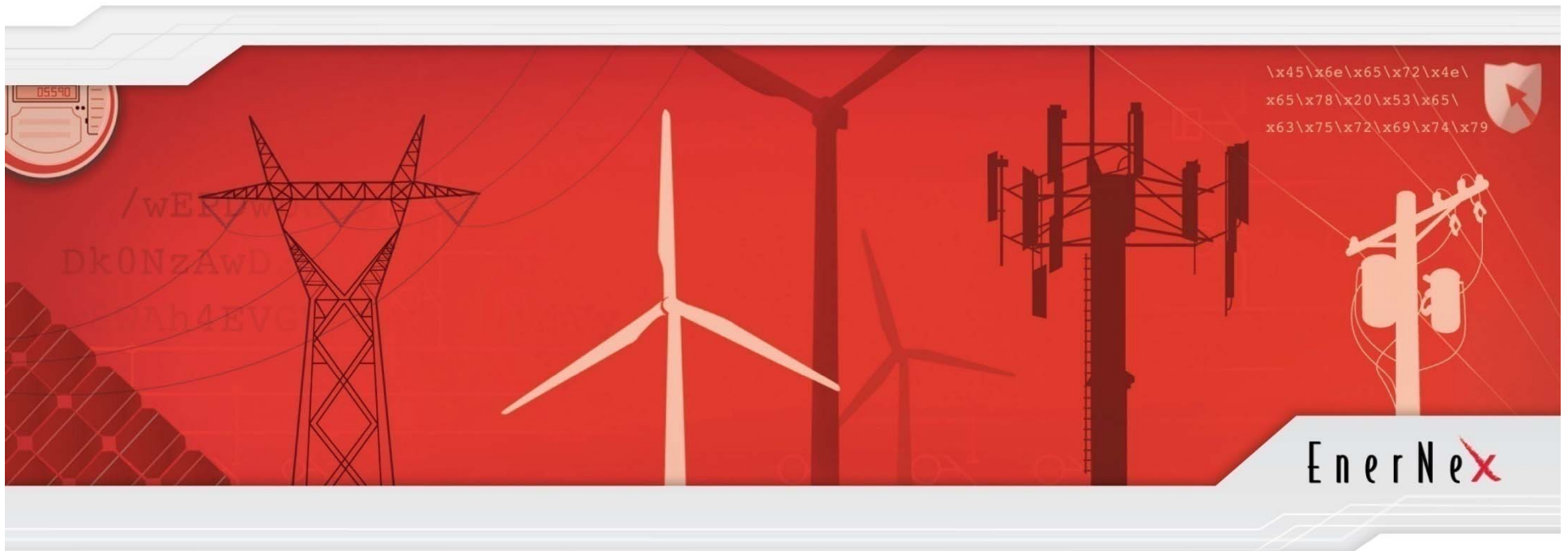


# Compliance, audit, risk, security – what's the difference and why do we need it?

Presented By:  
Sandy Bacik, Principal Consultant





# Agenda

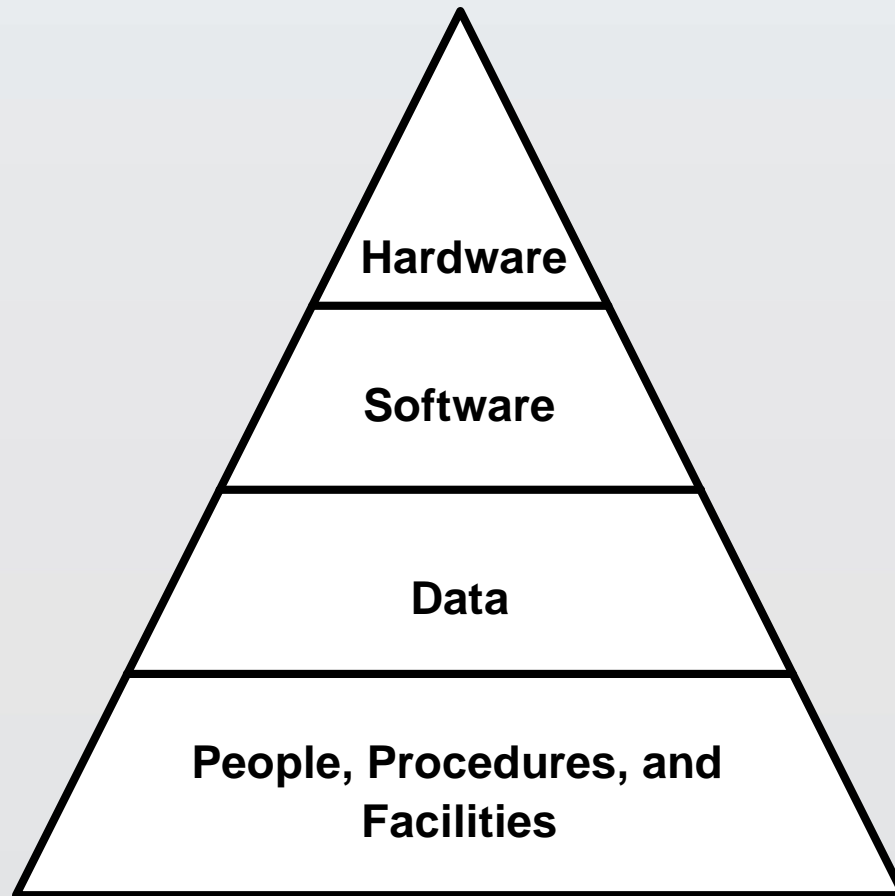
- ▶ Defining compliance, audit, risk, and security
- ▶ What is the difference between them?
- ▶ Why do I need all four functions?
- ▶ Can I build one program that includes all these functions?

The header banner features a grayscale background with various industrial and energy-related icons. On the left, there is a circular gauge with a needle and a digital display showing '05540'. Next to it is a high-voltage electrical transmission tower. In the center, a wind turbine is visible. To the right, there are diagrams of electrical switchgear and a power line with a transformer. In the top right corner, there is a small shield icon and some red text that appears to be a file path or code: \x45\x6e\x65\x72\x4e\x65\x78\x20\x53\x65\x63\x75\x72\x69\x74\x79.

# Protecting Assets

- ▶ Consists of protection methods from liabilities (enterprise obligations)
  - Information
  - Contracts
  - Personnel
  - Systems
  - Communications

# Risk Triangle



Hardware and software is replaceable, it is not customized

Data risk is larger, because it takes much to recreate it should something happen

People are sometimes a wildcard when dealing with assets

