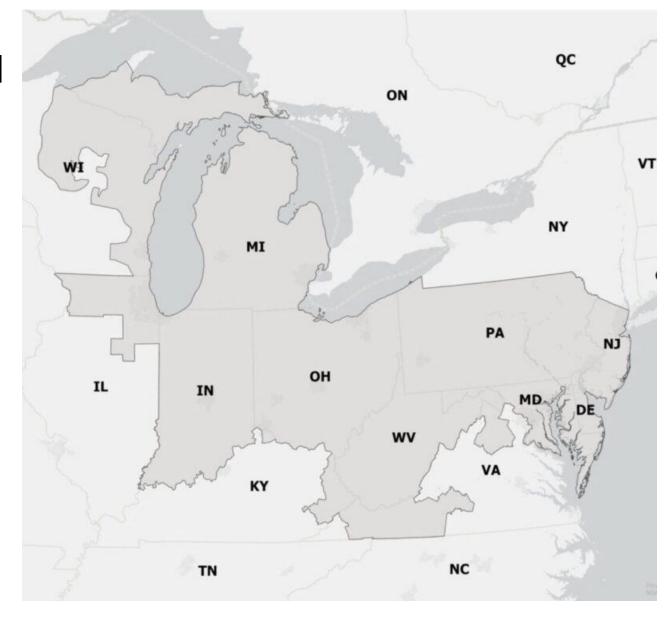


NERC Lessons Learned

- Events that industry can learn from
- Completely anonymous
- Written as a combined team

EVENTS ANALYSIS AND THE RF REGION

- The process
- The codes
- Inside of RF events



THE PROCESS

Event reported

- EOP-004
- OE-417



OAA reaches out about event

- Categorization
- Reporting timing



Internal analysis



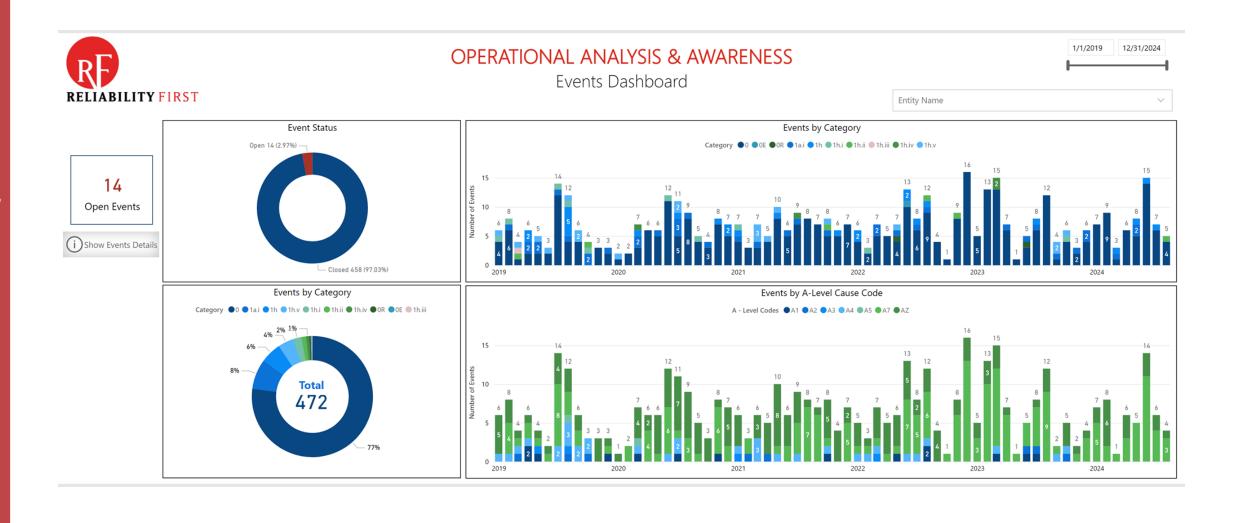
External collaboration

ANALYSIS & CAUSE CODING

- A1 Design and Engineering
- A2 Equipment and Maintenance
- A3 Individual Human Performance
- A4 Management/Organization
- **A5** Communications
- A6 Training
- **A7** Other
- AZ Information to determine cause LTA

