Good morning Mr. Chairman and Commissioners,

Item E-2 is a draft order that approves Reliability Standard CIP-008-6 (Cyber Security - Incident Reporting and Response Planning). The North American Electric Reliability Corporation (NERC) developed and submitted the proposed Reliability Standard in response to Commission directives in Order No. 848. In Order No. 848, the Commission determined that current cyber reporting requirements may underestimate the true number of cyber security events on the Bulk-Power System. The Commission based that conclusion on the fact that responsible entities are currently only required to report events that compromised or disrupted one or more reliability tasks—but are not required to report any attempts to compromise BES cyber systems. To address this gap, Order No. 848 directed NERC to enhance the mandatory cyber incident reporting requirements to include incidents that compromise, or attempt to compromise, a responsible entity’s Electronic Security Perimeter or associated Electronic Access Control or Monitoring Systems. In addition, Order No. 848 provided that the cyber incident reports should contain certain baseline information to improve the quality of reporting and allow for ease of comparison between reports, and should also specify deadlines for completing reports and who should receive the reports following an event.

In conjunction with changes to the definitions of Cyber Security Incident and Reportable Cyber Security Incident, the proposed Reliability Standard CIP-008-6 addresses Order No. 848 by expanding reporting requirements to include compromises or attempts to compromise Electronic Security Perimeters, Electronic Access Control or Monitoring Systems, and Physical Security Perimeters associated with high and medium impact BES Cyber Systems as well as disruptions or attempts to disrupt the operation of BES Cyber Systems. Once an event is identified under the broadened event definitions, a responsible entity must comply with other provisions of the proposed Reliability Standard, including initiating a response plan and reporting the incident to the Electricity Information Sharing and Analysis Center and the
Department of Homeland Security’s National Cybersecurity and Communications Integration Center.

Mandating the reporting of cyber events involving attempts to compromise BES Cyber Systems and specifying the minimum content, dissemination, and filing deadlines for such reports will enhance the reliability of the Bulk-Power System by providing a more accurate picture of the rapidly changing cyber threat landscape.

That concludes our presentation. We would be happy to answer any questions.