Northwest Public Power Association
Resolution 2019-03
Protecting the Bulk Electric System from Cyber and Physical Attacks

Background
NWPPA supports protecting electric infrastructure from cyber and physical attacks. In the Energy Policy Act of 2005, Congress authorized the creation of an electric reliability organization certified by the Federal Energy Regulatory Commission (FERC) and tasked with developing technical standards to ensure reliability – including cyber security – of the bulk electric system. The North American Electric Reliability Corporation (NERC) was certified by FERC to perform these duties.

Standards are developed through a NERC process that takes input from technical experts in all sectors of the North American utility industry and sends the standards to FERC where they are approved or remanded for modification. Once approved, they are mandatory and enforceable. Nuclear reactors are also subject to mandatory cyber standards required by the Nuclear Regulatory Commission (NRC). In recent years, Congress has become concerned that the North American electric grid is vulnerable to attack and has debated and enacted various legislative proposals to strengthen the security of the bulk electric system.

NWPPA’s Position

• NWPPA members are actively engaged in efforts to protect the electric grid from cyber and physical attacks to ensure a reliable and safe electrical system.
• NWPPA supports having a single federal agency authorized with limited, emergency power to address “imminent” cyber security threats to the Bulk Electric System.
• NWPPA also supports action by the federal government to provide utilities with timely, actionable information on threats that enable effective response.
• NWPPA opposes measures that would undermine the current NRC-required standards for nuclear reactors and the existing FERC/NERC process for developing cyber security standards—including measures that would give FERC authority to develop standards to address cyber vulnerabilities, that would give FERC authority over facilities beyond the Bulk Electric System, or that bypass the existing standards-setting process to address geomagnetic disturbances (GMD) or electromagnetic pulse (EMP) events.