FORWARD TOGETHE

INSIDE RF EVENTS



INSIDE RF EVENTS



OPERATIONAL ANALYSIS & AWARENESS

Event Characteristics Dashboard

Total Events

Affected Customers (As Reported by Entity)

All

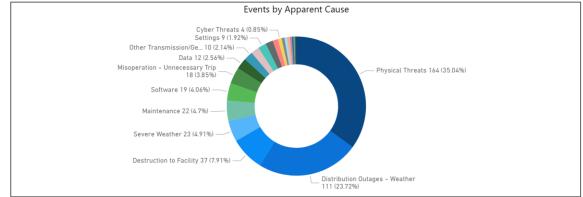
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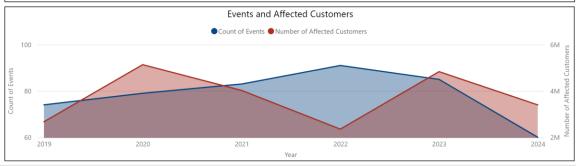
All

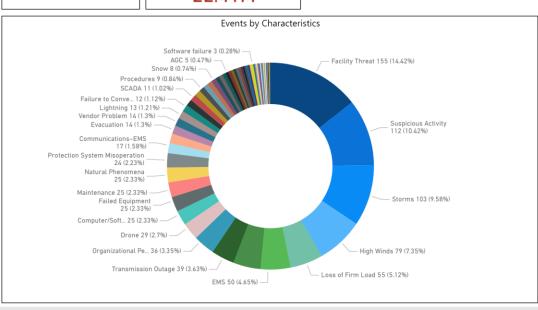
Entity Name

1/1/2019

12/31/2024

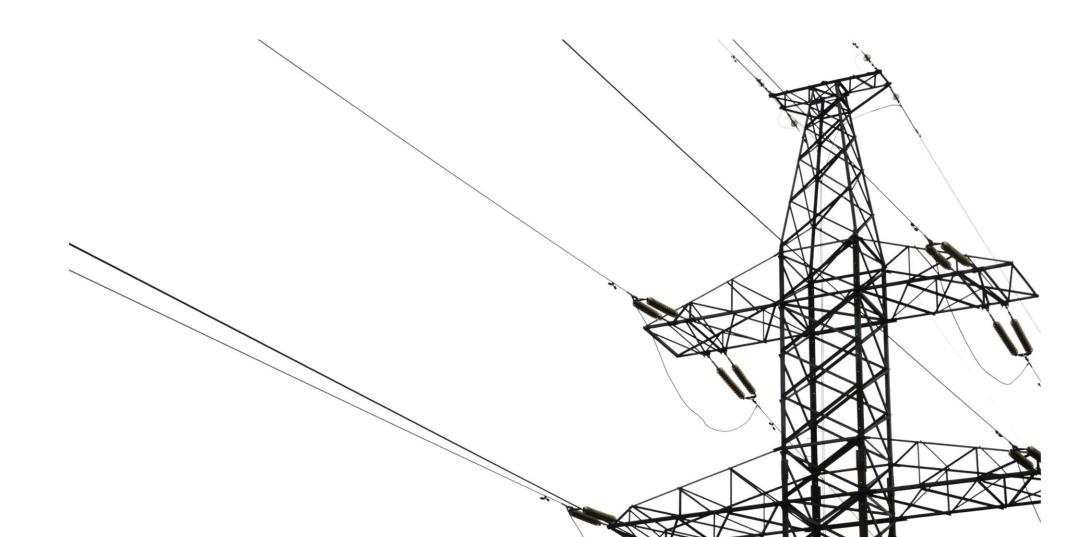






"Coming together is a beginning. Keeping together is progress. Working together is success."

