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2 **Northwest Public Power Association**

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4 **Proposed Resolution 10-09**

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6 **In Support of Limited Additional Federal Authority to Protect the Bulk**
7 **Power System from Cyber Attacks**
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9 The Northwest Public Power Association (NWPPA) supports protecting its
10 infrastructure from cyber attacks.

11 In 2007, the North American Electric Reliability Council (NERC), acting
12 as the Electricity Sector Information Sharing and Analysis Center (ES-ISAC) for
13 the U.S. Department of Homeland Security (DHS), distributed a cyber-
14 vulnerability alert developed by DHS to selected entities in the electric power
15 sector. The DHS “Aurora” alert was not subject to mandatory compliance under
16 Federal Power Act (FPA) Section 215, which mandates reliability standards for
17 certain electric utilities. The alert was intended to caution the industry to
18 secure remotely accessible transmission relays and other devices from cyber
19 attack, based on simulations conducted at Idaho National Lab that
20 demonstrated that remote access to bulk power system (BPS) relays could be
21 used to damage rotating machines—such as generators, pumps or motors—
22 that are connected to the power grid. Industry voluntarily complied with the
23 alert.

24 Following the release of the DHS Aurora alert, in 2008 Congress
25 conducted hearings to consider the Federal Energy Regulatory Commission’s
26 (FERC), NERC’s and industry’s response to the alert and other related issues.
27 FERC’s Chair argued at a congressional hearing that the Commission needs
28 additional authority, to supplement FPA Section 215, authorizing FERC to
29 impose interim reliability standards on an emergency basis when national
30 security or intelligence agencies identify an imminent cyber threat to the bulk-
31 power system. NERC’s CEO agreed. Many in Congress also agreed, resulting in
32 draft House legislation giving FERC limited authority to direct the electric utility
33 industry to take certain steps in the event of a cyber-security emergency. The
34 Senate also drafted legislation that gave the Department of Energy a greater
35 role.

36 Because cyber security is critical to protecting utility infrastructure,
37 NWPPA urges Congress to consider only legislation that is narrowly crafted and
38 targeted to address the issues involving cyber security without placing an
39 unnecessary burden on the industry with only limited results. NWPPA opposes
40 legislation to grant FERC broader powers to develop and implement standards
41 during an emergency. However, NWPPA does support a method that relies on
42 industry developed actions that facilitate expedient identification and
43 understanding of electric system vulnerabilities, with standardized procedures
44 for disseminating information to utilities.

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46 NORTHWEST PUBLIC POWER ASSOCIATION

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48 Origination Date: 2009 (Modeled after draft APPA language) with SnoPUD edits