



Edison Electric  
INSTITUTE

*Power by Association*

## **NERC 2019 Draft Business Plan and Budget Initial Comments of the Edison Electric Institute June 29, 2018**

On behalf of our member companies, the Edison Electric Institute (“EEI”) appreciates the opportunity to provide comments on the first draft of NERC’s 2019 Business Plan and Budget (“Budget”). With the continued upward trend on the annual NERC budget, EEI supports NERC’s efforts to improve the effectiveness and efficiency of the ERO Enterprise and NERC stakeholder committee engagement.

EEI supports NERC’s investment in the E-ISAC. The execution of the E-ISAC’s Long-term Strategic Plan for building a world class ISAC is critical for providing timely sharing of security threat information.

EEI offers the following comments:

### **SAFNR**

The Budget proposes a \$600,000 expense to enhance the functionality of the SAFNR tool. EEI encourages NERC to develop a business case and specification document for the SAFNR tool to (1) get an accurate estimate for the work and (2) show how the data is used to inform decisions and actions of NERC, E-ISAC, and the Regional Entities. Additionally, we recommend that NERC collaborate with DOE, FERC, and others as appropriate to leverage existing capabilities and resources as well as to prevent duplication of efforts to enhance situational awareness capabilities and tools.

### **CMEP Technology Project**

EEI supports the development and implementation of a common CMEP tool to improve the productivity and effectiveness of the ERO Enterprise. We encourage NERC to (1) continue prioritizing the protection and security of confidential information and sensitive, critical infrastructure information and (2) continue engaging with stakeholders, including the Compliance and Certification Committee, to solicit feedback throughout the process.

### **Medical Expenses**

With an estimated increase of 7.5% for medical expenses, EEI encourages NERC to continue benchmarking with industry and other similar organizations to look for additional opportunities to reduce medical expense increases and more closely align with average rate increases for the industry.

**Office Rent**

The Atlanta office expansion will provide additional meeting space and should result in a reduction in future meeting expenses. EEI respectfully requests additional clarity on the savings that will occur with the addition of the new space.

EEI appreciates NERC's consideration of these comments and recommendations.