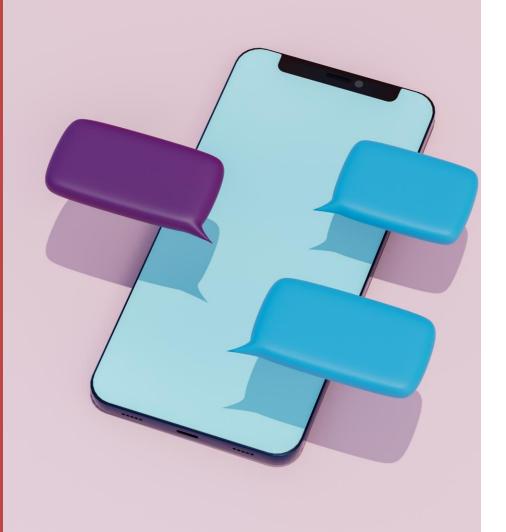
-Henry Ford





RF STRATEGY FOR IMPROVEMENT

- COLLABORATIVE ANALYSIS OF EVENTS (EA)
- NERC LESSONS LEARNED
- RF ASSIST VISITS
- RF WORKSHOPS
- NERC SITUATIONAL AWARENESS & MONITORING WORKSHOPS



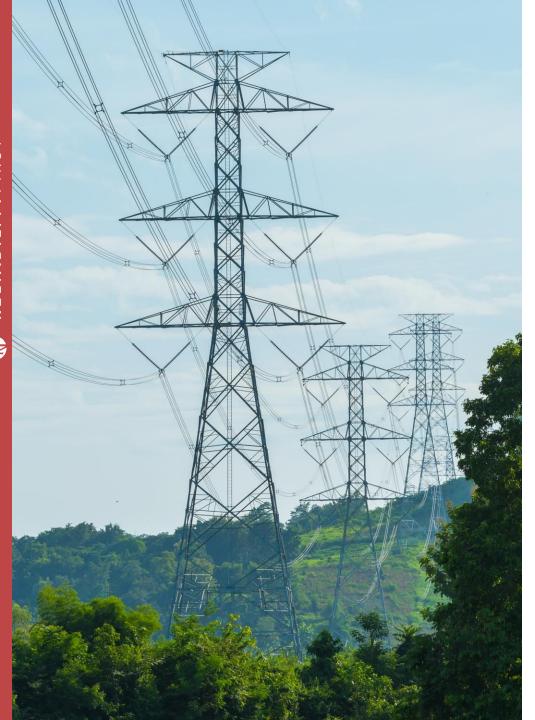
REPORTING AN EVENT TO RF

- Disturbance mailbox
 - disturbance@rfirst.org
- Unable to email -
 - Business hours 216.503.0600
 - After hours 216.503.0646



RF EVENTS ANALYSIS CONTACTS

- Dwayne Fewless Principal Analyst
 - dwayne.fewless@rfirst.org
 - 216.503.0671
- Darren Schue Senior Analyst
 - darren.schue@rfirst.org
 - 216.503.0622
- Danielle Daugherty Analyst
 - danielle.daugherty@rfirst.org
 - 216.503.0602



QUESTIONS & ANSWERS

Dwayne Fewless,

Dwayne.Fewless@rfirst.org

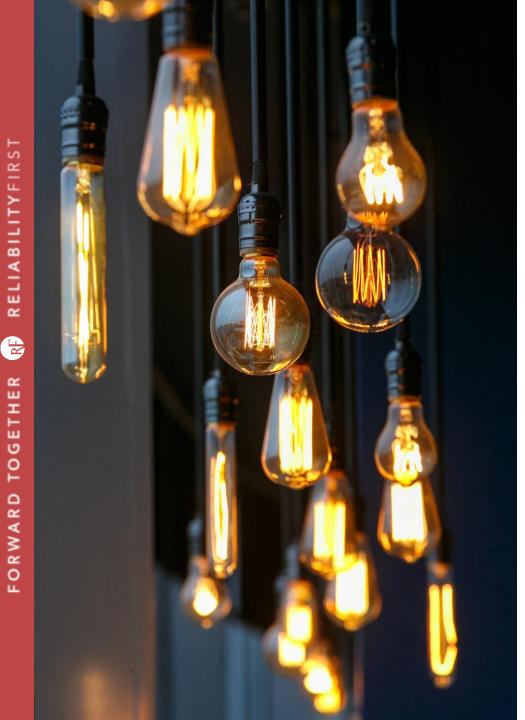
EVENT ANALYSIS LINKS

- NERC EA Program
 - https://www.nerc.com/pa/rrm/ea/Pages/EA-Program.aspx
- NERC Lessons Learned:
 - Lessons Learned (nerc.com)
- RF EA guidance Page:
 - https://www.rfirst.org/events-data-requests/event-reporting/

