



The Large Public Power Council

300 North Washington Street, Suite 405, Alexandria, VA 22314
703/740-1750 (phone) • 703/740-1770 (fax)
lppc@lppc.org (e-mail)

May 25, 2011

Members, Senate Committee on
Energy and Natural Resources
SD-304, Dirksen Senate Office Building
Washington, DC 20510-6150

Re: Cyber Security Legislation

Dear Senator:

I am writing on behalf of the Large Public Power Council (LPPC) to voice our strong concerns regarding cyber security legislation currently being developed in the Senate Energy and Natural Resources Committee and scheduled for a mark up Thursday, May 26. The proposed bill would seriously undermine the current North American Electric Reliability Corporation (NERC) standards-making process while creating confusion and increasing costs without fostering cyber security. The bill as currently drafted will effectively replace the current NERC standards-making process with regulatory regimes that dictate “one-size-fits-all” approaches to address cyber security issues.

During Thursday’s mark up of the cyber security legislation, we urge you to support amendment language that would strike the provisions of the bill that authorize the Federal Energy Regulatory Commission (FERC) to develop standards to address cyber security vulnerabilities, and to leave development of those standards to the NERC process. Without the deletion of the language in the bill to grant FERC broad additional authority over cyber security vulnerabilities we urge you to oppose final passage of cyber security bill.

The Large Public Power Council represents 25 of the largest locally owned and operated not-for-profit electric systems in the nation. LPPC member utilities are located in 11 states and Puerto Rico; and own and operate more than 86,000 megawatts of generation capacity and over 35,000 circuit miles of high voltage transmission lines. LPPC member utilities supply electricity to some of the largest cities in the country -- including Los Angeles, Seattle, Omaha, Phoenix, Sacramento, Jacksonville, San Antonio, Orlando and Austin.

LPPC members actively implement cyber security measures in their utilities, and help develop NERC reliability standards because protecting our electric systems and keeping the lights on for customers is our number one priority. The NERC process to develop cyber security standards works, and should be maintained as other federal cyber security strategies evolve.

We appreciate your continued leadership on crafting responsible cyber security legislation.

Sincerely,

Jorge Carrasco
Chair

Austin Energy (TX) • Chelan County PUD (WA) • Clark Public Utilities (WA) • Colorado Springs Utilities (CO) • CPS Energy (TX)
ElectriCities of North Carolina, Inc. (NC) • Grant County PUD (WA) • IID (CA) • JEA (FL) • Long Island Power Authority (NY)
Los Angeles Department of Water and Power (CA) • Lower Colorado River Authority (TX) • MEAG Power (GA) • Nebraska Public Power District (NE)
New York Power Authority (NY) • Omaha Public Power District (NE) • OUC (FL) • Platte River Power Authority (CO)
Puerto Rico Electric Power Authority (PR) • Sacramento Municipal Utility District (CA) • Salt River Project (AZ) • Santee Cooper (SC)
Seattle City Light (WA) • Snohomish County PUD (WA) • Tacoma Public Utilities (WA)