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Cybersecurity Framework Profile for Liquefied Natural Gas

William Newhouse
Josephine Long
David Weitzel
Jason Warren
Michael Thompson
Chris Yates
Hillary Tran
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William Newhouse
Applied Cybersecurity Division / National
Cybersecurity Center of Excellence
Information Technology Laboratory

Josephine Long
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Hillary Tran
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Tom Cottle
The MITRE Corporation

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U.S. Department of Commerce *Gina M. Raimondo, Secretary*

National Institute of Standards and Technology Laurie E. Locascio, NIST Director and Under Secretary of Commerce for Standards and Technology

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Author ORCID iDs

William Newhouse: 0000-0002-4873-7648

Contact Information

LNG-CSF-Profile-NCCoE@nist.gov

National Institute of Standards and Technology

Attn: National Cybersecurity Center of Excellence, Applied Cybersecurity Division, Information Technology Laboratory

100 Bureau Drive (Mail Stop 2002) Gaithersburg, MD 20899-2002

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Abstract

This document is the Cybersecurity Framework Profile developed for the Liquefied Natural Gas (LNG) industry and the subsidiary functions that support the overarching liquefaction process, transport, and distribution of LNG. The LNG Cybersecurity Framework Profile can be used by liquefaction facilities, LNG vessels, and other supporting entities of the LNG lifecycle so that cybersecurity risks associated with these critical processes and systems can be minimized. The LNG Profile provides a voluntary, risk-based approach for managing cybersecurity activities and reducing cyber risk to the overall LNG process. The Cybersecurity Framework LNG Profile is meant to supplement but not replace current cybersecurity standards, regulations, and industry guidelines that are already being used by the Liquefied Natural Gas industry.

Keywords

Cybersecurity Framework; CSF; CSF Profile; liquefaction; liquefied natural gas; LNG; Marine Transportation System; MTS; mission objectives; risk management; security controls.

Reports on Computer Systems Technology

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Marco Ayala Ana Girdner Chad Collins
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Richard Slaugh Todd Beebe Khaled El Najjar

Kinder Morgan Freeport LNG Cheniere

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David Bock Rene Philibert Orlando Alvarado

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1. Introduction

The NIST Cybersecurity Framework (CSF) [1] is a voluntary, risk-based assemblage of industry standards and best practices designed to help organizations manage and reduce cybersecurity risks. The CSF, created through a collaborative public process, uses a common language to address and manage cybersecurity risk in a cost-effective way based on business needs without imposing additional regulatory requirements. Although the CSF presents a variety of mitigations, many sectors and industries have opted to create their own prioritizations, known as CSF Profiles ("Profile"). This document is one such Profile, an application of the CSF to the Liquefied Natural Gas (LNG) industry.

The importance of natural gas as an energy source has grown steadily for the last 40 years. Natural gas currently makes up 25% of annual global energy consumption—up from 18% in 1980 [2]. The United States supplies 24% of the annual natural gas produced globally—more than any other country [3]. In the United States, the primary method for transporting natural gas from production facilities to consumers is through a network of approximately 3 million miles of interstate and local pipelines [4]. Additionally, natural gas is transported in its liquefied form—LNG—both domestically and internationally across regions where pipelines are not feasible (e.g., unstable terrain, large bodies of water). As international usage of natural gas continues to increase, exports of LNG have become increasingly important in the international market [5]. The international market for LNG relies on safe handling of this energy resource within the U.S. Marine Transportation System (MTS).

1.1. Purpose and Scope

This profile was developed to take a broad look at the LNG industry's infrastructure and to engage with LNG industry stakeholders to identify their mission objectives and priorities. With any risk management process or when making cybersecurity decisions, an organization must consider its own specific needs.

This profile demonstrates one aspect of how cybersecurity activities can be prioritized based on LNG-specific mission objectives.

This profile can be used in several ways, including the following:

- To highlight high priority security expectations,
- To perform a self-assessment comparison of current risk management practices, or
- As a baseline profile or example profile to reference when developing one's own.

To help jurisdictions across the United States safeguard LNG, this Profile is written around high-level, mission-oriented goals ("mission objectives") of LNG infrastructure as identified by industry stakeholders who were listed as contributors on the previous page. These mission objectives, described in Sec. 5, do not directly address every technical aspect of the LNG process. Specifically, technical components of LNG systems necessary for accomplishing those goals vary widely across the United States and cannot be captured in their entirety within a single Profile. This Profile will help the LNG sector focus on the functions that require attention and allow sector stakeholders to implement specific controls that are most suitable for their set of circumstances.

This Profile can help organizations identify opportunities for managing cybersecurity risks in the LNG lifecycle. Section 5 of this document provides a baseline of the mission objectives for LNG operations that were identified and prioritized by LNG industry stakeholders. Section 6 builds on the identified mission objectives to develop a prioritized list of CSF Categories. Section 7 of this document includes a table of prioritized CSF Subcategories based on identified CSF Categories. These prioritizations of mission objectives, CSF Categories, and CSF Subcategories may serve as a useful starting point to identify cybersecurity activities and outcomes that may be important to members of the LNG industry. Additionally, prioritizations can be tailored to account for specific mission objectives or operational considerations. A similar method to that described in Sec. 4 can be applied to tailor this Profile for an individual organization.

Organizations across the energy sector place a high priority on mitigating risks to operational technologies (OT)—the systems used to monitor and control physical processes. These systems manage critical energy sector processes that, if damaged or disrupted, could impact energy delivery, public safety, and national security. This Profile focuses on managing risks to OT systems in LNG operations, including onboard monitoring and control technologies and remotely managed, third-party systems. In addition to the recommendations for LNG organizations offered in this Profile, additional high-level OTspecific issues should be considered when reviewing this Profile and the CSF. OT environments typically encompass expansive and diverse assets that may not be controllable through conventional information technology (IT)-based cybersecurity tools, techniques, and methods due to the design and architecture of some OT assets. These assets also have a high potential for operational disruption when cybersecurity monitoring or scanning tools are applied to OT environments. Implementing separate-but-connected IT and OT networks is an effective way to mitigate various risks, including the impact that tools designed for IT networks may have on OT assets. Organizations may also face additional supply chain-related challenges as many field assets are vendor-supplied and operational needs may drive acquisition decisions. Procurement and change management processes that engage engineering and IT stakeholders can help to mitigate some of this risk. Given that OT assets drive core business processes for LNG organizations, additional consideration can be given to these issues when applying the guidance in this Profile.

This document is not intended to replace any existing cybersecurity guidance or policy, but rather to complement existing best practices by helping stakeholders prioritize the recommendations provided by LNG organizations such as Shell, ExxonMobil, Kinder Morgan, Golden Pass, and Cheniere. Organizations face unique risks and, therefore, a sector-wide Profile does not guarantee protection from all cyber threats. The decision on how to implement the Profile should be based on an organization's risk tolerance, environment, and operational needs.

1.2. Audience

This document is intended for those within the LNG industry who seek a greater understanding of cybersecurity risks to the Liquefied Natural Gas industry.

This document can also serve as a guide to those who need to create a Profile for their own organization.

LNG processes are complex and varied, so some knowledge of the Marine Transportation System (MTS) and the liquefaction process will be helpful to readers. An understanding of cybersecurity concepts will also be useful for those managing, implementing, and maintaining LNG systems impacted by this Profile.

1.3. Document Structure

This document consists of the following sections:

- <u>Section 2</u> provides an overview of the LNG industry.
- <u>Section 3</u> discusses key aspects of the CSF and CSF Profiles.
- Section 4 describes the methodology used to develop this Profile.
- Section 5 presents the high-level mission objectives that support the LNG industry.
- <u>Section 6</u> summarizes CSF Categories prioritized for the LNG industry.
- Section 7 details the relative importance of CSF Subcategories to the LNG industry.
- References section contains a list of all items cited in this document.
- Appendix A defines acronyms used in this document.
- Appendix B provides a glossary of key terms used in this document.

2. The Liquefied Natural Gas Industry

This publication was prepared for the U.S. Department of Energy's CESER as part of an inter-agency agreement with NIST's National Cybersecurity Center of Excellence (NCCoE) to research and develop tools and practices that will strengthen the cybersecurity of the systems that handle energy resources within our nation's MTS. This Profile is focused on the LNG energy resource. CESER and NIST's NCCOE developed this Profile through a collaborative process, driven by LNG asset owners and operators.

2.1. Liquefied Natural Gas

Natural gas in its liquid state is about 600 times smaller in volume than its gaseous state. Liquefying natural gas allows the natural gas industry to convey its energy resource long distances to markets not supported by pipelines. For shipping and storage, LNG must be kept at about -260° Fahrenheit to remain in a liquid state [5]. The LNG industry is made up of components established to enable the shipping of natural gas as LNG.

2.2. Components of the Liquefied Natural Gas Industry

Components of the Liquefied Natural Gas industry are very complex, are often automated, and require considerable effort and coordination when an organization seeks alignment of standards, guidelines, and practices to identify opportunities for improving their cybersecurity posture.

Figure 1 shows the components of the Liquefied Natural Gas industry supply chain main components. The remainder of this section will focus on the following components of that supply chain:

- Liquefaction Facilities
- LNG Vessels and the Marine Transportation System (MTS)
- LNG Terminals

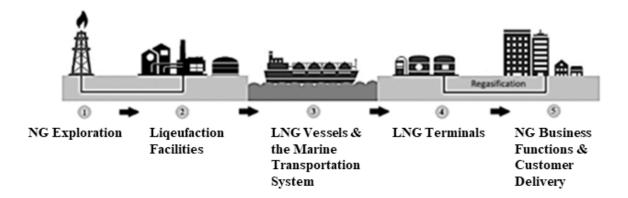


Fig. 1. Liquefied Natural Gas Industry Supply Chain Main Components

2.2.1. Liquefaction Facilities

During the exploration phase, natural gas is extracted from reservoirs and transported via pipeline to an LNG liquefaction facility. LNG liquefaction facilities convert natural gas into LNG, store processed LNG, and supply LNG to transport vessels.

2.2.1.1. Critical Systems Found in LNG Liquefaction Facilities

Gas Pre-Treatment (Pre-Liquefaction)

Prior to liquefaction, it is essential to begin the process with a pre-treatment. The gas pre-treatment removes impurities, such as any non-methane chemicals, from the natural gas stream. This pre-treatment prepares the gas for liquefaction and reduces the chance of hydrates forming, which will hinder the performance of operations.

Liquefaction

The liquefaction process is what turns the natural gas into liquefied natural gas. Following the pre-treatment, the gas is cooled until it reaches the temperature at which it turns from a liquid to a gas. This may be accomplished through several processes, but typically involves the use of a heat exchanger that allows the heat energy in the natural gas to be absorbed by pre-cooled refrigerant liquids. The natural gas is cooled to approximately -260° Fahrenheit—the temperature at which natural gas will change from a gas to a liquid [6].

Liquefied Natural Gas Storage

LNG is stored in highly insulated tanks to help maintain the low temperatures required to keep it in a liquid state. Even though the storage tanks are well insulated, some heat from the surrounding environment will still be absorbed by the tanks and transferred to the LNG stored inside. This causes a small amount of the LNG to change back into a gas and rise to the top of the tank. The change from a liquid to a gas absorbs heat energy helping to keep the rest of the liquid cool. As natural gas builds up at the top of the storage tank it is reclaimed by a boil-off gas (BOG) system and used or sold by the liquefaction facility [7].

