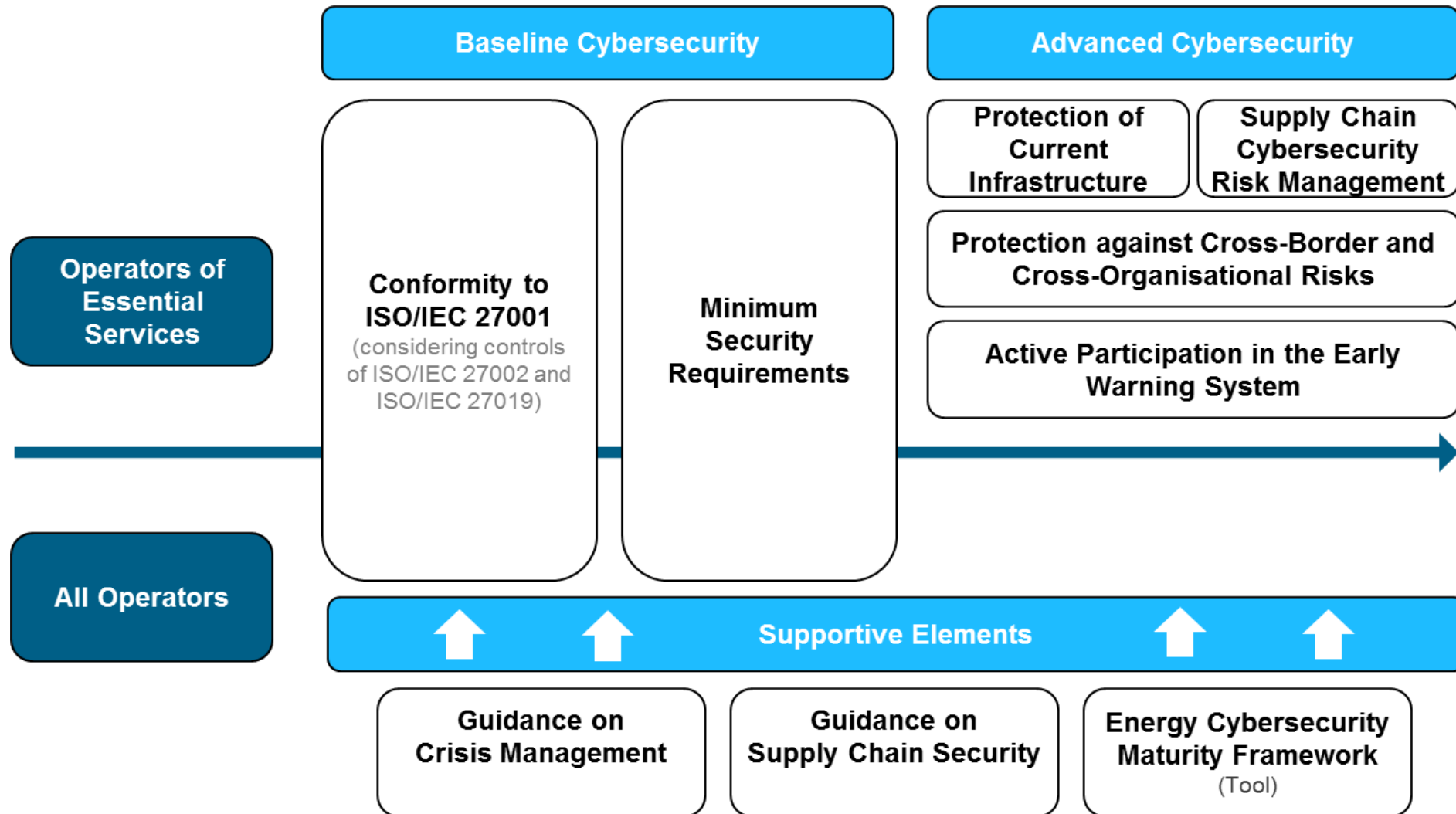


Gaps between the actual CS implementation and the full compliance of energy operators with standard CS requirements: is a NC the solution?

