

**Justification for Non-Material or Non-Substantive Change
to the FERC-725 Information Collection,
as Proposed in the Notice of Proposed Rulemaking (NOPR) in Docket No.
RM18-2 (Cyber Security Incident Reporting Reliability Standards)**

In a NOPR issued on 12/21/2017¹, the Federal Energy Regulatory Commission (Commission or FERC) proposes to direct the North American Electric Reliability Corporation (NERC), the Commission-certified Electric Reliability Organization (ERO), to develop and submit modifications to the NERC Reliability Standards to improve the reporting of Cyber Security Incidents, including zero-consequence incidents that might be precursors to events that could affect the reliable operation of the bulk electric system. The proposed development of modified mandatory reporting requirements is intended to improve awareness of existing and future cyber security threats and potential vulnerabilities.

The requirement for NERC to develop, revise, or update Reliability Standards is already covered by the FERC-725 information collection (Certification of Electric Reliability Organization; Procedures for Electric Reliability Standards).² The OMB-approved FERC-725 information collection includes the burden, reporting and record-keeping requirements associated with:

- Reliability Standards Development
- Reliability Assessments
- Self Assessment and ERO Application
- Reliability Compliance
- Stakeholder Survey
- Other Reporting.

Accordingly, the Commission considers this as a non-material or non-substantive change to the currently approved FERC-725 information collection.

¹ The NOPR is posted in FERC's eLibrary at <https://elibrary-backup.ferc.gov/idmws/common/opennat.asp?fileID=14782154>. The Staff Presentation is posted at <https://elibrary-backup.ferc.gov/idmws/common/opennat.asp?fileID=14783676>, and the News Release is posted at <https://elibrary-backup.ferc.gov/idmws/common/opennat.asp?fileID=14783675>.

² Any Reliability Standards proposed by NERC in compliance with Docket No. RM18-2 would be considered by the Commission in future proceedings.