Operational Technology (OT) Supporting Critical Systems

Pre-treatment, liquefaction, and storage processes are monitored and controlled with the aid of operational technology (OT). OT also supports process safety systems that are used to protect equipment and avoid potential hazards to the environment or human safety. Examples of operational technology in use within process and safety systems include embedded systems, relays, programmable logic controllers (PLCs), and human machine interfaces (HMIs).

2.2.2. Liquefied Natural Gas Vessels and the Marine Transportation System

According to the U.S. Committee on the Marine Transportation System, the MTS comprises 25,000 miles of navigable channels, 239 locks, and more than 3,700 marine terminals [8]. The system includes waterways, ports, and intermodal landside connections that coordinate with 174,000 miles of railways, facilitating the movement of people and goods to and from the water [9]. Freight transport by sea has been widely utilized in the MTS.

LNG vessels are specialized tank ships that must meet high international and U.S. Coast Guard standards. These are high-tech vessels that use special materials and designs to safely handle very cold LNG. The enterprise resource planning system and an integrated automation system manage OT systems on an LNG tank ship. These systems incorporate human-machine interfaces that monitor process data and can access trend data or messages. Decision support tools, such as bridge systems and navigation systems, contribute to the safety and reliability of shipping operations.

2.2.3. Liquefied Natural Gas LNG Export and Import Terminals

An LNG export terminal is a facility that receives natural gas from transmission pipelines. In this facility natural gas is liquefied, stored, and transferred to ships for export. An LNG import terminal receives LNG from ships, stores it, and reverses the liquefication process, turning LNG back into its gaseous form. The natural gas can then be distributed via pipelines to customers. In the United States, LNG export and import terminals can be deepwater port terminals (located outside State waters) or located on the coastline or within State waters [10].

2.3. Liquefied Natural Gas Safety

More than 33,000 shipments have transported over three billion cubic meters of LNG over the past 40 years without serious accidents at sea or in port. Hazardous situations are identified through natural gas, fire, and smoke detection systems that can automatically halt operations [11].

In the United States, the U.S. Coast Guard is responsible for regulating the security controls in place to protect the terminal and the vessels accessing the terminal [11][12]. The Department of Transportation Pipeline and Hazardous Materials Safety Administration and Federal Energy Regulatory Commission also share security oversight with the Coast Guard and other agencies on issues of marine safety and security at LNG import and export facilities [13].

3. Overview of the Cybersecurity Framework

The CSF uses business drivers to guide cybersecurity activities within an organization. The CSF enables organizations—regardless of size, degree of cybersecurity risk, or cybersecurity sophistication—to apply the principles and best practices of risk management to improving security and resilience. It provides a common language for understanding, managing, and expressing cybersecurity risk and cybersecurity management communications among internal and external stakeholders and across an organization, regardless of cybersecurity expertise. For organizations that require a starting point for leveraging the CSF, NIST's Getting Started with the NIST Cybersecurity Framework: A Quick Start Guide provides an overview and explanation for each of the CSF Functions [14].

The CSF consists of three main components: the Core, Profiles, and Implementation Tiers. The Core is a catalog of desired cybersecurity activities and outcomes using common language that is easy to understand. A CSF profile is an alignment of organizational requirements, objectives, risk appetite, and resources against the desired outcomes of the CSF Core. Profiles are primarily used to identify and prioritize opportunities for improving cybersecurity at an organization. Implementation Tiers guide organizations to consider the appropriate level of rigor for their cybersecurity program and can be used as a communication tool to discuss risk appetite, mission priority, and budget. (Although part of the CSF, for the purposes of this Profile further discussion on Implementation Tiers is not included.)

3.1. The Cybersecurity Framework Core

The CSF presents industry standards, guidelines, and practices in a manner that allows for communication of cybersecurity activities and outcomes across the organization, including executive leadership and those responsible for operations. The CSF Core consists of five concurrent and continuous Functions—Identify, Protect, Detect, Respond, Recover. When considered together, these Functions provide a high-level, strategic view for cybersecurity risk management of an organization's cybersecurity posture. The CSF further identifies underlying key Categories and Subcategories for each Function and matches them with example Informative References, such as existing standards, guidelines, and practices for each Subcategory. The five Functions include 23 Categories of cybersecurity outcomes and Subcategories that further divide the Categories into more specific technical or management activities. The 23 Categories are spread across the Functions associated with Table 1 through Table 5.

The five Functions of the CSF Core are defined below:

- Identify Develop the organizational understanding to manage cybersecurity risk to systems, assets, data, and capabilities. The activities in the Identify Function are foundational for effective use of the CSF. Understanding the business context, the resources that support critical functions, and the related cybersecurity risks enables an organization to focus and prioritize its efforts, consistent with its risk management strategy and business needs. Examples of outcome Categories within this Function include Asset Management, Business Environment, Governance, Risk Assessment, and Risk Management Strategy.
- Protect Develop and implement the appropriate safeguards to ensure delivery of critical
 infrastructure services. The activities in the Protect Function support the ability to limit or
 contain the impact of a potential cybersecurity event. Examples of outcome Categories within

this Function include Identity Management and Access Control, Awareness and Training, Data Security; Information Protection Processes and Procedures, Maintenance; and Protective Technology.

- Detect Develop and implement the appropriate activities to identify the occurrence of a
 cybersecurity event. The activities in the Detect Function enable timely discovery of
 cybersecurity events. Examples of outcome Categories within this Function include Anomalies
 and Events, Security Continuous Monitoring, and Detection Processes.
- Respond Develop and implement the appropriate activities to act on a detected cybersecurity
 event. The activities in the Respond Function support the ability to contain the impact of a
 potential cybersecurity event. Examples of outcome Categories within this Function include
 Response Planning, Communications, Analysis, Mitigation, and Improvements.
- **Recover** Develop and implement the appropriate activities to maintain plans for resilience and to restore any capabilities or services that were impaired due to a cybersecurity event. The activities in the Recover Function support timely recovery to normal operations to reduce the impact from a cybersecurity event. Examples of outcome Categories within this Function include Recovery Planning, Improvements, and Communications.

Table 1. Cybersecurity Framework Categories for the Identify (ID) Function.

Category	Identifier	Description
Asset Management	ID.AM	The data, personnel, devices, systems, and facilities that enable the organization to achieve business purposes are identified and managed consistent with their relative importance to organizational objectives and the organization's risk strategy.
Business Environment	ID.BE	The organization's mission, objectives, stakeholders, and activities are understood and prioritized; this information is used to inform cybersecurity roles, responsibilities, and risk management decisions.
Governance	ID.GV	The policies, procedures, and processes to manage and monitor the organization's regulatory, legal, risk, environmental, and operational requirements are understood and inform the management of cybersecurity risk.
Risk Assessment	ID.RA	The organization understands the cybersecurity risk to organizational operations (including mission, functions, image, or reputation), organizational assets, and individuals.
Risk Management Strategy	ID.RM	The organization's priorities, constraints, risk tolerances, and assumptions are established and used to support operational risk decisions.

Category	Identifier	Description
Supply Chain Risk Management	ID.SC	The organization's priorities, constraints, risk tolerances, and assumptions are established and used to support risk decisions associated with managing supply chain risk. The organization has established and implemented the processes to identify, assess and manage supply chain risks.

Table 2. Cybersecurity Framework Categories for the Protect (PR) Function.

Category	Identifier	Description
Identity Management, Authentication and Access Control	PR.AC	Access to physical and logical assets and associated facilities is limited to authorized users, processes, and devices, and is managed consistent with the assessed risk of unauthorized access to authorized activities and transactions.
Awareness and Training	PR.AT	The organization's personnel and partners are provided cybersecurity awareness education and are trained to perform their cybersecurity-related duties and responsibilities consistent with related policies, procedures, and agreements.
Data Security	PR.DS	Information and records (data) are managed consistent with the organization's risk strategy to protect the confidentiality, integrity, and availability of information.
Information Protection Processes and Procedures	PR.IP	Security policies (that address purpose, scope, roles, responsibilities, management commitment, and coordination among organizational entities), processes, and procedures are maintained and used to manage protection of information systems and assets.
Maintenance	PR.MA	Maintenance and repairs of industrial control and information system components are performed consistent with policies and procedures.
Protective Technology	PR.PT	Technical security solutions are managed to ensure the security and resilience of systems and assets, consistent with related policies, procedures, and agreements.

 Table 3. Cybersecurity Framework Categories for the Detect (DE) Function.

Category	Identifier	Description
Anomalies and Events	DE.AE	Anomalous activity is detected, and the potential impact of events is understood.

Category	Identifier	Description
Security Continuous Monitoring	DE.CM	The information system and assets are monitored to identify cybersecurity events and verify the effectiveness of protective measures.
Detection Processes	DE.DP	Detection processes and procedures are maintained and tested to ensure awareness of anomalous events.

Table 4. Cybersecurity Framework Categories for the Respond (RS) Function.

Category	Identifier	Description
Response Planning	RS.RP	Response processes and procedures are executed and maintained, to ensure response to detected cybersecurity incidents.
Communications	RS.CO	Response activities are coordinated with internal and external stakeholders (e.g., external support from law enforcement agencies).
Analysis	RS.AN	Analysis is conducted to ensure effective response and support recovery activities.
Mitigation	RS.MI	Activities are performed to prevent expansion of an event, mitigate its effects, and resolve the incident.
Improvements	RS.IM	Organizational response activities are improved by incorporating lessons learned from current and previous detection/response activities.

Table 5. Cybersecurity Framework Categories for the Recover (RC) Function.

Category	Identifier	Description
Recovery Planning	RC.RP	Recovery processes and procedures are executed and maintained to ensure restoration of systems or assets affected by cybersecurity incidents.
Improvements	RC.IM	Recovery planning and processes are improved by incorporating lessons learned into future activities.
Communications	RC.CO	Restoration activities are coordinated with internal and external parties (e.g. coordinating centers, Internet Service Providers, owners of attacking systems, victims, other CSIRTs, and vendors).

Concurrent with the development of this LNG Profile, NIST published an initial public draft of NIST SP 800-82 Rev. 3, Guide to Operational Technology (OT) Security [15]. The revision includes additional alignment with other OT security standards and guidelines, including the CSF. This initial draft of NIST SP

800-82 Rev. 3, Guide to (OT) Security has a section dedicated to applying the CSF to OT in which all CSF Functions and selected CSF Categories and Subcategories are covered. Readers may find it useful to reference it as a companion document to this Profile.

3.2. Cybersecurity Framework Profiles

A Profile represents the outcomes based on business needs that an organization has selected from the CSF Categories and Subcategories. Profiles offer a prioritization of NIST CSF Categories and Subcategories based on the mission and operational considerations common to a specific group, such as the LNG sector with the MTS. Profiles serve as a useful starting point for identifying cybersecurity activities and outcomes that may be important to the selected group. Profiles can be used to identify opportunities for improving cybersecurity posture by comparing a "Current" Profile (the "as is" state) with a "Target" Profile (the "to be" state). They also offer an organization a consistent way to discuss cybersecurity objectives across organizational roles—from senior leadership to technical implementors—using common terminology. Individuals within the organization can use the Profile to prioritize the allocation of resources to cybersecurity improvements or to areas of particular concern.

Development of a Profile starts with the identification of an organization's mission objectives, high-level goals that must be achieved for the organization to succeed at its primary mission. The mission objectives provide the necessary context for an organization to manage its cybersecurity risk as it relates to a specific mission need. CSF Categories and Subcategories especially relevant to each mission objective are then identified and prioritized to fit the needs of the organization. Mission objectives identified in this CSF Profile are those that may be common to organizations in the LNG industry but recognizes that individual mission objectives may vary by organization.

