Issue Charge

CYBERSECURITY INCIDENT DISCLOSURE

Issue Source

PJM

Issue Content

This effort is intended to enhance PJM ability to ~~address potential~~ be made aware of cybersecurity incidents ~~among~~ at PJM ~~m~~Members or their agents that could ~~impact~~ (i) impact PJM's cybersecurity and ultimately grid reliability, (ii) result in access via PJM to ~~the compromised~~ Member~~'s~~ confidential information, ~~or~~ and (iii) result in a credit risk to the PJM membership resulting from compromised Member. This work activity is prompted by SEC rules that require disclosure of material cybersecurity incidents and PJM's desire to receive such disclosures, as well as to receive comparable information from non-SEC regulated Members~~, as well as the increasing number of threat actors and cyberattacks and intensity of those attacks~~.

Key Work Activities and Scope

The s~~S~~cope of this effort is ~~disclosure to~~ to ensure timely reporting to PJM of such events~~, protection of PJM and Members' cybersecurity, protection of assets, and the reliability of the grid and will not address broad policy issues~~.

Key work activities that should be undertaken to address this issue include:

1. Provide education on:
    a. SEC cyber disclosure rule and its scope
    b. The E-ISAC, the Electricity Information Sharing and Analysis Center (E-ISAC) which gathers and analyzes security data, shares appropriate data with stakeholders, coordinates incident management, and communicates mitigation strategies and how PJM members may benefit from participation.
    c. Existing disclosure requirements for Members regarding cybersecurity incidents in PJM Manual 13
2. ~~Recent cyber incidents and implications.~~
3. Review potential credit and impacts of ~~timing in addressing~~ cyberattacks on Members.
4. Discussion of the term "material" and ~~confidentiality~~ concerns cyber breaches involving Member agents.

Expected Deliverables

1 | Proposed solution to ~~address the need for~~ provide for the reporting to PJM of cybersecurity incidents at a Member company or at its agent with access to PJM systems~~disclosure from Members to PJM~~

2 | Corresponding Governing Documents and/or manual language changes

Decision-Making Method

Tier 1, consensus (unanimity) on a single proposal

Stakeholder Group Assignment

Risk Management Committee

Expected Duration of Work Timeline

Provide an estimate of the length of time expected to resolve the issue and complete its course through the stakeholder process. Include the expected start date, the issue's priority level and timing (e.g. "immediate start") and the frequency of meetings required. Please also identify any known deadlines or key milestone dates that stakeholders should be aware.

Start Date	Priority Level	Timing	Meeting Frequency
January, 2024	☒ High	☒ Immediate	☐ Weekly
	☐ Medium	☐ Near Term	☒ Monthly
	☐ Low	☐ Far Term	☐ Quarterly

Expected completion time 4-6 months

Charter

(check one box)

☐	This document will serve as the Charter for a new group created by its approval.
☒	This work will be handled in an existing group with its own Charter (and applicable amendments).

More detail available in M34; Section 6