

Proposed Revisions to Section 1003 of the NERC Rules of Procedure

Infrastructure Security Program

Introduction

The North American Electric Reliability Corporation (“NERC”) is proposing revisions to section 1003 of its Rules or Procedure (“ROP”) in accordance with the directive in the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) Order on Compliance Filings related to NERC’s Five Year Performance Assessment.¹ Section 1003 of the ROP describes NERC’s infrastructure security program, including, among other things, its operation of the Electricity Information Sharing and Analysis Center (“E-ISAC”). Consistent with the Commission’s directive, the proposed revision modifies section 1003 to require NERC to share with the Commission any All Points Bulletins (“APBs”) issued by the E-ISAC.

Background

The E-ISAC’s use of APBs is part of its Critical Broadcast Program (“CBP”). The purpose of the CBP is to provide for the rapid dissemination of critical security information to electricity sector asset owners and operators as security threats and attacks develop, and critical, time-sensitive security information becomes available. Cyber and physical security threats and attacks develop quickly. To respond to these events, the CBP provides an established approach for sharing time-sensitive information with electricity sector asset owners and operators to help them prevent an imminent cyber or physical attack on the grid, reduce the scope of a successful attack, or implement ongoing measures to defend against an attack. The CBP leverages E-ISAC staff and stakeholder expertise to obtain and disseminate the best-available information and potential mitigation strategies to address developing security threats and events in a timely manner. A CBP communication could take the form of a conference call or webinar with relevant entities or the issuance of a written document, referred to as an APB, posted on the E-ISAC portal or disseminated through other channels as deemed appropriate by the E-ISAC given the facts and circumstances presented.

NERC’s current practice is to share APBs with Commission staff, via the E-ISAC portal or encrypted emails, to provide Commission staff appropriate situational awareness. In its Order on Compliance Filings, the Commission directed NERC to modify its ROP to require NERC to share all APBs with the Commission no later than at the time of issuance.

Proposed Modification

In compliance with the Commission’s directive, NERC proposes to add the following in Section 1003:

¹ *Order on Compliance Filings*, 174 FERC ¶ 61,030 (2021).

As part of the E-ISAC's efforts to fulfill its mission, it may issue, as circumstances warrant, written communications, referred to as All Points Bulletins ("APBs"), to disseminate critical security information rapidly to electricity sector asset owners and operators as security threats and attacks develop, and critical, time-sensitive security information becomes available. The E-ISAC shall share all APBs with Federal Energy Regulatory Commission staff no later than at the time of issuance.