The header banner features a collage of industrial and utility-related icons. On the left, there is a red circular gauge with a needle and a digital display showing '05540'. Next to it is a white electrical pylon. In the center, a white wind turbine is visible. To the right, there are white silhouettes of industrial structures, possibly distillation columns or storage tanks. Further right, there is a white electrical substation with multiple insulators and a transformer. In the top right corner, there is a small shield icon with a checkmark inside. Above the shield, there is a block of red text that appears to be a hex dump or a series of escaped characters: \x45\x6e\x65\x72\x4e\x65\x78\x20\x53\x65\x63\x75\x72\x69\x74\x79.

# Change Is a Constant

- ▶ Threats
- ▶ Risks
- ▶ Privacy and invasive technology
- ▶ Legislation
  
- ▶ All related to a degradation of trust
  - Trust Degrades over time
  - Trust provides value to information
  - Multi-faceted – experience, referral, observation, communicative

The header banner features a grayscale background with various industrial and energy-related illustrations. On the left, there is a circular meter or gauge with a red needle. In the center, a high-voltage electrical transmission tower stands prominently. To the right of the tower, there are faint outlines of wind turbines and other power infrastructure. In the top right corner, there is a small shield icon and some red text that appears to be a file path or code: \x45\x6e\x65\x72\x4e\x65\x78\x20\x53\x65\x63\x75\x72\x69\x74\x79.

# What is due diligence?

Such a measure of prudence, activity, or assiduity, as properly exercised by a reasonable and prudent man under the particular circumstances; not measured by any absolute standard, but depending on the relative facts of the case.