RF RISK ASSESSMENT GUIDELINE

Shawn Barrett, Principal Analyst, Risk Analysis and Mitigation, RF

Sept. 9, 2024



INTRODUCTION

- RISK ASSESSMENT OVERVIEW
- QUALIFIED SUBJECT MATTER EXPERTS
- RISK ASSESSMENT PROCESS
- ASSESSING POTENTIAL HARM
- ASSESSING LIKELIHOOD OF OCCURRENCE
- CONSIDERING MITIGATION
- SUMMARY

RISK ASSESSMENT OVERVIEW

- The North American Electric Reliability Corporation (NERC) requires entities to include a risk assessment with all self-reported potential non-compliances
- Risk assessments are the product of a documented process that consistently analyzes four key considerations:



Threats

&



Vulnerabilities



Potential Harm



Likelihood of harm

QUALIFIED SUBJECT MATTER EXPERTS

- > Risk assessments are inherently difficult and imprecise
- ➤ It is strongly recommended that trained and experienced SMEs perform the assessments
- > Two key areas of training required of SMEs:
 - 1. Technical training in the equipment and technologies, especially in understanding their vulnerabilities
 - 2. Training in making estimates



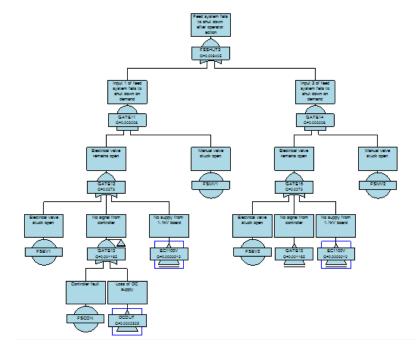
RISK ASSESSMENT PROCESS

- A documented process to assess risk consistently and reasonably accurately
- Needs adequate guidelines on completing an assessment
- Should identify which methodology will be used and when

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Potential Harm based on MW lost	> 5k MW	Serious	Moderate	High	High	Extreme	Extreme
	2.5k to 5k MW	High	Moderate	Moderate	High	High	Extreme
	1k to 2.5k MW	Moderate	Minimal	Moderate	Moderate	High	High
	300 to 1,000 MW	Minimal	Minimal	Minimal	Moderate	Moderate	High
	< 300 MW	Negligible	Negligible	Negligible	Minimal	Moderate	Moderate
			Remote	Unlikely	Possible	Likely	Certain
			> 1 in 10,000	1 in 1000	1 in 100	1 in 20	1 in 5
Likelihood of occurrence based on odds							S

Quantitative



ASSESSING POTENTIAL HARM

Assessing the adverse impacts as they relate to potential non-compliance normally begins with the assets directly involved.



➤ However, the assessments must consider interconnected or interrelated systems.



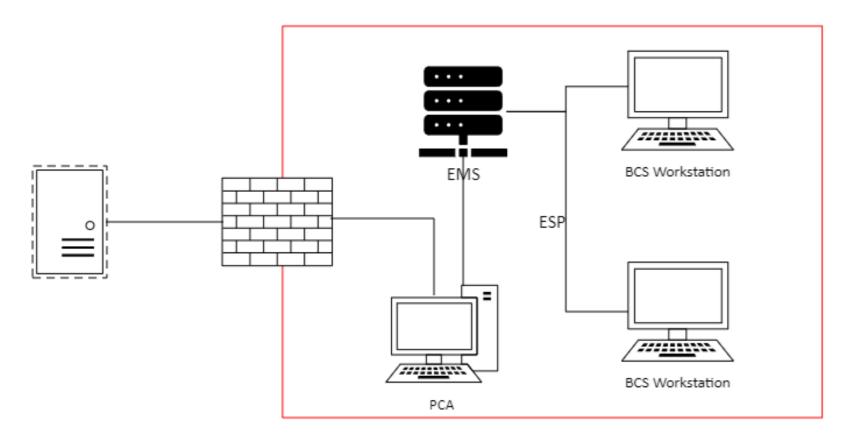
Likewise, they may also need to include potential adverse impacts on neighboring systems.