4. Cybersecurity Profile Development Methodology

Developing a Profile is a collaborative, stakeholder-driven process. To ensure that the Profile aligns cybersecurity outcomes with mission requirements, input from stakeholders and experts in a particular field is critical. This methodology lays out how NIST gathered input and garnered consensus from a group of LNG industry stakeholders to produce this Profile. This methodology is one approach to achieving consensus among stakeholders but is not the only way to do so.

4.1. Stakeholder Workshops

Profile workshops are conducted with stakeholders to establish agreed-on mission objectives, prioritize those mission objectives, and identify priority CSF Categories for each Mission objective. The output from these workshops serves as input for developing Profiles. The workshops are typically held in person, over the course of multiple days, with stakeholders and facilitators gathered in a single collaborative space. Workshops for this Profile occurred in the spring and summer months of 2021 during the COVID-19 pandemic. Facilitators conducted three separate online workshops with LNG industry stakeholders hereafter known as **participants**. Workshops were conducted under the

assumption that participants could identify LNG assets critical to safety and emergency preparedness. The goals of these workshops were for the participants to:

- Identify and describe high-level mission objectives for managing and maintaining LNG operations.
- Engage in a scoring exercise of the identified mission objectives based on importance/criticality to LNG infrastructure.
- Engage in a prioritization exercise of the CSF Categories for each mission objective.

Participants were from oil and natural gas corporations, infrastructure companies, U.S. LNG export facilities, and individuals from other related LNG companies. The workshops are described below and were facilitated by MITRE staff [16].

4.1.1. Workshop 1: Establishing Mission Objectives

The first workshop was conducted on May 13, 2021 [17]. In advance of the workshop, participants were provided with an overview of the goals for the workshop and a copy of the CSF.

During the workshop, facilitators provided an overview of the CSF and discussed why a CSF profile is helpful as a construct for consistently managing cybersecurity risk. Facilitators then shared a short example on how to create mission objectives. After working through the example, facilitators guided participants through an activity focused on identifying candidate LNG Mission objectives. The candidate mission objectives were designed to consider what business or operational functions are critical to support LNG operations. After identifying an initial set of candidate mission objectives, participants worked with each other and facilitators to refine a non-prioritized list of consensus candidate mission objectives.

Following this session, participants received a non-prioritized list of consensus candidate mission objectives and associated descriptions to prepare for workshop 2 and 3 discussions and exercises.

4.1.2. Workshop 2: Prioritizing Mission Objectives

The second workshop was conducted on May 20, 2021 [18]. Facilitators led a mission objective prioritization exercise used by the facilitators in previous CSF development workshops to identify the relative importance of each mission objective to LNG operations. This scoring system entails participants assigning a score of 1, 3, 5, 8, or 13 to each mission objective to indicate their importance within the overall mission of the LNG industry, with 1 being the lowest, and 13 the highest. Experienced facilitators have found that the asymmetry of this scale can help distinguish between scores (13 is intuitively more important than 3, or even 8) and help facilitate discussion among participants.

Facilitators used their best judgment to select each mission objective such that lower importance mission objectives would be scored earlier in the process. After assigning scores for the selected mission objective, participants engaged in a facilitated discussion during which they explained the reasoning behind each assigned score. The discussion offered opportunities for LNG industry participants to offer some recommended actions for each mission objective. The recommended actions are documented in Sec. 5 as "Organization should:" statements for each mission objective. The CSF was not pushed by facilitators as a reference source for the language of the recommended actions.

Once all candidate mission objectives were scored, the workshop ended with a brief review of CSF Categories and the process as preparation for the next workshop on identifying high-priority CSF Categories for inclusion in this Profile.

After the workshop, LNG industry participants' scores were analyzed to produce a prioritized ranking of LNG mission objectives which appear in priority order in <u>Table 6</u>.

4.1.3. Workshop 3: Prioritizing CSF Categories for Mission Objectives

The final workshop was conducted on May 27, 2021 [19]. Prior to this workshop, facilitators distributed a scoresheet for participants to complete before the meeting. Participants were instructed to identify the three most important CSF Categories for each mission objective, assigning the Categories a score of 1 for the highest, then 2, then 3. For CSF Functions that did not have any Categories scored as 1, 2, or 3, participants were asked to pick the Category for each Function that best supports the mission objective. These categories were referred to as "starred Categories."

During a facilitated discussion, participants shared the Categories they identified as important to or supportive of each mission objective and explained how they arrived at their conclusions. Participants provided input and adjusted their Category selections as discussions continued. For each mission objective, participants' selections were recorded on a master scoresheet. At the end of the workshop, the facilitators asked those whose scores had changed to send their updated Category scoresheets to allow for updates to the master scoresheet.

Following the final workshop, participants' CSF Category selections were tallied to determine relative priorities for Categories under each mission objective. This analysis is shown in <u>Sec. 6</u>.

4.2. Subcategory Scoring

The facilitators held six Subcategory scoring sessions from June 9, 2021, to July 14, 2021, and worked with participants to identify the relative importance of CSF Subcategories for each Mission objective. During the scoring sessions, participants identified priorities for each CSF Subcategory. For each Mission objective, facilitators walked the group through high-ranked Categories. The group discussed and identified high- and medium-priority Subcategories, which were marked with three dots and two dots, respectively. All other Subcategories in the section were then noted with a single dot. Note that one Subcategory had additional considerations due to the nature of the OT environment. Those Subcategories with additional consideration are denoted using the " \otimes " symbol in the dot charts in Sec. 7.

Next, the group ranked each of the three-dot, two-dot, and one-dot Subcategories by priority and importance to distinguish between multiple Subcategories with the same dot allocation. This process was repeated for medium-ranked categories, which were then starred. Some scoring sessions had additional time remaining, which was used to revisit Categories that were not indicated as high, medium, or starred during the mission objectives weighted scoring workbook analysis. These Categories underwent the same scoring and ranking process. Subcategory priorities are shown in Sec. 7.

5. Liquefied Natural Gas Industry Mission Objectives

Participants from the oil and natural gas industry participated in the online workshops and identified nine mission objectives for the LNG industry. Participants provided descriptions of and summarized rationales for the ranked mission objectives during workshop exercises and discussions.

These mission objectives were prioritized by the participants, and their prioritization is meant to be informative rather than prescriptive. Each organization should consider its own goals and priorities when consulting this Profile and adjust how the organization may apply guidance accordingly.

 Table 6. Liquefied Natural Gas Industry Mission Objectives.

Priority	Mission Objective			
1	Maintain Safe and Secure Operations			
2	Ensure Operational Integrity of Plant Systems and Processes			
3	Control Operational and Enterprise Security and Access			
4	Monitor, Detect, and Respond to Anomalous Behavior			
5	Safeguard the Environment			
6	Define Policy and Governance Actions that Capture/Protect the Mission			
7	Maintain Regulatory Compliance			
8	Continuously Optimize and Maintain Current Operational State by Establishing Baselines and Measures			
9	Validate and Optimize the Supply Chain			

The participants identified recommended actions for organizations to consider for each mission objective. These recommended actions are shown as the bulleted text after "Organizations should:" in the following sections.

5.1. Mission Objective-1: Maintain Safe and Secure Operations

Organizations identify operational and cybersecurity vulnerabilities and threats that could affect personnel safety and continuity of operations. Considerations include how to maintain regulatory compliance and methods for securing the multi-operator environment. This mission objective results in the implementation of measures that prevent loss of plant control, infrastructure and systems view, and proprietary information.

Organizations should:

- Manage risks to the organization and industry using a structured risk management process.
- Ensure compliance with regulations put forth by governing bodies.
- Train personnel to be aware of proper usage of systems and equipment, process hazards, and cybersecurity threats.

• Implement Detect/Respond/Recover activities where adverse events affect personnel safety and security and incorporate lessons learned to enhance future security postures.

Ranking Rationale: Participants agreed that maintaining safe and secure operations is critical to the LNG process. Safe and secure operations encompass activities such as establishing safety procedures at the plant and among employees, training, and education, and acknowledging safety indicators. Human safety and the protection of human life are at the forefront of chief executive officer-level discussions and are a critical part of maintaining plant security.

5.2. Mission Objective-2: Ensure Operational Integrity of Plant Systems and Processes

LNG operators look to ensure the integrity of hardware, software, and processes to prevent loss of control and continue operation of facilities. This includes the management of product and system lifecycles to guarantee sustained functionality and the verification of implemented processes for desired outcomes.

Organizations should:

- Employ administrative, physical, and technical safeguards on plant systems.
- Implement acquisitions management, change controls, and obsolescence and lifecycle management.
- Maintain product integrity through continuous quality testing, monitoring containment and shipments, and equipment inspection.
- Establish procedures for integrity measurement, including:
 - Systems testing
 - Preventive maintenance
 - o Remediation
 - Ongoing situational awareness
 - o Process review
- Architect fault-tolerant systems to maintain operational integrity during adverse events.
- Define policy to outline standard operating procedure to maintain repeatable processes with anticipated outcomes.

Ranking Rationale: The mission objective captures the necessary measures for maintaining plant and equipment safety. Those activities (e.g., maintaining plant systems, preventing breaches) are crucial to ensuring operational integrity both in the plants and during the liquefaction process. For the LNG lifecycle to function safely and efficiently, implementations to support this mission objective need to be present on the systems and operational sides.

5.3. Mission Objective-3: Control Operational and Enterprise Security and Access

LNG industry partners maintain their security profiles by identifying security risks and applying controls to mitigate them with a goal of preventing breaches that will impact operations. This can be achieved through understanding business workflow; event monitoring, detection, and logging; controlling physical and remote access to sites, systems, and assets; and revising current security policies based on ongoing risk-measurement processes and findings.

Organizations should:

- Establish separation between safety systems, distributed control systems, and other operational technology.
- Monitor network activity and inspect incoming data and payloads for threats to systems.
- Identify and train personnel on interdependencies between cybersecurity and operational responsibilities.
- Control physical and technical access to infrastructure and systems.
- Ensure confidentiality of sensitive data, plans, and procedures, with an emphasis on sensitive data

Ranking Rationale: This mission objective emphasizes the importance of having safeguards in place to protect the physical security and cybersecurity of LNG plants and ports, which includes concerns with access. Participants noted that protection of OT is critical; therefore, processes and procedures need to be in place to control access to the plants and systems (e.g., access to workstations, vetting process, plant locations) as well as the information systems required to manage the access control (e.g., badge readers, surveillance cameras). This mission objective was ranked in this order because it is imperative to the success of maintaining human and equipment safety.

5.4. Mission Objective-4: Monitor, Detect, and Respond to Anomalous Behavior

LNG operations must include monitoring for anomalous activity to maintain situational awareness. To detect anomalies, security baselining the operation may be necessary. Detected activity is correlated against other events in order to extrapolate indicators of compromise supporting an organization's ability to disrupt the cyber kill-chain.

Organizations should:

- Monitor the behavior of personnel, machinery, and systems using methods that are robust while also maintaining privacy.
- Detect anomalous behavior of personnel, machinery, and systems efficiently and accurately.
- Respond to anomalous behavior of personnel, machinery, and systems using effective and highly structured mechanisms.

Ranking Rationale: Participants stated that once a baseline is established to determine what constitutes normal behavior of an LNG plant, it then becomes necessary to monitor for deviations and possible events. Additionally, some participants viewed recovery and remediation efforts as important actions in maintaining LNG operations.

5.5. Mission Objective-5: Safeguard the Environment

The integrity of the environment must be protected to maintain the sustainability of operations and the organization's mission. Effects of malicious cyber activities on process control systems can have a significant impact on the environment.

Organizations should:

• Identify cybersecurity risks that could impact the environment.

