**1. RECOMMENDED ACTION: EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:**

|  |  |  |  |
| --- | --- | --- | --- |
|  | Accept as requested | X | Change to Existing Practice |
| X | Accept as modified below |  | Status Quo |
|  | Decline |  |  |

**2. TYPE OF DEVELOPMENT/MAINTENANCE**

|  |  |
| --- | --- |
| **Per Request:** | **Per Recommendation:** |
|  | Initiation |  | Initiation |
| x | Modification |  X | Modification |
|  | Interpretation |  | Interpretation |
|  | Withdrawal |  | Withdrawal |
|  |  |  |  |
|  | Principle |  | Principle |
|  | Definition |  | Definition |
| X | Business Practice Standard |  | Business Practice Standard |
| X | Document | X | Document |
|  | Data Element |  | Data Element |
|  | Code Value |  | Code Value |
|  | X12 Implementation Guide |  | X12 Implementation Guide |
|  | Business Process Documentation |  | Business Process Documentation |

**3. RECOMMENDATION**

**SUMMARY:**

Review annually at a minimum, WEQ-012 and the accreditation requirements for Authorized Certification Authorities to determine if any changes are needed to meet market conditions

Evaluate and modify standards as needed to support and/or complement the current version of the NERC Critical Infrastructure Protection Standards and any other activities of NERC and the FERC related to cybersecurity.

**Recommended Standards:**

Proposed modifications to the NAESB Accreditation Requirements for Authorized Certification Authorities: <https://www.naesb.org/member_login_check.asp?doc=weq_2021_api_4a-b_rec_attach.docx>

**4. SUPPORTING DOCUMENTATION**

**a. Description of Request:**

2020 WEQ Annual Plan Item 4.a – Review annually at a minimum, WEQ-012 and the accreditation requirements for Authorized Certification Authorities to determine if any changes are needed to meet market conditions.

2020 WEQ Annual Plan Item 4.b – Evaluate and modify standards as needed to support and/or complement the current version of the NERC Critical Infrastructure Protection Standards and any other activities of NERC and the FERC related to cybersecurity.

**b. Description of Recommendation:**

The proposed revisions modify Section 2.2.4 Validation of Organization Name of the NAESB Accreditation Requirements for Authorized Certification Authorities to require that code signing certificates issued by NAESB ACAs include the organization name in the organization field of the certificate and include mapping to supporting guidelines that ACAs issuing code signing must follow.

In developing this recommendation, the WEQ Cybersecurity Subcommittee reviewed and discussed the May 12, 2021 Executive Order on Improving the Nation’s Cybersecurity, the NERC CIP Reliability Standards approved by FERC via letter order on March 18, 2021 (CIP-005-7, CIP-010-4, and CIP-013-2), the NERC Projects that could result in potential revisions to the NERC CIP Reliability Standards, the FERC Potential Enhancements to the Critical Infrastructure Protection Reliability Standards Notice of Inquiry (issued on June 18, 2020 in Docket No. RM20-12-000), and the FERC Equipment and Services Produced or Provided by Certain Entities Identified as Risks to National Security Notice of Inquiry (issued on September 17, 2020 in Docket No. RM20-19-000). The subcommittee will continue to monitor for any future modifications or additions to the standards or NAESB Accreditation Requirements for Authorized Certification Authorities that may be necessary to support the above mentioned Executive Order, FERC Notice of Inquiries, or the NERC Reliability Standards under development as part of NERC Project 2016-02 Modifications to CIP Standards, NERC Project 2019-02 BES Cyber System Information Access Management, NERC Project 2020-03 Supply Chain Low Impact Revisions, NERC Project 2020-04 Modifications to CIP-012, and NERC Project 2021-03 CIP-002 Transmission Owner Control Centers.

**c. Business Purpose:**

As identified by the WEQ Cybersecurity Subcommittee participants, there is a growing reliance on code signing to verify software and other executables within the energy industry, and the NERC CIP-010 Cyber Security – Configuration Change Management and Vulnerability Assessments require verification of the identity of the software source. The revisions to the NAESB Accreditation Requirements for Authorized Certification Authorities will support industry use of code signing certificates by ensuring that any NAESB ACA issuing usable certificates that identify the organization name and that the issuing NAESB ACA is following best practices for code signing certificates.

**d. Commentary/Rationale of Subcommittee(s)/Task Force(s):**

Reference Meeting Minutes:

* [May 4, 2021](https://naesb.org/pdf4/weq_css050421fm.doc)
* [May 25, 2021](https://naesb.org/pdf4/weq_css052521fm.doc)
* [June 15, 2021](https://www.naesb.org/pdf4/weq_css061521fm.doc)
* July 13, 2021