

# Appendix IV: Comments from the Department of Commerce



**UNITED STATES DEPARTMENT OF COMMERCE**  
**The Secretary of Commerce**  
Washington, D.C. 20230

December 20, 2010

Mr. Gregory C. Wilshusen  
Director, Information Security Issues  
United States Government Accountability Office  
Washington, DC 20548

Dear Mr. Wilshusen:

Thank you for the opportunity to comment on the draft report entitled "Electricity Grid Modernization: Progress Being Made on Cybersecurity Guidelines, but Key Challenges Remain to be Addressed" (GAO-11-117).

We agree with the report's recommendations that (1) the National Institute of Standards and Technology (NIST) finalize its plan and schedule for updating its cybersecurity guidelines, and (2) the Federal Energy Regulatory Commission develop a coordinated approach to monitor voluntary standards and address any gaps in compliance. We offer the following comments regarding GAO's conclusions.

1. Throughout the report, replace "missing key elements" with "NIST's follow-on cyber-physical activity."
2. Page 16. Delete the following two sentences in the first paragraph: "As a part of this assessment, NIST planned to address other key elements of cybersecurity, including the impact of coordinated cyber-physical attacks, and identifying smart grid system vulnerabilities. The working group intended to complete these efforts and issue the guidelines in June 2010." NIST stated that it plans to include these elements in revisions to the guidelines that were issued in September 2010, not those issued in June 2010. These sentences incorrectly imply that NIST has not completed planned activities related to cyber-physical attacks.
3. Page 29. NIST agrees that the risk of combined cyber-physical attacks on the smart grid is an area that needs to be more fully explored in the future, but disagrees with the statement that NIST was planning to cover it in the August 2010 final document. That document states that follow-on activities of the Cybersecurity Working Group need to address cyber-physical attacks.

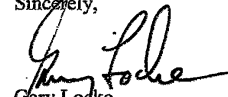
Therefore, we suggest changing the wording of the recommendation to "To ensure that NIST's smart grid cybersecurity guidelines will be as effective as intended, we

Mr. Gregory C. Wilshusen  
Page 2

recommend that the Director of NIST finalize the agency's plan for updating and maintaining the cybersecurity guidelines, including ensuring it incorporates (1) an assessment of the types and effects of combined cyber-physical attacks and (2) specific milestones for when efforts are to be completed. We also recommend that NIST, as a part of finalizing the plan, assess whether any cybersecurity challenges identified in this report should be addressed in the guidelines."

Please contact Rachel Kinney, NIST Management and Program Analyst, at (301) 975-8707; if you have any questions regarding this response. We look forward to receiving your final report.

Sincerely,



Gary Locke