- Apply structured processes to manage risks to the environment.
- Train personnel that cybersecurity risk and environmental risk are interrelated.
- Manage the prominent and increasing roles of automated systems in maintaining quality control of processes that may impact the environment.
- Implement Detect/Respond/Recover activities where cybersecurity incidents may result in an adverse impact on the environment.
- Adhere to safety protocols.

Ranking Rationale: Participants reported that safeguarding environmental integrity is significant for public safety and from a business perspective for the LNG industry. Environmental incidents can cause irreparable damage to humans and ecosystems. Culpable organizations face legal consequences, loss of brand reputation, and decreased profits. According to participants, these incidents are often a byproduct of deficiencies in safety processes or technologies in plant systems. Additionally, ensuring the physical security and cybersecurity of plant systems can help to safeguard environmental integrity.

5.6. Mission Objective-6: Define Policy and Governance Actions that Capture/Protect the Mission

Policy and governance actions should include development of documented cybersecurity plans, processes, and procedures. Security policies define organizational leadership's expectations for the way that cybersecurity is to be managed. IT and OT functions often differ in terms of operational and cybersecurity requirements. In some cases, separate policies may be necessary to adequately capture organizational leadership's expectations. Policies and procedures should be kept consistent across organizational functions, where possible, to better enable efficient operations. Organizations should strive to achieve an appropriate balance between documenting expectations at a sufficient level of detail and creating policies that are easy to understand and maintain.

Organizations should:

- Define business policy to encapsulate and promote a clear understanding of the mission objectives, operations, and safeguards.
- Define governance actions that ensure the mission.

Ranking Rationale: This mission objective covers business policy that governs the LNG industry, including processes, vessels, technology, and physical sites. Individual organizational policies not only pave the way toward complying with government regulations but will also strengthen the organization's cybersecurity culture. Participants viewed governance as foundational for both establishing best practices and making improvements in other areas of the business. As such, governance should also be foundational for establishing best practices and making improvements to cybersecurity risk mitigation. Additionally, it is important in driving and supporting the goals and standards that the organization is trying to reach.

5.7. Mission Objective-7: Maintain Regulatory Compliance

Organizations ensure operational plans and procedures are in accordance with regulatory standards and best practices to maintain operations. Protocols and procedures are established and aligned at the organizational level to facilitate regulatory compliance.

Organizations should:

- Maintain updated systems including IT/OT, and upgrade/patch systems as necessary.
- Ensure a safe and secure vessel and facility environment.
- Adhere to risk tolerance thresholds that meet regulatory standards.
- Develop and maintain plans and procedures that detail maintenance of devices and process monitoring. The plans and procedures should reflect accepted levels of risk outlined in organizational risk management procedures.
- Identify activities that can be completed to accomplish/meet the mission objective.

Ranking Rationale: When ranking Mission Objective 7, participants stated that maintaining regulatory compliance is necessary to ensure safety for humans, the environment, and the plant. Failure to comply with regulations can result in legal and financial ramifications and lead to plant shutdowns. Compliance can act as a baseline with varying levels of maturity within different areas. Mission Objectives 6 and 7 share similarities; however, regulatory compliance was ranked below corporate governance because participants stated that if governance is well established and followed, then compliance will happen naturally.

5.8. Mission Objective-8: Continuously Optimize and Maintain Current Operational State by Establishing Baselines and Measures

Organizations operate iteratively to elevate "actual state" to "desired state" by clearly defining events, threshold triggers, and remediation efforts in corporate policies.

Organizations should:

- Determine a schedule and develop a plan for efficacy measures, which include testing, preventative maintenance, remediation, and ongoing situational awareness.
- Establish and leverage communication paths and trend data from devices to identify deviations from baseline traffic flows.
- Document training and awareness procedures for potential cybersecurity risk vectors.

Ranking Rationale: This mission objective entails establishing baselines in order to bring the actual business state in line with the desired business state. These measurements are critical for maintaining quality control but also for making improvements on equipment and processes. Participants deemed that by following corporate governance and regulatory compliance standards, which are both higher-ranked mission objectives, quality control would be done by default.

5.9. Mission Objective-9: Validate and Optimize the Supply Chain

Organizations mitigate supply chain risks in the procurement of information and communications technology and services through clear vendor agreements and established processes and procedures (including testing) prior to installation and updates.

Organizations should:

- Vet vendors and suppliers when purchasing hardware, software, and system components as well as when implementing configuration control.
- Ensure third-party vendor controls and cybersecurity maturity levels align with the organization.
- Identify and streamline current business acquisition processes to optimize implementation of cybersecurity standards, protocols, and best practices across the enterprise risk management plan.

Ranking Rationale: Participants maintained that handling the supply chain is important but indicated that certain aspects were beyond the organization's control. They stated that a large aspect of the supply chain is vetting other companies and third parties for best practices and a cybersecurity maturity level that aligns with the organization's maturity level. Implementing protections internally and establishing communication with vendors can help protect both the business and its partners from unintended consequences.

6. Category Prioritization Summary

Workshop participants were asked to identify Categories most relevant to each mission objective, and then to prioritize those Categories as high-priority, medium-priority, or starred-priority using the following descriptions:

- High-Priority Categories were considered the most critical for accomplishing a mission objective.
- **Medium-Priority** Categories were considered important to a mission objective, although not as important as high-priority Categories.
- **Starred-Priority** Categories were identified as being relevant to a mission objective, but not with the same urgency as other priority Categories.

Profiles should be tailored to individual operating environments and organizational risk tolerances. The identified Category priorities, shown in <u>Sec. 6.1</u>, are intended to help focus resources on cybersecurity activities that participants identified as particularly relevant. The intent of this Profile is to suggest areas of focus priority pertinent to the LNG lifecycle. A user of this Profile could repeat the workshop steps to develop their own Profile based on their organization's unique needs and resource considerations.

The tables in <u>Sec. 6.1</u> do not include the following Categories: Awareness and Training (PR.AT), Detection Processes (DE.DP), Communications (RS.CO), Analysis (RS.AN), Mitigation (RS.MI), Improvements (RS.IM), Improvements (RC.IM), and Communications (RC.CO). The workshop participants did not identify these Categories as relevant during the workshop. An organization should review all Categories when identifying high-priority, medium-priority, and starred-priority Categories on which it needs to focus.

6.1. Prioritized Cybersecurity Framework Categories by Mission Objective

Table 7. Prioritized CSF Categories for Mission Objective-1: Maintain Safe and Secure Operations.

Function	High Priority	Medium Priority	Starred Priority
IDENTIFY		Risk Assessment (ID.RA)	Asset Management (ID.AM)
PROTECT	Protective Technology (PR.PT)	Identity Management, Authentication and Access Control (PR.AC)	
DETECT		Security Continuous Monitoring (DE.CM)	
RESPOND			Response Planning (RS.RP)
RECOVER			Recovery Planning (RC.RP)

Table 8. Prioritized CSFs Categories for Mission Objective-2: Ensure Operational Integrity of Plant Systems and Processes.

Function	High Priority	Medium Priority	Starred Priority
IDENTIFY	Asset Management (ID.AM)	Risk Management (ID.RM)	
PROTECT		Maintenance (PR.MA), Protective Technology (PR.PT)	
DETECT			Security Continuous Monitoring (DE.CM)
RESPOND			Response Planning (RS.RP)
RECOVER			Recovery Planning (RC.RP)

Table 9. Prioritized CSF Categories for Mission Objective-3: Control Operational and Enterprise Security and Access.

Function	High Priority	Medium Priority	Starred Priority
IDENTIFY			
PROTECT	Identity Management, Authentication and Access Control (PR.AC)	Data Security (PR.DS), Information Protection Processes and Procedures (PR.IP)	
DETECT			Security Continuous Monitoring (DE.CM)
RESPOND			Response Planning (RS.RP)

Function	High Priority	Medium Priority	Starred Priority
RECOVER			Recovery Planning (RC.RP)

Table 10. Prioritized CSF Categories for Mission Objective-4: Monitor, Detect, and Respond to Anomalous Behavior.

Function	High Priority	Medium Priority	Starred Priority
IDENTIFY		Asset Management (ID.AM)	
PROTECT			Information Protection Processes and Procedures (PR.IP)
DETECT	Anomalies and Events (DE.AE)		
RESPOND		Response Planning (RS.RP)	
RECOVER			Recovery Planning (RC.RP)

Table 11. Prioritized CSF Categories for Mission Objective-5: Safeguard the Environment.

Function	High Priority	Medium Priority	Starred Priority
IDENTIFY	Asset Management (ID.AM)	Governance (ID.GV)	
PROTECT	Data Security (PR.DS)		
	Maintenance (PR.MA)		
DETECT			Anomalies and Events (DE.AE)
RESPOND			Response Planning (RS.RP)
RECOVER			Recovery Planning (RC.RP)

Table 12. Prioritized CSF Categories for Mission Objective-6: Define Policy and Governance Actions that Capture/Protect the Mission.

Function	High Priority	Medium Priority	Starred Priority
IDENTIFY	Governance (ID.GV)	Business Environment (ID.BE)	
PROTECT		Information Protection Processes and Procedures (PR.IP)	
DETECT			Security Continuous Monitoring (DE.CM)
RESPOND			Response Planning (RS.RP)

Function	High Priority	Medium Priority	Starred Priority
RECOVER			Recovery Planning (RC.RP)

Table 13. Prioritized CSF Categories for Mission Objective-7: Maintain Regulatory Compliance.

Function	High Priority	Medium Priority	Starred Priority
IDENTIFY	Governance (ID.GV)	Risk Assessment (ID.RA)	
PROTECT		Information Protection Processes and Procedures (PR.IP)	
DETECT		Anomalies and Events (DE.AE)	Security Continuous Monitoring (DE.CM)
RESPOND			Response Planning (RS.RP)
RECOVER			Recovery Planning (RC.RP)

Table 14. Prioritized CSF Categories for Mission Objective-8: Continuously Optimize and Maintain Current Operational State by Establishing Baselines and Measures.

Function	High Priority	Medium Priority	Starred Priority
IDENTIFY	Asset Management (ID.AM)		
PROTECT		Data Security (PR.DS)	
DETECT	Security Continuous Monitoring (DE.CM)	Anomalies and Events (DE.AE)	
RESPOND			Response Planning (RS.RP)
RECOVER			Recovery Planning (RC.RP)

Table 15. Prioritized CSF Categories for Mission Objective-9: Validate and Optimize the Supply Chain.

Function	High Priority	Medium Priority	Starred Priority
IDENTIFY	Supply Chain Risk Management (ID.SC), Asset Management (ID.AM)		
PROTECT			Information Protection Processes and Procedures (PR.IP)
DETECT			Security Continuous Monitoring (DE.CM)

Function	High Priority	Medium Priority	Starred Priority
RESPOND			Response Planning (RS.RP)
RECOVER			Recovery Planning (RC.RP)

6.2. Summary Table

This table presents a summary of CSF Category relevance for all mission objectives, to show similarities and differences across Mission objectives; each objective is identified by its Priority in <u>Table 6</u> in the tables below.

In the tables, **H** stands for High Priority. **M** stands for Medium Priority. An asterisk (*) stands for Starred Priority. These are categories that were prioritized for a mission objective, but not with the same urgency as other priority Categories.

Table 16. Summary Table of Mission Objectives with Identify Function Category Priorities.

Identify Function Category	1	2	3	4	5	6	7	8	9
Asset Management (ID.AM)	*	Н		М	Н			Н	Н
Business Environment (ID.BE)						М			
Governance (ID.GV)					М	Н	Н		
Risk Assessment (ID.RA)	М						М		
Risk Management Strategy (ID.RM)		М							
Supply Chain Risk Management (ID.SC)									Н

Table 17. Summary Table of Mission Objectives with Protect Function Category Priorities.