NERC has set a minimum list of factors to consider.

- Referenced in the Risk Assessment Guidelines document on the RF site
- Found in Chapter 2, Registered Entity Self-Report and Mitigation Plan (Jan 2021)

FIRST POTENTIAL HARM PITFALL

Many entities fail to appropriately scope the potential harm





SECOND COMMON PITFALL

- Entities often consider facts such as:
 - Software security tools
 - Internal controls
 - Infrequency of an adverse event

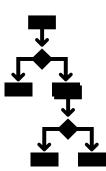


- These reduce the likelihood of occurrence, not the potential harm
- A system will still catastrophically fail if those mitigating factors are all circumvented

ASSESSING LIKELIHOOD OF OCCURRENCE

- Practical application of estimation
- Two common techniques include:
 - Percentages and odds
- SMEs must consider
 - Vulnerabilities

- Threats that can leverage the vulnerabilities
- The likelihood that a threat may compromise the vulnerability
- Biases can play a huge role

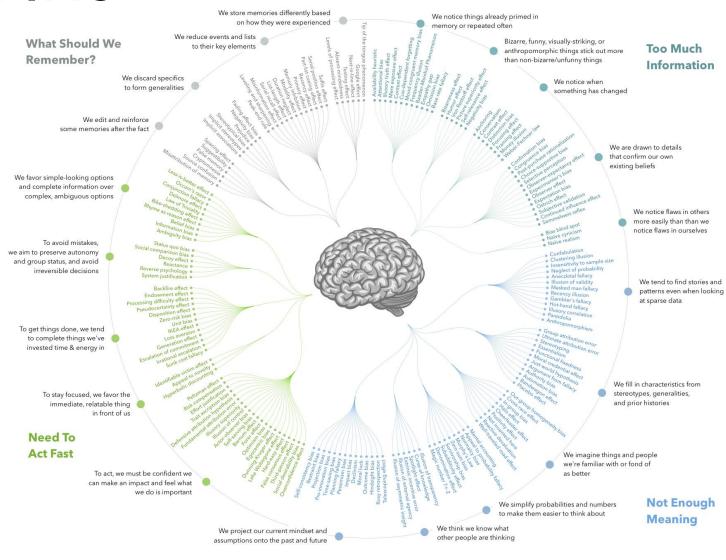


MANAGING BIAS

COGNITIVE BIAS CODEX

Common biases

- Overconfidence
- Confirmation
- Anchoring
- Observer expectancy
- Suggestibility



DESIGNHACKS.CO · CATEGORIZATION BY BUSTER BENSON · ALGORITHMIC DESIGN BY JOHN MANOOGIAN III (JM3) · DATA BY WIKIPEDIA



REDUCING & AGGRAVATING FACTORS

- Here is where the second common pitfall of harm assessment can apply
 - What software tools (log analytic tools) installed
 - What Internal controls (baseline monitoring) are in place
 - Are there active attacks in the wild
- Aggravating factors to consider
 - Overlapping issues with other security controls
 - Interdependent systems



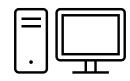
CONSIDERING MITIGATION

- Mitigation steps can be implemented during the assessment or afterward
- Mitigation steps are actions that fix or remediate the issue
- They also include actions to reduce occurrence of an issue by preventing, detecting, or correcting future issues (Internal Controls)









FIVE ALIGN MITIGATION ACTIONS:

Remediating Action: An action taken to return to compliance



• **Preventive Control Action:** Creation of an internal control designed to avoid an unintended event or consequence.



• **Detective Control Action:** Creation of an internal control designed to identify errors or deviations from the norm.



Corrective Control Action: Creation of an internal control designed to fix a problem that may arise.



Other...

INTERNAL CONTROLS

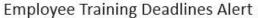
- Can be technical, procedural, or a combination of the two
- Technical controls are automated systems that work without human initiation
- Procedural controls are policies, procedures and checklists
- Some technical controls rely on a procedural controls



PRACTICAL EXAMPLE

Consider a scenario where an employee's CIP training date is entered into an electronic record, specifically a data entry field.