Alexander Dusolt

CEER Cybersecurity Workshop

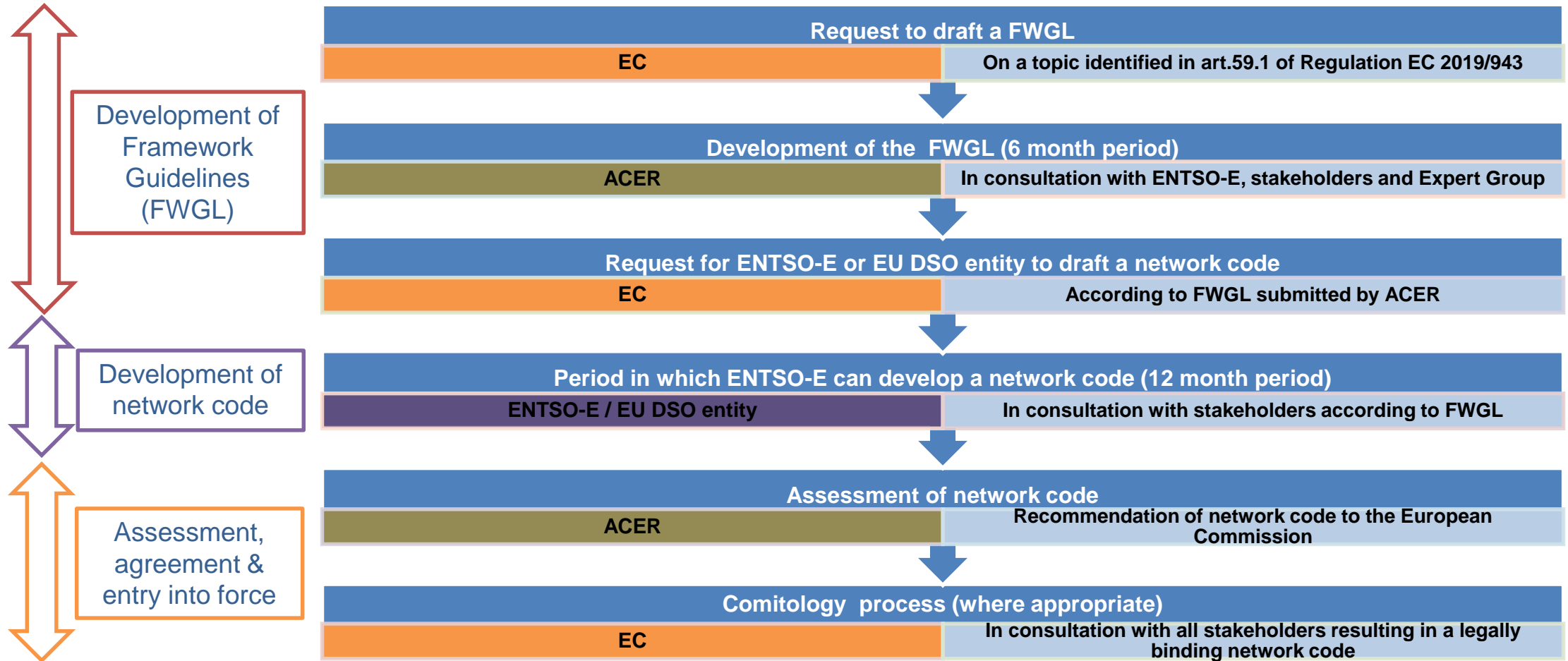
SGTF – EG2 report: Recommended Structure for the Network Code on Cybersecurity