Protect Function Category	1	2	3	4	5	6	7	8	9
Access Control (PR.AC)	М		Н		Н				
Awareness and Training (PR.AT)									
Data Security (PR.DS)			М		Н			М	
Information Protection Processes & Procedures (PR.IP)			М	*		М	М		*
Maintenance (PR.MA)		М			Н				
Protective Technology (PR.PT)	Н	М							

Table 18. Summary Table of Mission Objectives with Detect Function Category Priorities.

Detect Function Category	1	2	3	4	5	6	7	8	9
Anomalies and Events (DE.AE)				Η	*		М	М	
Security Continuous Monitoring (DE.CM)	М	*	*			*	*	Н	*
Detection Processes (DE.DP)									

Table 19. Summary Table of Mission Objectives with Respond Function Category Priorities.

Respond Function Category	1	2	3	4	5	6	7	8	9
Response Planning (RS.RP)	*	*	*	М	*	*	*	*	*
Communications (RS.CO)									
Analysis (RS.AN)									
Mitigation (RS.MI)									
Improvements (RS.IM)									

Table 20. Summary Table of Mission Objectives with Recover Function Category Priorities.

Recover Function Category	1	2	3	4	5	6	7	8	9
Recovery Planning (RC.RP)	*	*	*	*	*	*	*	*	*
Improvements (RC.IM)									
Communications (RC.CO)									

7. Priority Cybersecurity Framework Subcategories by Mission Objective

Following the workshops, the participants determined which CSF Subcategories were most relevant to each mission objective.

7.1. Cybersecurity Framework Subcategory Priority Chart

Users of the Profile working to improve the security of the LNG industry should conduct activities in support of all applicable Subcategories of the CSF. This Profile recognizes and specifies a subset of those CSF Subcategories to help organizations prioritize cybersecurity risk mitigations they have yet to address. This Profile was developed to serve most of the LNG industry's needs and, as such, was not developed to provide guidance on any action to be taken by an LNG organization. Those consulting this document should, as appropriate or necessary, emphasize (or de-emphasize) the importance of Subcategories depending on the unique needs of their organizations.

The "dot charts" in Tables 21–43 capture the relative importance of each CSF Subcategory to each mission objective. From the perspective of the participants, who contributed to the development of this Profile, some CSF Subcategories are more critical than others to support the cybersecurity needs of LNG Operations Mission Objectives. To that end, CSF Subcategories are divided into four types for the purposes of this Profile:

- High Priority (●●●): The most critical Subcategories for enabling a mission objective in support
 of LNG operations. These Subcategories should be addressed most immediately given available
 resources.
- Medium Priority (●●): Subcategories that could be as urgent as high-priority Subcategories but
 most likely only in certain contexts or environments. Although considered lower priority, these
 Subcategories should be addressed to support the mission objective; however, they may not
 need to be addressed as immediately as high-priority Subcategories.
- **Starred Priority** (•): Subcategories that are important to the overall cybersecurity of the mission objective but may not require the same level of urgency as higher-priority Subcategories.
- Additional Consideration (⊗): Subcategories that require additional consideration due to the unique properties and potential impacts to Operational Technology systems.

In this Profile, the Subcategory, **DE.CM-8: Vulnerability scans are performed**, is identified in <u>Table 34</u> as requiring additional considerations. This was done to highlight that vulnerability scans on OT equipment may have a negative impact on achieving the following mission objectives:

Mission Objective-2: Ensure Operational Integrity of Plant Systems and Processes

Mission Objective-3: Control Operational and Enterprise Security and Access

Mission Objective-8: Continuously Optimize and Maintain Current Operational State by Establishing Baselines and Measures

Concurrent with the development of this LNG Profile, NIST published an initial public draft of *NIST SP* 800-82 Rev. 3, Guide to Operational Technology (OT) Security [15]. Rev. 3 includes additional alignment with other OT security standards and guidelines, including the CSF. This initial draft of *NIST SP* 800-82 Rev. 3, Guide to Operational Technology (OT) Security has a section dedicated to applying the CSF to OT in which all CSF Functions and selected CSF Categories and Subcategories are covered.

NIST SP 800-82 Rev. 3 highlights **OT-Specific Recommendations and Guidance** for each Subcategory. Users may find the OT-Specific Recommendations and Guidance for some Subcategories to be useful to identify additional considerations relevant to their organization.

 Table 21. CSF Subcategory Priorities for the Identify Function's Asset Management (ID.AM) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
ID.AM-1	Physical devices and systems within the organization are inventoried	•••	•••	•	•••	•••	•	•	•••	••
ID.AM-2	Software platforms and applications within the organization are inventoried	•••	•••	•	•••	•••	•	•	•••	••
ID.AM-3	Organizational communication and data flows are mapped	•••	•••	•	•••	•••	•	•	••	••
ID.AM-4	External information systems are catalogued	••	•••	•	•••	•••	•	•	•••	•••
ID.AM-5	Resources (e.g., hardware, devices, data, time, personnel, and software) are prioritized based on their classification, criticality, and business value	•••	•••	•	••	••	•	•	••	•••
ID.AM-6	Cybersecurity roles and responsibilities for the entire workforce and third-party stakeholders (e.g., suppliers, customers, partners) are established	••	•••	•	•••	•••	•	•	•	•

 Table 22. CSF Subcategory Priorities for the Identify Function's Business Environment (ID.BE) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
ID.BE-1	The organization's role in the supply chain is identified and communicated.	•	•	•	•	•	•••	•	•	•
ID.BE-2	The organization's place in critical infrastructure and its industry sector is identified and communicated.	•	•	•	•	•	•••	•	•	•
ID.BE-3	Priorities for organizational mission, objectives, and activities are established and communicated.	•	•	•	•	•	•••	•	•	•

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
ID.BE-4	Dependencies and critical functions for delivery of critical services are established.	•	•	•	•	•	••	•	•	•
ID.BE-5	Resilience requirements to support delivery of critical services are established for all operating states (e.g., under duress/attack, during recovery, normal operations).	•	•	•	•	•	••	•	•	•

Table 23. CSF Subcategory Priorities for the Identify Function's Governance (ID.GV) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
ID.GV-1	Organizational cybersecurity policy is established and communicated.	•	•	•	•	•••	•••	•••	•	•
ID.GV-2	Cybersecurity roles and responsibilities are coordinated and aligned with internal roles and external partners.	•	•	•	•	••	•••	••	•	•
ID.GV-3	Legal and regulatory requirements regarding cybersecurity, including privacy and civil liberties obligations, are understood and managed.	•	•	•	•	•••	••	•••	•	•
ID.GV-4	Governance and risk management processes address cybersecurity risks.	•	•	•	•	•••	•••	•••	•	•

 Table 24. CSF Subcategory Priorities for the Identify Function's Risk Assessment (ID.RA) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
ID.RA-1	Asset vulnerabilities are identified and documented.	•••	•	•	•	•	•	••	•	•

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
ID.RA-2	Cyber threat intelligence is received from information sharing forums and sources.	•••	•	•	•	•	•	•	•	•
ID.RA-3	Threats, both internal and external, are identified and documented.	•••	•	•	•	•	•	•	•	•
ID.RA-4	Potential business impacts and likelihoods are identified.	•••	•	•	•	•	•	•••	•	•
ID.RA-5	Threats, vulnerabilities, likelihoods, and impacts are used to determine risk.	•••	•	•	•	•	•	•••	•	•
ID.RA-6	Risk responses are identified and prioritized.	•••	•	•	•	•	•	•••	•	•

Table 25. CSF Subcategory Priorities for the Identify Function's Risk Management Strategy (ID.RM) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
ID.RM-1	Risk management processes are established, managed, and agreed to by organizational stakeholders Asset vulnerabilities are identified and documented.	•••	•••	•	•	•	•	•	•	•
ID.RM-2	Organizational risk tolerance is determined and clearly expressed.	•••	•••	•	•	•	•	•	•	•
ID.RM-3	The organization's determination of risk tolerance is informed by its role in critical infrastructure and sector specific risk analysis.	•	•••	•	•	•	•	•	•	•

Table 26. CSF Subcategory Priorities for the Identify Function's Supply Chain Management (ID.SC) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
ID.SC-1	Cyber supply chain risk management processes are identified, established, assessed, managed, and agreed to by organizational stakeholders.	•	•	•	•	•	•	•	•••	•••
ID.SC-2	Suppliers and third-party partners of information systems, components, and services are identified, prioritized, and assessed using a cyber supply chain risk assessment process.	•	•	•	•	•	•	•	•••	•••
ID.SC-3	Contracts with suppliers and third-party partners are used to implement appropriate measures designed to meet the objectives of an organization's cybersecurity program and Cyber Supply Chain Risk Management Plan.	•	•	•	•	•	•	•	•	•••
ID.SC-4	Suppliers and third-party partners are routinely assessed using audits, test results, or other forms of evaluations to confirm they are meeting their contractual obligations.	•	•	•	•	•	•	•	•	••
ID.SC-5	Response and recovery planning and testing are conducted with suppliers and third-party providers.	•	•	•	•	•	•	•	•	•••

Table 27. CSF Subcategory Priorities for the Protect Function's Identity Management, Authentication and Access Control (PR.AC) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
PR.AC-1	Identities and credentials are issued, managed, verified, revoked, and audited for authorized devices, users, and processes.	•••	•	•••	•	•	•	•	•	•
PR.AC-2	Physical access to assets is managed and protected.	•••	•	•••	•	•	•	•	•	•

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
PR.AC-3	Remote access is managed.	•••	•	•••	•	•	•	•	•	•
PR.AC-4	Access permissions and authorizations are managed, incorporating the principles of least privilege and separation of duties.	•••	•	••	•	•	•	•	•	•
PR.AC-5	Network integrity is protected (e.g., network segregation, network segmentation).	•••	•	•••	•	•	•	•	•	•
PR.AC-6	Identities are proofed and bound to credentials and asserted in interactions.	•••	•	••	•	•	•	•	•	•
PR.AC-7	Users, devices, and other assets are authenticated (e.g., single-factor, multi-factor) commensurate with the risk of the transaction (e.g., individuals' security and privacy risks and other organizational risks).	•••	•	••	•	•	•	•	•	•

Table 28. CSF Subcategory Priorities for the Protect Function's Awareness and Training (PR.AT) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
PR.AT-1	All users are informed and trained.	•••	•	•	•	•	•••	•	•	•
PR.AT-2	Privileged users understand their roles and responsibilities.	••	•	•	•	•	•••	•	•	•
PR.AT-3	Third-party stakeholders (e.g., suppliers, customers, partners) understand roles and responsibilities.	•	•	•	•	•	••	•	•	•
PR.AT-4	Senior executives understand their roles and responsibilities.	•	•	•	•	•	••	•	•	•
PR.AT-5	Physical and cybersecurity personnel understand their roles and responsibilities.	••	•	•	•	•	•••	•	•	•

