

Information
Economic Matters
3/9/2023

House Bill 969 - PSC - Cybersecurity Staffing & Assessments (Critical Infrastructure Cyber - Security Act of 2023)

Baltimore Gas and Electric Company (BGE) offers this letter of information on House *Bill 969 - PSC - Cybersecurity Staffing & Assessments (Critical Infrastructure Cyber - Security Act of 2023)*. The bill requires that the Public Service Commission (Commission) maintain expertise, establish cyber security standards, conduct periodic assessments, and require certain companies to implement certain cybersecurity standards.

The utility industry has been comprehensively addressing cyber- and physical-security threats and BGE and other Exelon companies are viewed as leaders in this space. We urge the General Assembly to continue to allow utilities to align our programs with federal industry standards and requirements that incorporate strong cybersecurity controls and best practices which will be overseen by the Commission without the use of a third-party assessor. A third-party expert certification approach may introduce unintended risks such as inconsistencies among these third-party evaluators. A key factor in successful compliance programs is consistency—relying solely on third parties to perform compliance verifications may result in divergent compliance monitoring approaches and interpretations.

BGE is well-positioned on cyber security and has concerns with the additional elements House Bill 969 would place on us. We look forward to working with the sponsor on amendments to align efforts to ensure a comprehensive and protective cybersecurity program is in place at public service companies.