

GE Vernova Gas Power M&D NERC Section 800 Information Request Response

GE Vernova Gas Power M&D, a subsidiary of GE Vernova, is not a NERC registered entity, nor is it required to be register at this time. GE Vernova and its subsidiaries provide products and services that contribute to our customers compliance programs. NERC has issued Section 800 data request to assess the extent of cross-border operation control of Bulk Power System Elements.

Over the past year, NERC has identified instances of cross-border operation or control of bulk power system elements. Technological advancements, which were previously not available, have enabled dispersed management systems used by distributed energy resource aggregators, Internet-of-Things devices and outage management systems and have increased automation/integration of operational technology networks, increasing the opportunity for cross-border operations.

NERC developed a Section 800 data request that would enable NERC to identify the extent to which non-U.S. entities have the ability to operate or control U.S. bulk power system assets. Those cross-border operations would include activities stemming from Canada and Mexico, as well as outside of North America.

This data request, which was discussed at the recent Reliability Steering Technical Committee meeting, will allow NERC to assess the extent of risk and begin to evaluate potential next steps. The Section 800 data request is expected to be issued this fall.

Below are questions as they relate to Section 800 Data Request and answers aligning with the request, as it applies to GE Vernova Gas Power M&D.

Q1. Does the entity authorize remote access to BPS Elements on the U.S. grid (i.e., communicating through an external, non-organization-controlled network)?

A1. Yes, GE Vernova Gas Power M&D Tuners have been granted remote access by customers, based on contractual obligations.

Q2. If yes, does remote access require Multifactor Authentication?

A2. Multifactor Authentication is not required. However, in addition to limiting access to authorized personnel on the GE Vernova corporate network, a Tuner must use the dedicated tuning server JumpBoxes (Intermediate System) where access is only permitted by SSO authentication. Authorized users must then connect to the customer's HMI through a Lockbox which is an air-gapped firewall which is fully owned and managed by the customer.

Q3. Can an employee residing outside of NAM have the capabilities to remote to the customers assets?

A3. Yes. However, all tuners must use the tuning server JumpBoxes located in Alpharetta, Georgia USA to connect to a customer site. Connection to a customer site cannot be made directly from such employees computers.

Q4. Who controls remote access authorization?

A4. Remote access permissions have 2 parts.

- a. Access to the tuning server located in the US which is controlled by the tuning team*
- b. Access to the site HMI which is controlled by the customer by turning on or off the Lockbox*

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Q5. What is remote access used for (operational control, monitoring, maintenance)

A5. Remote access can be used for different purposes. GE Vernova may have different contractual obligations in place to monitor, control, maintain, engineer and/or troubleshoot/support. Every customer can reach out to the respective Customer Support Representative to get more specific information.

Q6. Is remote access to BPS Elements restricted to internal users (i.e., only members of the reporting entity itself or members of the same corporate family)?

A6. Remote access to customer BPS Elements is limited to GE Vernova Employees and GE Vernova Contractors. All employees and contractors must meet compliance requirements, including an active PRA and required annual CIP training. Access reviews are completed annually at a minimum. GE Vernova Ops Compliance Team notifies customers when remote access should no longer be granted, coordination of controls for GE Vernova BU – Interactive Remote Access, and system-to-system Remote Access.

Q7. Does your organization have an international presence (e.g., affiliates / subsidiaries in another country; corporate headquarters outside the U.S.)?

A7. GE Vernova is a global organization with teams collaborating all over the world. Therefore, GE Vernova and its subsidiaries may send, process, and/or store information outside the United States as permitted by the regulatory requirements and subject to any contractual terms that are applicable. When a customer requires specific restrictions on data storage and transfer, including restrictions on location and personnel, the commercial engagement team is consulted as to whether such restrictions can be included in the contract subject to local regulations. The GE Vernova Ops Compliance Team is responsible for ensuring all regulatory compliance requirements are implemented as outlined in service contracts.

Based on our current understanding, GE Vernova Gas Power M&D affirms the accuracy of the above statement. GE Vernova Gas Power M&D is committed to ensuring the safety, security, integrity, and regulatory compliance of our products. Contact your local GE Vernova Services representative for assistance or for additional information.