Table 29. CSF Subcategory Priorities for the Protect Function's Data Security (PR.DS) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
PR.DS-1	Data-at-rest is protected.	•••	•	•••	•	•••	•	•	••	•
PR.DS-2	Data-in-transit is protected.	•••	•	•••	•	•••	•	•	•••	•
PR.DS-3	Assets are formally managed throughout removal, transfers, and disposition.	•	•	••	•	••	•	•	••	•
PR.DS-4	Adequate capacity to ensure availability is maintained.	•••	•	•••	•	•••	•	•	•••	•
PR.DS-5	Protections against data leaks are implemented.	••	•	••	•	•••	•	•	•	•
PR.DS-6	Integrity checking mechanisms are used to verify software, firmware, and information integrity.	•	•	••	•	•••	•	•	••	•
PR.DS-7	The development and testing environment(s) are separate from the production environment.	••	•	•••	•	••	•	•	•••	•
PR.DS-8	Integrity checking mechanisms are used to verify hardware integrity.	•	•	•	•	•••	•	•	••	•

Table 30. CSF Subcategory Priorities for the Protect Function's Information Protection Processes and Procedures (PR.IP) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
PR.IP-1	A baseline configuration of information technology/industrial control systems is created and maintained incorporating security principles (e.g. concept of least functionality).	•••	•	•••	•••	•	•••	•••	•	•••
PR.IP-2	A System Development Life Cycle to manage systems is implemented.	•••	•	••	••	•	••	•••	•	•

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
PR.IP-3	Configuration change control processes are in place.	•••	•	•••	•••	•	•••	•••	•	•••
PR.IP-4	Backups of information are conducted, maintained, and tested.	••	•	•••	•••	•	••	••	•	•••
PR.IP-5	Policy and regulations regarding the physical operating environment for organizational assets are met.	•	•	••	•••	•	•••	•••	•	••
PR.IP-6	Data is destroyed according to policy.	•	•	•	•	•	•	•	•	•
PR.IP-7	Protection processes are improved.	•	•	•	••	•	••	••	•	••
PR.IP-8	Effectiveness of protection technologies is shared.	•	•	•	•	•	••	•	•	•
PR.IP-9	Response plans (Incident Response and Business Continuity) and recovery plans (Incident Recovery and Disaster Recovery) are in place and managed.	••	•	•••	•••	•••	•••	••	•	•••
PR.IP-10	Response and recovery plans are tested.	••	•	•••	•••	•	••	••	•	••
PR.IP-11	Cybersecurity is included in human resources practices (e.g., deprovisioning, personnel screening).	••	•	•••	••	•	••	•	•	••
PR.IP-12	A vulnerability management plan is developed and implemented.	••	•	••	••	•	••	•	•	•••

Table 31. CSF Subcategory Priorities for the Protect Function's Maintenance (PR.MA) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
PR.MA-1	Maintenance and repair of organizational assets are performed and logged, with approved and controlled tools.	••	•••	•	•	•••	•	•	•	•

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
PR.MA-2	Remote maintenance of organizational assets is approved, logged, and performed in a manner that prevents unauthorized access.	••	•••	•	•	•••	•	•	•	•

Table 32. CSF Subcategory Priorities for the Protect Function's Protective Technology (PR.PT) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
PR.PT-1	Audit/log records are determined, documented, implemented, and reviewed in accordance with policy.	•••	••	•	•	••	•	•	•	•
PR.PT-2	Removable media is protected and its use restricted according to policy.	••	•••	•	•	•	•	•	•	•
PR.PT-3	The principle of least functionality is incorporated by configuring systems to provide only essential capabilities.	••	•••	•	•	•	•	•	•	•
PR.PT-4	Communications and control networks are protected.	•••	•••	•	•	•	•	•	•	•
PR.PT-5	Mechanisms (e.g., failsafe, load balancing, hot swap) are implemented to achieve resilience requirements in normal and adverse situations.	•••	•••	•	•	•	•	•	•	•

 Table 33. CSF Subcategory Priorities for the Detect Function's Anomalies and Events (DE.AE) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
DE.AE-1	A baseline of network operations and expected data flows for users and systems is established and managed.	••	•	•	•••	•••	•	•	•••	•

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
DE.AE-2	Detected events are analyzed to understand attack targets and methods.	••	•	•	•••	•••	•	•	••	•
DE.AE-3	Event data are collected and correlated from multiple sources and sensors.	•••	•	•	•••	•••	•	•	•••	•
DE.AE-4	Impact of events is determined.	••	•	•	•••	•••	•	•	••	•
DE.AE-5	Incident alert thresholds are established.	•	•	•	••	••	•	•	••	•

 Table 34. CSF Subcategory Priorities for the Detect Function's Security Continuous Monitoring (DE.CM) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
DE.CM-1	The network is monitored to detect potential cybersecurity events	•••	•••	•••	•••	•	••	•••	•••	•••
DE.CM-2	The physical environment is monitored to detect potential cybersecurity events	•••	•••	•••	••	•	••	•••	•••	••
DE.CM-3	Personnel activity is monitored to detect potential cybersecurity events	••	•••	•••	•••	•	•	•	•	•••
DE.CM-4	Malicious code is detected	•••	•••	•••	•••	•	••	••	•••	•••
DE.CM-5	Unauthorized mobile code is detected	••	••	•••	•••	•	•	••	•	•
DE.CM-6	External service provider activity is monitored to detect potential cybersecurity events	•••	•••	•••	•••	•	••	••	••	•••
DE.CM-7	Monitoring for unauthorized personnel, connections, devices, and software is performed	•••	•••	•••	•••	•	•	••	•••	•••
DE.CM-8	Vulnerability scans are performed	⊗ •••	8	⊗ •••	••	•	••	•	8	•••

Table 35. CSF Subcategory Priorities for the Detect Function's Detection Processes (DE.DP) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
DE.DP-1	Roles and responsibilities for detection are well defined to ensure accountability.	•••	•	•	•	•	•	•	•	•
DE.DP-2	Detection activities comply with all applicable requirements.	•••	•	•	•	•	•	•	•	•
DE.DP-3	Detection processes are tested.	•••	•	•	•	•	•	•	•	•
DE.DP-4	Event detection information is communicated.	••	•	•	••	•	•	•	•	•
DE.DP-5	Detection processes are continuously improved.	••	•	•	••	•	•	•	•	•

Table 36. CSF Subcategory Priorities for the Respond Function's Response Planning (RS.RP) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
RS.RP-1	Response plan is executed during or after an incident.	•••	•••	•••	•••	••	••	•••	••	•••

Table 37. CSF Subcategory Priorities for the Respond Function's Communications (RS.CO) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
RS.CO-1	Personnel know their roles and order of operations when a response is needed.	•••	•••	•	•••	•••	•	•	•	•
RS.CO-2	Incidents are reported consistent with established criteria.	•••	••	•	•••	•••	•	•	•	•
RS.CO-3	Information is shared consistent with response plans.	•••	••	•	•••	•	•	•	•	•

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
RS.CO-4	Coordination with stakeholders occurs consistent with response plans.	••	•••	•	•••	•••	•	•	•	•
RS.CO-5	Voluntary information sharing occurs with external stakeholders to achieve broader cybersecurity situational awareness.	•	•	•	•	•••	•	•	•	•

Table 38. CSF Subcategory Priorities for the Respond Function's Analysis (RS.AN) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
RS.AN-1	Notifications from detection systems are investigated.	•••	•••	•	•••	•	•	•	•	•
RS.AN-2	The impact of the incident is understood.	•••	•••	•	••	•	•	•	•	•
RS.AN-3	Forensics are performed.	•	•••	•	•	•••	•	•	•	•
RS.AN-4	Incidents are categorized consistent with response plans.	•	•	•	•	•	•	•	•	•
RS.AN-5	Processes are established to receive, analyze, and respond to vulnerabilities disclosed to the organization from internal and external sources (e.g., internal testing, security bulletins, or security researchers).	••	•••	•	••	•••	•	•	•	•

Table 39. CSF Subcategory Priorities for the Respond Function's Mitigation (RS.MI) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
RS.MI-1	Incidents are contained.	•••	•	•	•••	•••	•	•	•	•
RS.MI-2	Incidents are mitigated.	•••	•	•	•••	•••	•	•	•	•
RS.MI-3	Newly identified vulnerabilities are mitigated or documented as accepted risks.	••	•	•	••	••	•	•	•	•

Table 40. CSF Subcategory Priorities for the Respond Function's Improvements (RS.IM) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
RS.IM-1	Response plans incorporate lessons learned.	••	•	•	••	•	•	•	•	•
RS.IM-2	Response strategies are updated.	••	•	•	••	•	•	•	•	•

 Table 41. CSF Subcategory Priorities for the Recover Function's Recovery Planning (RC.RP) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
RC.RP-1	Recovery plan is executed during or after a cybersecurity incident.	•••	•••	•••	••	•••	••	•••	•••	•••

 Table 42. CSF Subcategory Priorities for the Recover Function's Improvements (RC.IM) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
RC.IM-1	Recovery plans incorporate lessons learned.	•••	•	•	••	•••	•	•	•	•
RC.IM-2	Recovery strategies are updated.	•••	•	•	••	••	•	•	•	•

Table 43. CSF Subcategory Priorities for the Recover Function's Communications (RC.CO) Category.

Subcategory Identifier	Subcategory Description	1	2	3	4	5	6	7	8	9
RC.CO-1	Public relations are managed.	••	•	•	•	•	•	•	•	•
RC.CO-2	Reputation is repaired after an incident.	••	•	•	•	•	•	•	•	•
RC.CO-3	Recovery activities are communicated to internal and external stakeholders as well as executive and management teams.	••	•	•	••	••	•	•	•	•

7.2. Subcategory Implementation Considerations

This section consists of implementation considerations drawn directly from the discussions that produced the Subcategory priorities shown in the tables of <u>Sec. 7.1</u>. Implementation considerations share participant expertise and guidance offered during the workshops on some CSF Subcategories.

Concurrent with the development of this LNG Profile, NIST published an initial public draft of *NIST SP 800-82 Rev. 3, Guide to Operational Technology (OT) Security* [15]. The initial draft of NIST SP 800-82 Rev. 3 highlights **OT-Specific Recommendations and Guidance** for each Subcategory. Users of this profile may find it useful to reference NIST SP 800-82 Rev. 3 to identify additional OT implementation considerations.

Table 44. Implementation Considerations for Mission Objective-1: Maintain Safe and Secure Operations.

Subcategories	Implementation Considerations
ID.AM-1, 2, 3	To manage risks to the organization, it must be understood what physical and software assets are present, what data exists on or is output from relevant systems, and who is involved in data handling and communications. In terms of priority, these controls are to be addressed sequentially.
PR.AC-7	Users may be required to authenticate, but most OT industrial control systems do not support multi-factor authentication (MFA) for all devices or assets. However, authentication is important to maintaining safe and secure LNG operations, so this control is high priority to push vendors and industry in the direction of supporting authentication measures (e.g., MFA, zero trust architecture).
	Management of credentials for OT devices may be simplified through implementation of a password vault for privileged access management (PAM) solution. The security of OT assets may be diminished if credentials are easily accessed by those with physical access to devices, such as credentials taped to a chassis or cabinet. Where possible, shared accounts should be transitioned to individual accounts or managed through a PAM solution. Default credentials and manufacturer service account credentials should be changed or deactivated wherever possible.
PR.IP-3	Maintaining secure and tested backups is an essential part of maintaining the environment and ensuring its continued availability in case of data loss or system disruption. Using a solution that enables backups to be fully offline or immutable helps ensure backups will be available when needed. In achieving this mission objective, organizations should consider ensuring control of what, when, and how something has changed within their environment.
DE.CM-1, 2, 4, 6,	Continuous monitoring supports identification of cybersecurity incidents by analyzing data from IT assets, OT assets, and assets monitoring the physical environment. Alerts or information indicating potential incidents may come from several sources such as, security information and event management (SIEM) systems, intrusion detection systems, intrusion prevention systems, user and entity behavioral analytics systems, and endpoint detection and response systems. Many assets within an operational environment may be monitored by external vendors who may also serve as a source of information about potential cybersecurity incidents.

