

**National Rural Electric Cooperative Association (NRECA) Comments on  
Draft 1 of the 2015 NERC Business Plan and Budget  
June 30, 2014**

NRECA appreciates the opportunity to submit comments on Draft 1 of the 2015 NERC Business Plan and Budget. We recognize that NERC has taken significant steps to present a clearer and more transparent budget proposal for industry comment. NRECA's comments are limited to Electricity Sector Information Sharing and Analysis Center (ES-ISAC) issues.

- NRECA supports physical separation of the ES-ISAC from all other NERC departments and the reorganization that has the ES-ISAC reporting directly to the NERC CEO.
- NRECA supports NERC's proposed role to implement and utilize CRISP technology to increase industry's access to important grid security information that contributes to BES reliability. We also understand that if this proposal moves forward there will be additional budget impacts that have not yet been finalized.
- NRECA requests that the business plan and budget documents clearly state that all entities which have signed up for ES-ISAC portal access, not only NERC registered entities, will receive and have access to CRISP and other security information and analysis at no additional cost above the net energy for load assessment.
- NRECA supports transitioning the Cyber Risk Preparedness Assessments (CRPA) program to a self-assessment tool as proposed in the draft documents.
- NRECA requests that NERC clarify who is an ES-ISAC member. It is our understanding that an ES-ISAC member is any entity who signs up and is approved for ES-ISAC portal access.
- In the third line of the "Secure Bidirectional Communications" section, NRECA requests that "registered entities" be replaced with "ES-ISAC members" as NRECA understands the term in the previous bullet above.

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