The header banner features a collage of energy-related icons: a digital meter on the left, a high-voltage power line tower, two wind turbines, a complex electrical substation, and a power pole with transformers on the right. The word "Governance" is prominently displayed in a large, bold, black font across the middle of the banner.

# Governance

- ▶ Governance relates to decisions that define expectations, grant power, or verify performance.
- ▶ It consists either of a separate process or of a specific part of management or leadership processes.
- ▶ The structure, oversight and management processes which ensure the delivery of the expected benefits of technology in a controlled way to help enhance the long term sustainable success of the enterprise.

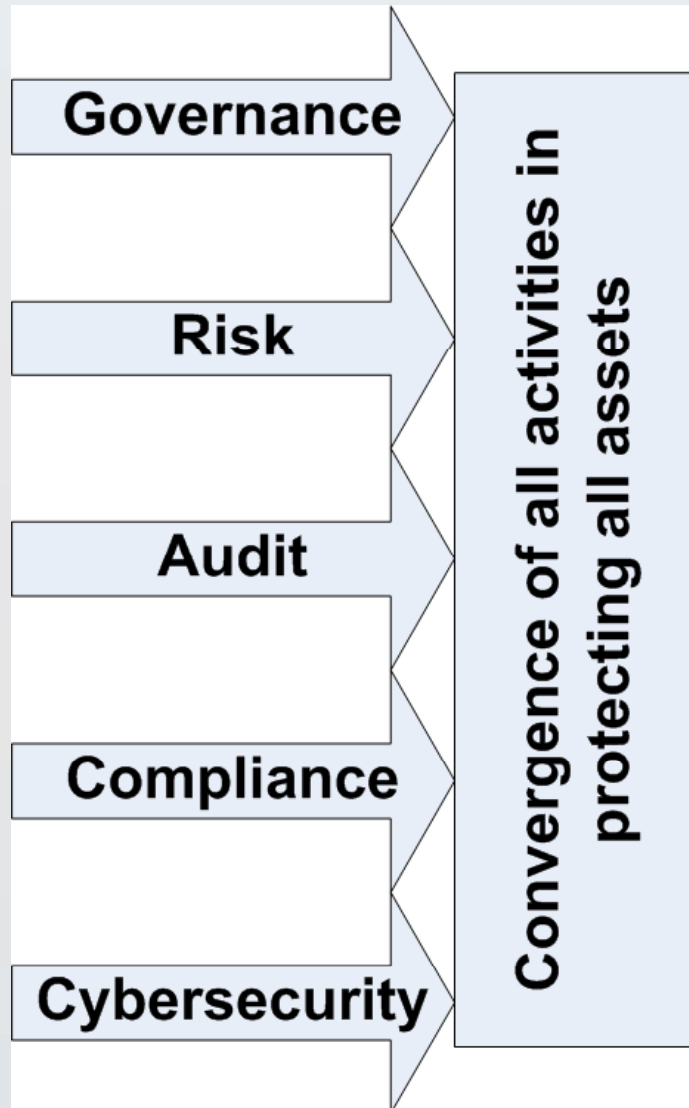
The header banner features a grayscale background with various industrial and energy-related icons. On the left, there is a circular gauge with a needle and the number '05540'. In the center, there are silhouettes of high-voltage power transmission towers and wind turbines. On the right, there are smaller icons of industrial buildings and a shield with a checkmark. A small block of red text is visible in the top right corner of the banner.

# Enterprise Governance Architecture

- ▶ A business organization's risk reduction style and methodology
- ▶ A business organization's compliance and audit methodology
- ▶ Designed to protect the assets of an organization, where assets are defined as resources that provide value to the organization
- ▶ Program that facilitates systematic business change by continually aligning security and technology investments and projects with business mission needs



# Convergence



Think about all areas, including the business processes, when developing asset protection.

Saves time in the future.



