

## **Anya Josephson**

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**From:** Dworzak, David <DDworzak@eei.org>  
**Sent:** Tuesday, July 29, 2014 4:15 PM  
**To:** Michael Walker  
**Cc:** Fama, Jim; Hindin, Barbara; Gray, Mark; Gust, Jeffery J; Naumann, Steven T:(BSC); Hitti, Nabil E. (US); Peeler, Nelson  
**Subject:** EEI comments / 2015 NERC business plan and budget

Mike;

On behalf of our member companies, the Edison Electric Institute (EEI) offers the following brief comments on the second draft NERC proposed 2015 business plan and budget.

As stated several weeks ago in earlier comments, EEI appreciates that NERC has responded positively to previous recommendations. NERC has demonstrated discipline around travel-related expenditures and shown willingness to limit staffing additions. Presentations and descriptions of the various programs and activities have improved significantly and it has become easier to review the numbers. We appreciate your leadership and management regarding these improvements. EEI envisions that budget discipline will assist in sharpening NERC management focus on core programs and activities, and continuing in a direction for a steady state for both the standards program, and the compliance and enforcement program.

One significant change has taken place in the current proposed draft budget, the addition of an addendum to address expenditures related to the ES-ISAC role in CRISP implementation. EEI believes that the funding mechanism shown in the 2015 business plan and budget is fair and reasonable. EEI notes that these costs are ES-ISAC costs, which include NERC overheads that NERC would otherwise incur and the majority of the costs of CRISP, i.e., the costs of the subcontract to PNNL, will be born solely by the CRISP participants. All stakeholders will benefit from the information that the ES-ISAC receives as the program lead for CRISP. All stakeholders will receive anonymous information on threats and mitigation in a much more timely manner than they would otherwise. As the cyber threats grown more sophisticated, more sophisticated tools are needed. The ES-ISAC needs to be able to gain expertise in these tools and the industry needs to receive the benefit of that information. The main purpose of the ES-ISAC is to analyze information and provide that information, including mitigation, to all industry users. Therefore, a sharing of the common expenses is reasonable.

Feel free to reply or call if you have any questions or need additional information.

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