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State Regulators' Responsibilities Regarding Cybersecurity Issues

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Commission Responsibilities

Reliability and safety

Consumer protection

Cost recovery and just and reasonable rates



Cybersecurity Challenges

Jurisdiction

Liability

Technical knowledge

New technologies



Actions Taken

| Actions Taken | | |
|---------------|--------------------------------|---|
| State | Docket | Description |
| Arkansas | 10-109-U | Preapproval of AMI costs, required cybersecurity plan |
| California | 11-07-056 | Rules for access of private information, annual AMI reports |
| Connecticut | 10-11-08 | Cybersecurity questions |
| Maryland | 9207, 9208 | AMI deployment plans, annual cybersecurity briefings, cybersecurity auditing firm |
| Montana | D2013.12.85 | Cybersecurity questions |
| New Jersey | EO11090575 | Public safety and reliability, required incident reporting, confidential filing |
| New York | 02-M-0953 | Cybersecurity auditing firm, cybersecurity action plan |
| New York | 13-M-0178 | Required cybersecurity plan, annual reporting |
| Oregon | RE 17 | Cybersecurity questions |
| Pennsylvania | 52 Pa. Code §§101.1 et seq. | Required cybersecurity plan, annual reporting |
| Texas | §25.130 | Rules for access of private information, annual third party cybersecurity assessments |
| Washington | U-090222 | Annual AMI reports |



Ongoing Dockets

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|----------------------|--------------|--|
| State | Docket | Description |
| District of Columbia | FC1098 | Rules for access of private information |
| Indiana | 44319 | Confidential response to commission questions |
| Kentucky | 2012-00428 | AMI deployment plans |
| Louisiana | R-32702 | Public safety and reliability, cybersecurity questions |
| Massachusetts | D.P.U. 12-76 | AMI deployment plans |
| Missouri | EW-2013-0011 | Cybersecurity questions |
| New York | 14-M-0101 | AMI deployment plans |
| Rhode Island | 4075 | AMI deployment plans |
| South Carolina | 2014-416-E | NERC CIP recovery |
| Vermont | 7307 | AMI deployment plans, annual cybersecurity briefings |



Federal Agencies

• Presidents Clinton, Bush, Obama

- Department of Homeland Security
 - Transportation Security Administration
- Federal Energy Regulatory Commission
 - North American Electric Reliability Corporation



Federal Agencies

Nuclear Regulatory Commission

Federal Communications Commission

- National Institute of Standards and Technology
 - National Science Foundation



State Legislatures

Cybersecurity coordinators

Economic development

AMI deployment

Protection of personal information



Utility Organizations

- American Water Works Association
- American Gas Association
- American Petroleum Institute
- Edison Electric Institute
- Nuclear Energy Institute
- Utilities Telecom Council



Trends in Commission Action

System protection, reliability, and resiliency

AMI deployment

Basic cybersecurity training

Best practices and standards, frameworks

Confidential treatment of cybersecurity information