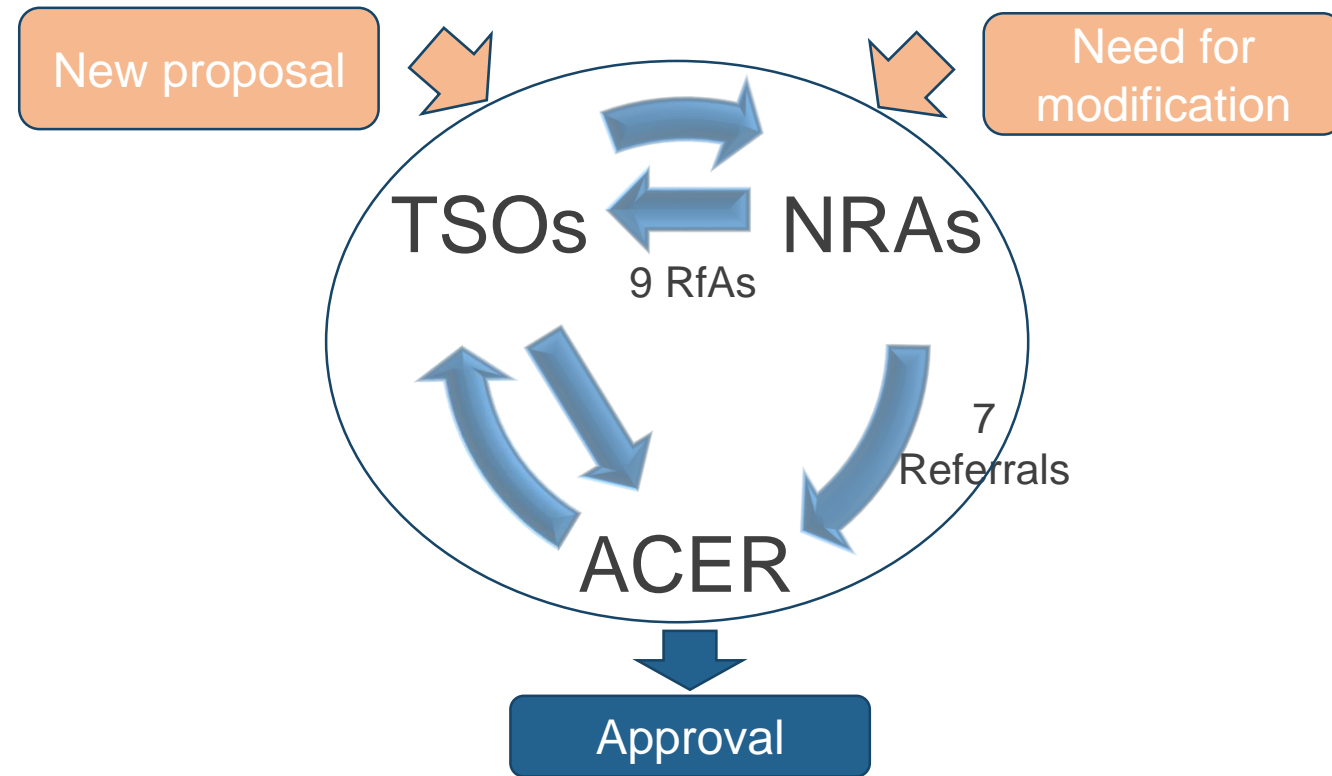
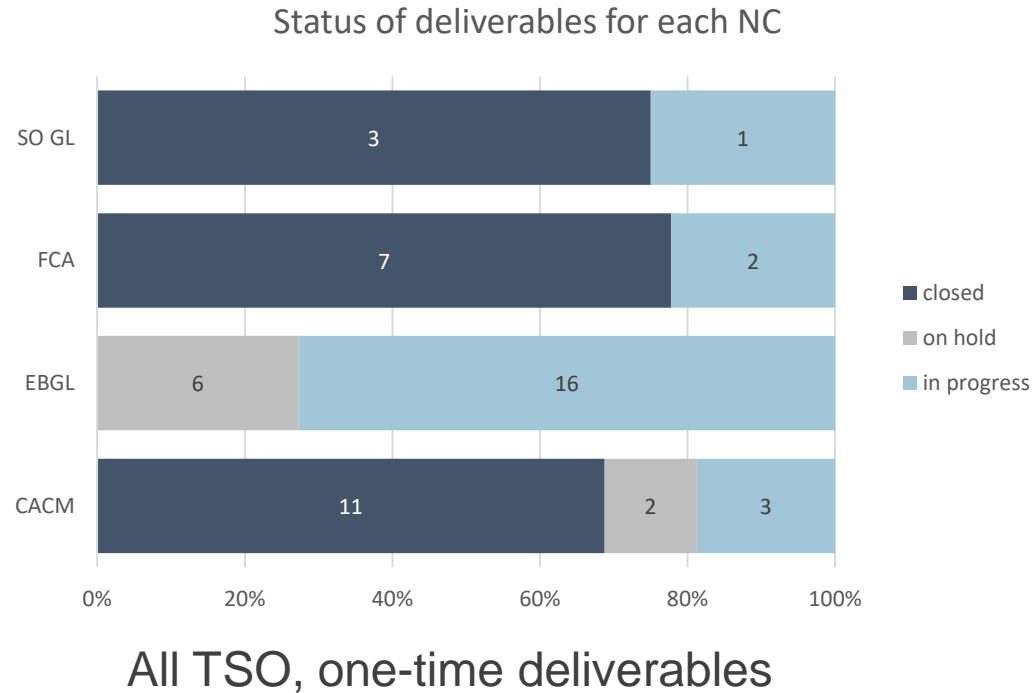
Key points

1. Minimum Cyber security requirements applicable to all Operators, more advanced requirements applicable to Operators of Essential Services (OES) – as defined by the NIS Directive.
2. Current problem areas
 - TSOs are currently at **different Cyber maturity levels**, some immature with few Cyber security processes and controls, some very advanced. Objective is to bring all TSOs up to a minimum defined level, based upon ISO/IEC 27001 standard.
 - some EU member states have not yet **identified their OES**.
3. ENTSO-E is currently performing preparatory work to determine the **scope of such a 27001 certification**. Too narrow a scope and any certification is useless and not effective, too wide a scope and it becomes very expensive with a danger of certification failure. Need to fine tune the certification scope to TSOs.
4. Benefits of ISO/IEC 27001 certification. (1) Governance. Management have identified **key Cyber roles** and defined accountability and responsibility, e.g. Security Officer, Data Protection Officer, Disaster Recovery/Business Continuity, Crypto custodian, and associated budgets. (2) **Risk Management process** has been defined, and Operators have identified acceptable and unacceptable Cyber related risks, in other words their **risk tolerance**. Without these two key controls, an Operator cannot perform the most basic Cyber security.
5. Advanced requirements for OES includes Supply Chain security controls and Cross Border Cross Organizational Risk management, looking at the Cyber impact to other Operators.

Process to draft Network Code



Status on implementation of Network Codes



- Implementation still requires a lot of resources
- Amendments will require further resources from all stakeholders
- Decisions on new Network codes to be taken wisely considering limitation on resources