

**Justification for Non-Material or Non-Substantive Change
to the FERC-725 Information Collection,
as approved in the Final Rule in Docket No.
RM18-2-000 (Cyber Security Incident Reporting Reliability Standards)**

The Final Rule in Docket No. RM8-2-000 issued on 7/19/2018¹, the Federal Energy Regulatory Commission (Commission or FERC) directs the North American Electric Reliability Corporation² [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 approved development of modified mandatory reporting requirements is intended to improve awareness of existing and future cyber security threats and potential vulnerabilities across all Reliability Standards.

The requirement for NERC to develop, revise, or update Reliability Standards is already incorporated into the FERC-725 information collection (Certification of Electric Reliability Organization; Procedures for Electric Reliability Standards).³ 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 Final Rule is posted in FERC's eLibrary at <https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14975865>. The Staff Presentation (for the NOPR in Docket No. RM18-2-000) is posted at <https://elibrary-backup.ferc.gov/idmws/common/opennat.asp?fileID=14783676>, and the News Release (for the NOPR in Docket No. RM18-2-000) is posted at <https://elibrary-backup.ferc.gov/idmws/common/opennat.asp?fileID=14783675>.

² Also known as NERC

³ Any Reliability Standards proposed by NERC in compliance with Docket No. RM18-2 would be considered by the Commission in future proceedings.