# Risk

- ▶ Risk management is the identification, assessment, and prioritization of risks (defined in ISO 31000 as the effect of uncertainty on objectives, whether positive or negative) followed by coordinated and economical application of resources to minimize, monitor, and control the probability and/or impact of unfortunate events or to maximize the realization of opportunities
- ▶ Risks can come from uncertainty in project failures (at any phase in design, development, production, or sustainment life-cycles), legal liabilities, credit risk, accidents, natural causes and disasters as well as deliberate attack from an adversary, or events of uncertain or unpredictable root-cause

# Risk

- ▶ Risk management standards
  - ISO/IEC Guide 73:2009 (2009)
  - ISO/DIS 31000 (2009)
  - NIST SP800-30





# Audit

- ▶ Internally and externally supported
- ▶ An evaluation of a person, organization, system, process, enterprise, project or product
- ▶ Audits are performed to ascertain the validity and reliability of information; also to provide an assessment of a system's internal control. The goal of an audit is to express an opinion of the person / organization / system (etc.) in question, under evaluation based on work done on a test basis.
- ▶ Very similar to a basic checklist



# Compliance

- ▶ Internally and externally supported
- ▶ Conforming to a rule, such as a specification, policy, standard or law
- ▶ Regulatory compliance describes the goal that the utility aspires to in their efforts to ensure that personnel are aware of and take steps to comply with relevant laws and regulations
- ▶ Due to the increasing number of regulations and need for operational transparency, organizations are increasingly adopting the use of consolidated and harmonized sets of compliance controls. (This approach is used to ensure that all necessary governance requirements can be met without the unnecessary duplication of effort and activity from resources.)
- ▶ Very similar to a basic checklist

The header banner features a collage of industrial and cybersecurity-related images. On the left, there's a circular gauge with a red needle. In the center, a high-voltage electrical transmission tower stands prominently. To its right, a wind turbine is visible. Further right, there are schematic diagrams of electrical circuits and power lines. On the far right, a shield icon with a checkmark is present, and some hexadecimal code is displayed in red text.

# Cybersecurity

- ▶ Internally and externally supported
- ▶ A measure of system's ability to resist unauthorized attempts at usage or behavior modification, while still providing service to legitimate users.
- ▶ The protection of data and systems
- ▶ Actions required to ensure freedom from danger and risk to the security of information in all its forms (electronic, physical), and the security of the systems and networks where information is stored, accessed, processed, and transmitted (DoD)

# All Comes Down To Asset Protection



The header banner features a grayscale background with various industrial and energy-related icons. On the left, there is a circular meter with a red needle and the number '05540'. Next to it is a high-voltage electrical transmission tower. In the center, a wind turbine is visible. To the right, there are industrial storage tanks and a power line with a transformer. In the top right corner, there is a small shield icon and some red text that appears to be a file path or code: \x45\x6e\x65\x72\x4e\x65\x78\x20\x53\x65\x63\x75\x72\x69\x74\x79.

# How do we govern assets?

- ▶ Administrative and managerial measures
- ▶ Physical
- ▶ Technical measures





# How We Start (1)

- ▶ Identifying
  - Assets
  - Communications
  - Architecture
  - Industry policy, requirements, regulations
- ▶ Perform a risk assessment
  - Evaluating on the acceptable level of risk



# How We Start (2)

## ► Compliance / Audit

- Controls
- Monitoring
- Ensure we meet the controls

## ► Cybersecurity

- Controls
- Monitoring
- Testing – penetration, vulnerability, assessments – how well we meeting the controls



# Governance

- ▶ The protection of assets needs to have
  - Risk
  - Audit
  - Compliance and
  - Cybersecurity
- ▶ In-sourced and outsourced



# 5Ws and 1H

- ▶ “I keep six honest serving-men  
(They taught me all I knew);  
Their names are What and Why  
and When and How and Where  
and Who.” – Rudyard Kipling
- ▶ For example
  - What - Value
  - What - Goal
  - How - Function
  - Degree - Metric
  - Where - Context
  - When - Time
  - Who - Responsible
- ▶ Value – What kind of a structure
- ▶ Goal – What is the goal
- ▶ Function – What does it do / have
- ▶ Metric – What does success mean
- ▶ Context – Where will the structure be
- ▶ Time – What is the urgency
- ▶ Responsibility – Who shall build / who shall benefit

# Assessing Example (1)

## ► Requirement:

- The SG system uniquely identifies and authenticates users (or processes acting on behalf of users). The SG system uses multifactor authentication for remote access to non-privileged accounts; local access to privileged accounts; and remote access to privileged accounts.