In this scenario the entity could establish at least two procedural and two technical internal controls



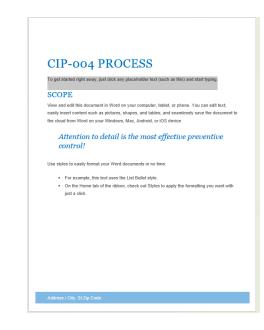




This is an automated alert. The following employee last training date completion was over 12 months

John Doe: Operations, john.doe@entity.com, op.mgr@entity.com Jane Wonde: IT Security, jane.wonde@entity.com, itsec.mgr@entity.com Sean Bea: DASales, sean.bea@entity.com, dasales.mgr@entity.com

Please review the CIP-004 Process document for next steps to initiate the next training cycle.



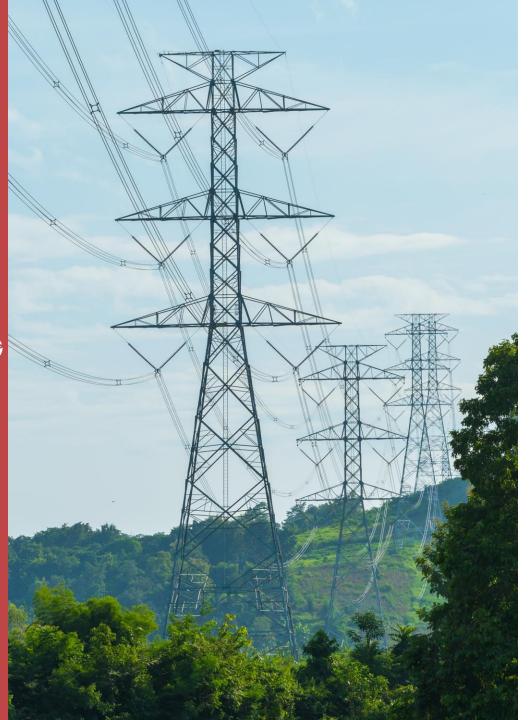


CIP-004 DATA ENTRY **CHECKLIST**

- Do this first
- Do this second
- o Check the data
- Open the application
- Enter the data
- Confirm the data is entered correctly
- Save the information

SOURCES

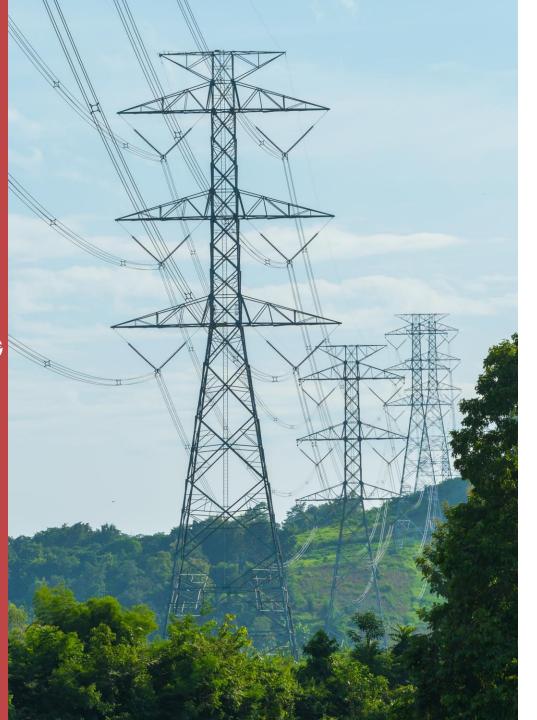
- RF Risk Assessment Guideline
- NERC Rules of Procedure, Appendix 4C, effective 5/19/22
- NERC Self-Logging Program User Guide, Chapter 2, dated 11/27/2018
- NERC Registered Entity Self-Report and Mitigation Plan, Chapter 2, dated
 January 2021
- NIST Special Publication 800-30, Revision 1, Guide for Conducting Risk Assessments, Appendix G
- Cognitive Bias Codex



QUESTIONS & ANSWERS

Shawn Barrett

shawn.barrett@rfirst.org



THANK YOU

Join us for our next Tech Talk - October 28th

Webinar Link

Fall Reliability Summit - September 16th - 18th