Subcategories	Implementation Considerations
DE.CM-8	Vulnerability scanning of OT systems requires special consideration. Traditional IT scanning
	methods could potentially disrupt the operation of an OT component. There are additional
	vulnerability identification methods for OT equipment that can be employed such as review
	of vendor or manufacturer updates.
RS.RP-1	Response plans may incorporate scenarios that could be hazardous for responders and
	incorporate appropriate human safety precautions to address those potential events. The
	effectiveness of response plans may be improved through training and tested through
	exercises of the plans.
RC.IM-1	Adverse events in the LNG industry may have significant impacts to the environment,
	economic security, and human safety. Holding lessons learned sessions following an
	adverse event can help an organization identify and control the causal factors of adverse
	events and improve response actions if such an event occurs.
RC.CO-3	Effectively responding to an adverse event requires coordination across multiple
	organizational functions (e.g., engineering, operations, legal, and public relations) and
	potentially external stakeholders (e.g., government agencies, law enforcement, response
	vendors, and insurers). Developing a communications playbook with scripted responses
	that are preapproved by appropriate stakeholders, such as legal and management, for
	various incident types may enable faster and more effective communication during incident
	response and recovery.

Table 45. Considerations for Mission Objective-2: Ensure Operational Integrity of Plant Systems and Processes.

Subcategories	Considerations
ID.AM-5	Prioritizing resources based on classification, criticality, and business value is crucial to executive-level risk management decisions, such as where to allocate funding to remediate security gaps. This subcategory also aligns with ISA/IEC 62443 guidelines of organizing your systems by priority and impact for assessment.
ID.AM-6	Operators often do not have direct physical access to components deployed at LNG facilities due to the remote location of the components. Therefore, they often connect to these systems remotely. Remote access is a common threat vector for cyber-attacks and therefore it's important to carefully control remote access and stipulate how any third-party remote access would be managed, configured, and secured. The LNG industry relies heavily on partners for remote monitoring and diagnostics. There are explicit cybersecurity requirements built into some equipment agreements that stem from industry memorandums of agreements that need to be taken into account for access management. Applying security controls to third-party access, such as time limits, activity monitoring, and client initiation of remote access sessions, may help limit cybersecurity risk associated with third parties.
PR.IP-1	Change control processes help to reduce the probability that changes to assets will cause an adverse operational event. Additionally, requirements for safe and efficient operations may be met by implementing configuration baselines that align with operational integrity requirements and a process to manage the configuration and deployment of assets. Organizations may consider the use of technologies, such as a Configuration Management Data Base (CMDB) to help track and manage changes throughout the asset lifecycle.

Subcategories	Considerations
DE.CM-8	Vulnerability scans should not be run in an OT environment (unless their impact is fully understood). Passive scans may be feasible. Additionally, a lab environment that simulates the OT environment may enable more in-depth vulnerability scanning, testing, and vendor technology evaluation. For IT infrastructure, achieving the outcome of this subcategory may be required for threat management and continuous monitoring.
RS.AN-4	Development of thresholds for categorization of adverse events will be influenced by the unique operational needs of LNG processes and require input from a diverse set of stakeholders from across the organization, including operations, legal, and compliance team members.
RS.CO-1	Ensuring operational integrity of plant systems and process following a cybersecurity incident may necessitate operational shutdowns and a longer recovery for LNG systems. Communication may help to alleviate public concern that shutdowns were caused by threat actors and not by normal safety precautions during recovery. Developing a communications playbook with scripted responses that are preapproved by appropriate stakeholders, such as legal and management, for various incident types may enable more effective communication during incident response and recovery.

Table 46. Considerations for Mission Objective-3: Control Operational and Enterprise Security and Access.

Subcategories	Considerations
ID.AM-3	LNG operations and supporting business functions may, over time, develop interdependencies across IT and OT systems. Mapping the communication and data flows of IT and OT processes can help to identify interdependent systems by highlighting systems whose day-to-day operations require communications across systems. Business functions may require information from OT processes to facilitate business transactions, such as trading, buying and selling, and bulletin boards.
PR.AC-6	LNG operation control rooms are staffed and managed by multiple operators. Control room operators should have unique identities that are proofed and bound to credentials. Implementing unique identities and credentials may present a number of challenges, including legacy systems that do not support individual identities or credentials. Over time, as new technologies are adopted, such as those supporting zero trust architecture and two-factor authentication, these challenges may be addressed.
	The security of OT assets may be diminished if credentials are easily accessed by those with physical access to devices, such as credentials taped to a chassis or cabinet. Where possible, shared accounts should be transitioned to individual accounts or managed through a PAM solution. Default credentials and manufacturer service account credentials should be changed or deactivated wherever possible.

Subcategories	Considerations
PR.DS-6	Integrity checking mechanisms may be built into IT and OT systems. Verification activities may include procedures or technical methods to validate the integrity of software, firmware, hardware, etc. This subcategory was scored as medium priority because it may not be possible to conduct integrity checks on an active or running system; however, it is important to commit to integrity checking prior to commissioning a new system. This may be accomplished through hash validation of software and firmware. Organizations may request that vendors provide software and code that that has been signed to enable validation of integrity. Many safety systems for LNG have integrity checking for safety systems and basic process control systems.
PR.IP-10, 11	Provisioning accounts in advance for personnel and third parties that will be involved in incident response efforts may expedite the organization's recovery and return to normal operations. Cybersecurity should be included in relevant human resources practices such as
	personnel screening and personnel separation. Participants noted that there may be limitations on the types of personnel screening an organization can conduct. Organizations should determine which roles and responsibilities require recurring background checks and what investigation criteria are required. Background investigation criteria should align with regulatory and legal requirements and define appropriate checks for roles that present higher risk to the organization. These criteria may include review of criminal history records, credit reports, educational history, or past employment. If the performance of background checks is outsourced to a third party, organizations should ensure that investigation criteria meet or exceed those defined by the organization (e.g., verification of educational history and prior residence information).
DE.CM-8	Scans should be conducted when OT equipment is first acquired and during planned downtimes. Vulnerability scanning of OT systems requires special consideration since traditional IT scanning methods could potentially disrupt the operation of an OT component. Additionally, a lab environment that simulates the OT environment may enable more in-depth vulnerability scanning, testing, and vendor technology evaluation.
	Organizations should consider identifying appropriate vulnerability information sources that can be monitored to learn about vulnerabilities that may impact the organization's OT environment. Potential sources of information include manufacturers, vendors, public disclosures, or government vulnerability reporting (e.g., Industrial Control Systems Cyber Emergency Response Team (ICS-CERT), CISA Known Exploited Vulnerabilities Catalog).
RS.AN-1	Physical and logical access systems may generate a high volume of alerts that require investigation. Alerts related to critical assets may be prioritized above those related to non-critical assets to improve response times for assets that are most impactful to the organization. Additionally, organizations may adjust monitoring systems to reduce false positives and limit unnecessary investigations. For example, advances in video camera technology, such as object recognition that can alert on specific objects, specific portions of the camera's field of view, or only during specific times may help reduce false positive alerts.

Subcategories	Considerations
RC.RP-1	Organizations should consider planning in advance for securing adequate support in the event of a significant cyber incident. This may include vendor support and coordination within the Oil and Natural Gas Information Sharing and Analysis Center. Organizations may also consider developing formal cyber mutual assistance agreements with peers in industry that may have similar operating environments. Additionally, government resources may be available, such as the Federal Bureau of Investigation, National Guard Cyber Protection Teams, and local law enforcement.
	Ensuring support is available when needed may require establishing agreements and other coordination in advance of an incident. For example, engaging with National Guard Cyber Protection Teams may require signed agreements and coordination with the state governor's office to be established in advance of an incident. Additionally, incident response and recovery resources may require physical and logical access to organizational assets. It may help to expedite these activities if access is provisioned in advance.

Table 47. Considerations for Mission Objective-4: Monitor, Detect, and Respond to Anomalous Behavior.

Subcategories	Considerations
ID.AM-1, 2, 3, 4	Regarding priority, these subcategories should be addressed in a sequential manner. An organization must have an inventory of its assets (physical devices, systems, and software). After developing an asset inventory, organizations will be able to map how inventoried assets communicate.
PR.IP-1	Implementation of asset configuration baselines and strong change management may help to support detection of changes to asset configurations. Organizations may consider the use of technologies, such as a CMDB to help track and manage changes throughout the asset lifecycle.
DE.AE-5	Development of baselines based on normal activity across the operating environment is critical for anomaly detection. Additionally, organizations may consider whether baselines should be developed for different stages of plant operation (e.g., startup, run, shutdown). Organizations may also consider developing incident declaration thresholds based on an understanding of normal activity and abnormal behavior that could cause operational disruptions.
RS.MI-1, 2	Organizations should establish and maintain adequate monitoring capabilities to enable the detection of anomalous behavior that may indicate the occurrence of an incident. Early detection of incidents is a high priority for LNG operations to help prevent operational disruptions. Additionally, conducting exercises and testing established incident response processes will help organizations to improve confidence in the effectiveness of response capabilities. This may include tabletop, functional, or full-scale exercises. Testing processes to transition to manual operations, testing processes to separate IT and OT networks, and trial runs of response processes to validate procedures (e.g., testing physical access, testing call trees, testing backups).
RS.MI-3	Accepting risks is a medium priority, because an organization may only be able to address high-priority vulnerabilities due to the nature of OT. Organizations may not be able to roll out a patch, update, or fix known issues until the next shutdown or maintenance window.

Subcategories	Considerations
RC.CO-3	Effective communications are important in the response to anomalous behavior. In
	LNG operations, there may be multiple business units and similar systems, regardless
	of whether they operate differently. There are often external stakeholders from the
	pipelines that require PLC-to-PLC communication or raw materials which may be
	sourced from different organizations. These pipeline and LNG partners should receive
	alerts when anomalous events are detected.

Table 48. Considerations for Mission Objective-5: Safeguard the Environment.

Subcategories	Considerations
ID.GV-3	Internal policy should reflect regulatory requirements to ensure that environmental protections are in place.
PR.DS-1, 2, 4, 5	Organizations should implement controls that meet defined safety, confidentiality, integrity, and availability requirements.
PR.MA-2	The industry is experiencing an increase in remote access utilization; for example, field service engineers remotely accessing platforms. Thus, controls and authorization processes need to be implemented to protect systems if those controls are not already in place.
DE.AE-3	A common problem related to collecting event data at LNG facilities is a lack of devices capable of producing logs or hosting agents, operational requirements that prohibit additional log traffic on networks, and devices that log very few events. This complicates collecting adequate log data. Where data is available, a SIEM can correlate disparate sensor information, and provide additional insight into cyber events. Effectively implementing a SIEM requires adequate staff to analyze the collected data, sufficient storage, and security controls to segment and protect the SIEM, log data, and sensors. Additional data sources that organizations may find useful include application, server, and workstation logs; security protection device logs; NetFlow and IP Flow Information Export (IPFIX) data; Simple Network Management Protocol (SNMP) traps; and full packet capture (PCAP). It is worth
	considering that some data sources may require additional storage (e.g., PCAP generally generates more data than NetFlow).
DE.AE-4	Identifying attack vectors and determining impact is important in order to put the correct protections in place and prioritize incoming alerts.
RS.AN-5	Due to operational or technical limitations, automated vulnerability identification through scanning tools may not be possible for some assets making manual review of vulnerability notifications necessary. Vulnerability information sources may include vendor disclosures, public vulnerability disclosures, and government vulnerability reporting (e.g., Industrial Control Systems Cyber Emergency Response Team (ICS-CERT), CISA Known Exploited Vulnerabilities Catalog). Additionally, organizations should consider if coordination with vendors will be necessary when mitigating a vulnerability. When analyzing vulnerabilities, organizations should consider their unique operating environment and mitigating controls to determine the potential impact of a vulnerability.