# Assessing Example (2)

- ▶ The SG system uniquely identifies and authenticates users (or processes acting on behalf of users). The SG system uses multifactor authentication for remote access to non-privileged accounts; local access to privileged accounts; and remote access to privileged accounts.

## ▶ Risk

- What SG systems require unique identification?
- What information is processed on the SG system?
- What risk does not having unique identification present?
- As we willing to accept the risk?

# Assessing Example (3)

- ▶ The SG system uniquely identifies and authenticates users (or processes acting on behalf of users). The SG system uses multifactor authentication for remote access to non-privileged accounts; local access to privileged accounts; and remote access to privileged accounts.

## ▶ Audit

- List the ID on a SG system and determine if all the IDs unique and not shared?
- What about remote access IDs?
- What are the privileged accounts and are they unique and not shared
- Show configuration file on access

# Assessing Example (4)

- ▶ The SG system uniquely identifies and authenticates users (or processes acting on behalf of users). The SG system uses multifactor authentication for remote access to non-privileged accounts; local access to privileged accounts; and remote access to privileged accounts.

## ▶ Compliance

- How does the system conform to the requirement?
- Show configuration file(s)
- List the IDs and show separation of duties and look at ID descriptions



# Assessing Example (5)

- ▶ The SG system uniquely identifies and authenticates users (or processes acting on behalf of users). The SG system uses multifactor authentication for remote access to non-privileged accounts; local access to privileged accounts; and remote access to privileged accounts.

## ▶ Cybersecurity

- Identify a SG system
- Select a non-privileged id, privileged id, remote access id, local id
- Attempt to use the IDs for proper and unauthorized use



# Simplification

- ▶ What processes cross multiple assessments
- ▶ Reporting into the same part of the organization (separation from operational functions)
- ▶ Splitting assessments between in-sourced and outsourced engagements
- ▶ Keep current evidence of assessments
- ▶ Determine what best fit into the culture



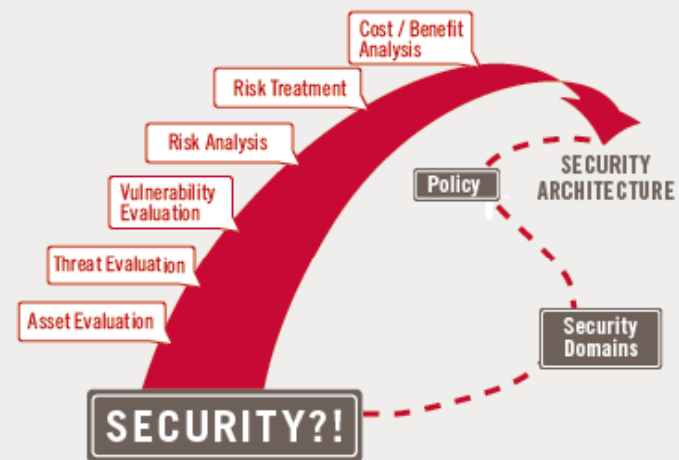
# Summary

- ▶ Discussed the merging of the risk, audit, compliance, security, and governance concepts
  - To get a complete picture of asset protection the organization needs all the pieces
- ▶ How to simplify the processes
- ▶ Why a utility needs risk, audit, compliance, security, and governance programs implemented

# EnerNex Cyber Security Offerings

- ▶ Security Architecture and Policy Development
- ▶ Utility Automation Security
- ▶ NERC-CIP
- ▶ Hardware Embedded Security
- ▶ Security & Penetration Testing
- ▶ Vulnerability Analysis
- ▶ Risk Assessments
- ▶ Security Audit Development
- ▶ Regulatory Compliance
- ▶ Security Training

## STRATEGY Risk Management




- ▶ *Clients:* Consumers Energy, U.S Department of Energy, Duke Energy, Florida Power & Light (FPL), Southern California Edison (SCE), Tennessee Valley Authority (TVA), TXU Energy


# Thank you for attending

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