Subcategories	Considerations
RC.CO-1, 2, 3	In a mixed architecture environment, when environmental incidents occur, timely
	communication is important so that both the industry and its partners can quickly
	implement mitigation and recovery actions. Without effective communication, the
	organization may be potentially liable for inaction.
RC.RP-1	The timeliness of recovery requires a readily executable plan. The longer it takes to
	recover from an incident, the higher the potential impact for the environment and the
	organization. Organizations may increase the efficiency and predictability of recovery
	activities by performing periodic exercises and testing recovery plans.

Table 49. Considerations for Mission Objective-6: Define Policy and Governance Actions that Capture/Protect the Mission.

Subcategories	Considerations
ID.GV-1	Establishing policies for cybersecurity-related activities that align with organizational goals and objectives will help ensure that these activities fulfill the organization's mission, and they align with the organization's most-valued behaviors. Policies also enable organizations to assign responsibility for cybersecurity activities to specific roles and build procedures that help the organization to meet legal and regulatory requirements.
PR.AT-1	All users (e.g., IT traditional roles and users, operators) should be informed and trained in cybersecurity risks and measures related to LNG operations and technology.
PR.IP-8	Internal sharing can be used to revise processes and reduce cost and risk as improvements are made.
DE.CM-1, 8	In both the IT and OT environments, scanning of systems and networks should be defined by policy including caveats based on feasibility. With these policies in place, employees can refer to them and know what actions to take for each system. IT or OT policy should define acceptable testing methods and may incorporate alternatives to actively scanning systems, such as development of a lab environment.
RS.CO-3, 4	It may be necessary to notify external parties upon declaration of an incident to comply with legal or regulatory requirements. Incident response plans should document the stakeholders that must be notified, information that must be shared, and roles responsible for communications. Developing a communications playbook with scripted responses that are preapproved by appropriate stakeholders, such as legal and management, for various incident types may enable faster and more effective communication during incident response and recovery.
RC.RP-1	An incident may cause operational disruption, but recovery plans will help ensure that an organization can still meet its mission. Advanced planning and development of recovery plans will identify the resources necessary for reconstitution, describe activities necessary for restoring operations, and assign responsibility for key roles. Periodic testing and updates of response plans based on lessons learned can help ensure the relevance and effectiveness of response procedures.

Table 50. Considerations for Mission Objective-7: Maintain Regulatory Compliance.

Subcategories	Considerations
ID.RA-3	Examples of threats for consideration: script kiddies, dedicated hackers, nation-states,
	cyber-criminals, insider threats (both malicious and accidental).
ID.RA-4	Traditionally, the likelihood has been easier to measure in spaces that provide concrete
	numeric data, such as equipment failure rates. Likelihood for cybersecurity risks can be
	more difficult to estimate.
PR.AT-1	Cybersecurity awareness activities can be used to notify employees of regulatory
	compliance requirements, communicate expected behavior, and improve employee
	understanding of cyber risks.
DE.CM-1, 2, 4, 5	These controls are high and medium priority due to the regulations in place for the
	physical environment or facility of LNG operations. There may be third parties that have
	remote access to the technology, so network monitoring is a priority. There has been
	increasing tablet presence and cellphone connectivity to industrial control systems in
	general as well as within the LNG sector. Additionally, there may be cell modem
	connectivity into regulatory systems. Hence, the two-dot consideration for DE.CM-5.
DE.CM-8	Certain older devices may not support vulnerability scanning due to the inherent
	limitations of the technology. Organizations may utilize alternative methods to test
	devices and identify vulnerabilities. For example, passive vulnerability scanning could be
	used to collect information on devices in the operational environment without active
	interaction with these operational devices. Information collected from passive scanning
	may help organizations to meet regulatory requirements regarding vulnerability
	identification or asset discovery.
RS.CO-2, 3	Incident response plans should be developed to help organizations meet regulatory
	requirements, including deadlines for reporting an incident, stakeholders that must
	receive notification, and reporting requirements.
RC.CO-3	Similar to incident reporting, necessary regulatory reporting related to recovery activities
	should be built into response plans.

Table 51. Considerations for Mission Objective-8: Continuously Optimize and Maintain Current Operational State by Establishing Baselines and Measures.

Subcategories	Considerations
ID.SC-1	Suppliers and third parties can introduce risk that might reduce an organization's ability to maintain a desired operational state. Cyber supply chain risk management processes may be integrated with an enterprise-level risk management program or may be operated separately but provide inputs to an enterprise-level risk management program.
PR.DS-4	Development of plans to elevate the organization's actual state to a desired state should consider additional resources that might be necessary to achieve business goals and maintain availability of operational processes.
DE.AE-3	Collecting data from multiple sources in an environment and for a variety of events helps to establish the baseline for what is occurring in the environment. These baselines can then be used to distinguish attacks or incidents from false positives.
DE.CM-2	Certain types of equipment cannot reliably be detected through the network, or they require manual discovery, monitoring, and control. In cases where cybersecurity controls

Subcategories	Considerations
	are not feasible, a physical access control may be applied as a mitigating measure to
	protect operational equipment.
DE.CM-5	In the future, if the ability to connect wirelessly to sensors continues to grow, this
	subcategory will become an increasingly significant concern to the OT cybersecurity
	professionals tasked with maintaining the secure operation of these systems.
DE.CM-8	Organizations may utilize alternative methods to test devices and identify vulnerabilities.
	For example, passive vulnerability scanning could be used to collect information on
	devices in the operational environment without active interaction with these operational
	devices. Regularly performing vulnerability identification can provide improved insight
	into the current state of the operating environment and serve as an input to continuous
	improvement.
RS.RP-1	Implementation of additional capabilities to reach a desired state should also drive
	updates to incident response plans to ensure they still align with production equipment
	and processes. Organizations should consider storing offline copies of important
	response documentation, such as incident response plans.
	Organizations should consider including information important to restoration in incident
	response and recovery plans, such as network diagrams, critical system dependencies,
	recovery time objectives (RTOs), and priority order of restoration for systems.
	Organizations with separate, redundant datacenters should consider whether sufficient
	bandwidth is available to meet restoration requirements in the event of a large-scale
	disaster recovery effort (e.g., moving multiple critical system images in parallel in order
	to begin recovery).
RC.RP-1	As organizations progress to a desired state, updates to recovery plans may be necessary
	to address new processes or capabilities. Additionally, lessons learned from exercises
	should drive updates to recovery plans and associated procedures.

Table 52. Considerations for Mission Objective-9: Validate and Optimize Supply Chain.

Subcategories	Considerations
ID.AM-1, 2	Organizations may place a higher priority on ID.AM-2 for externally facing systems as attackers commonly exploit vulnerabilities in software, such as content delivery applications, email servers, collaboration platforms, or online databases. Additionally, when building an asset inventory, organizations should ensure that all assets that could impact operations are considered for inclusion in the inventory. This includes assets that are sometimes overlooked, but may contribute to cybersecurity risk, such as servers that use out-of-band management protocols (e.g., Intelligent Platform Management Interface (IPMI)), printers, and backup modems.)
ID.AM-4	Organizations may have functions that are supported by third parties, such as alternative facility power sources. These external systems can have direct connections into site systems, which puts them at risk for attack if the third party is compromised. It is important to understand which systems have external connections so that they can be monitored.

Subcategories	Considerations
ID.SC-3	Contracts with suppliers and third parties provide legal protections in case of an incident. Many companies rely on the third party's ability to deliver cyber controls and cybersecurity capabilities within the context of that contract. A weak contract puts companies at risk from cybersecurity, reputational, legal, and financial perspectives. Organizations should consider the cybersecurity capabilities of third parties during selection and relationship formation. Contractual requirements to mitigate risks arising from third parties may include documented incident response plans, evidence that incident response plans are tested, and performance of specified cybersecurity assessments.
PR.IP-2	In the OT environment, it may be more difficult to manage the software development lifecycle, as it is largely controlled by the vendor.
PR.IP-12	Development and implementation of a vulnerability management plan should consider vulnerabilities that may be introduced through the organization's supply chain. Vulnerability sources may include vendors, suppliers, service providers, and open-source code repositories. Verifying the integrity of software, patches, and firmware from vendors through the validation of hashes and requiring vendors to provide signed code may help mitigate the risk of vulnerabilities being introduced through the organization's supply chain.
DE.CM-8	Vulnerability scanning and endpoint detection may require an agent to first be implemented on each in-scope asset. Adding an agent could void the vendor warranty, and an organization may value keeping the warranty over the benefits of setting up scanning for some of its OT components. Alternatively, development of a lab environment may enable vulnerability scanning and endpoint monitoring where it may not otherwise be feasible.
RS.RP-1	Incident response plans should include scenarios related to incidents that stem from supply chain vulnerabilities, such as an application that introduces a vulnerability into the operational environment or a service provider that suffers from a breach. Where applicable, incident response plans should incorporate vendors, government agencies, and law enforcement that may be involved in response efforts and be exercised periodically to ensure the effectiveness of collaboration processes.
RC.RP-1	Recovery activities that may require coordination with third parties should be documented in recovery plans, as well as contractual agreements with third parties. Additionally, selection criteria for incident response and recovery service providers should include past experience with environments similar to the organization's operational environment.

To summarize, the tables here in <u>Sec. 7.2</u> share participant expertise and guidance offered during the workshops on some CSF Subcategories. The tables in <u>Sec. 7.1</u> capture the relative importance of each CSF Subcategory to each mission objective.

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Appendix A. List of Symbols, Abbreviations, and Acronyms

Selected acronyms and abbreviations used in this document are defined below.

BOG

Boil-Off Gas

CESER

Office of Cybersecurity, Energy Security, and Emergency Response

CSF

Cybersecurity Framework

ICS

Industrial Control Systems

IT

Information Technology

LNG

Liquefied Natural Gas

MFA

Multi-Factor Authentication

MTS

Marine Transportation System

NCCoE

National Cybersecurity Center of Excellence

NIST

National Institute of Standards and Technology

OT

Operational Technology

PLC

Programmable Logic Controller

Appendix B. Glossary

Source: NIST Computer Security Resource Center Glossary

Category

The subdivision of a Function into groups of cybersecurity outcomes closely tied to programmatic needs and particular activities.

Framework

The Cybersecurity Framework was developed for defining protection of critical infrastructure. It provides a common language for understanding, managing, and expressing cybersecurity risk both internally and externally. Includes activities to achieve specific cybersecurity outcomes, and references examples of guidance to achieve those outcomes.

Function

Primary unit within the Cybersecurity Framework. Exhibits basic cybersecurity activities at their highest level.

Mission Objective

A high-level goal that must be achieved for an organization to succeed at its primary mission or purpose.

Profile

A representation of the outcomes that a particular system or organization has selected from the CSF Categories and Subcategories.

Subcategory

The subdivision of a Category into specific outcomes of technical and/or management activities. Examples of Subcategories include "External information systems are cataloged," "Data-at-rest is protected," and "Notifications from detection systems are investigated."

Appendix C. Change Log

In September 2023, the following changes were made in the first update of this report:

 Section 7.1 – Reintegrated table information on priorities for the subcategories within the Identify Function's Risk Management category as Table 25. The information in this table appeared in Table 13 of the <u>initial public draft</u> of this report but was omitted from the final version.