Consolidated Stakeholder Comments and Response on

Draft Detailed Procedure for Functions of Cyber Security Coordination Forum

Suggestions received from Stakeholders by the Nodal Agency

S. No.	Stakeholder
1.	National Critical Information Infrastructure Protection Centre
2.	Southern Regional Power Committee (SRPC) – Secretariat

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Comments from NCIIPC:

S. No.	Stakeholder/Comment	Grid-India Remarks
1	The roles and responsibilities of the committees to be constituted at central and regional level are more focused towards capacity building, compliance monitoring, incident management and sharing best practices rather than focusing on cyber security challenges and gaps. Therefore, it is suggested that the roles and responsibilities of the committee should be more focused on identification of the cyber security challenges & gaps such as presence of obsolete technologies/ End of Life/ End of support issues etc. and deliberating on the solutions thereof to overcome these gaps and challenges. Following roles and responsibilities may also be considered: - a. Cyber security challenges & gaps faced by the stakeholders, b. Cyber security initiatives taken by stakeholders to mitigate these gaps and challenges c. Emerging threats, challenges and solution for mitigation	Necessary modification on the draft procedure has been made to have more stress upon the function for deliberation on Cyber Security Challenges and Gap Analysis has been done. It may be appreciated that implementation of cyber security best practices requires resource adequacy, suitable knowledge sharing platform, awareness of advanced technologies and strong policy frameworks. Role of coordination forum therefore also includes deliberation and directions in these issues so that the expertise of the members can be harmonized and best utilized in development of the cyber security maturity of Grid Operation Sector.
2	CERC regulations are applicable to all the Sectoral CERTs. CERT-Transmission, CERT-Thermal, CERT-Hydro, CERT-RE and CERT-Distribution also needs to form Cyber Security Coordination Forum to coordinate and deliberate on the cyber security challenges and gaps. Therefore, it is suggested that all sectoral CERTs in consultation with CSIRT–Power shall formulate a consolidated SOP for Cyber Security Coordination Forum which will be applicable across the Power Sector	As per mandates received this procedure has been framed for CERT-GO Sector keeping in view the requirement of Grid Operation domain. Hon'ble commission may like to review the comment received from NCIIPC.

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Comments from SRPC:

S. No.	Subject/ Heading	Original Clause	Stakeholder/Comment	Grid-India Remarks
1	4/Page 5	These procedures are applicable for all activities related to formation, roles & responsibilities and activities of Cyber Security Coordination Forum and Regional level sub-committees to ensure cyber security preparedness and compliance by National / Regional / State Load Despatch Centres and any other utility (if any) to be declared time to time by the concerned statutory bodies under CERT-Grid Operation.	These procedures are applicable for all activities related to formation, roles & responsibilities and activities of Cyber Security Coordination Forum -GO and Regional level sub-committees -GO to coordinate and deliberate on the cyber security challenges and gaps at appropriate level. **Reason stated:** As per provision of IEGC	Necessary modifications have been made in the document.
2	6.1/Page 6	The Chairperson of the Committee shall be selected by members on rotational basis from among the Heads of the member SLDCs / RLDC. The tenure of the Chairperson shall be 1 year.	The Chairperson of the Committee shall be Head of the RLDC. **Reason stated**: More Central Guidelines, Regulations, direction to be implemented.	GRID-INDIA feels that better participation of all stake holders and initiatives can be ensured through the present provision of having the Chairmanship of the committee on rotational basis. Hon'ble Commission may like to review.

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S. No.	Subject/ Heading	Original Clause	Stakeholder/Comment	Grid-India Remarks
	6.2.2/Page 7	6.2.2. Compliance Monitoring & Incidence Management a) Monitoring compliance to Regulatory and Statutory Requirements on Quarterly basis	6.2.2. Cyber Security Challenges & Gaps a) Cyber Security Challenges & Gaps review on Quarterly basis. **Reason stated**: As per Regulation 53 of IEGC 2023	Necessary modification as suggested has been incorporated
	6.3(a) Page 8	Progress review of the activities conducted towards accomplishment of the roles and responsibilities assigned as per Para 4.2 above.	Progress review of the activities conducted towards accomplishment of the roles and responsibilities assigned as per Para 6.2 above.	Corrected
	6.3(b) Page 8	Action / compliance towards the recommendations and resolutions of the Central level committee meetings as applicable	Review of action / compliance towards the recommendations and resolutions of the Central level committee meetings as applicable	The Regional Level Committee should act upon the recommendations of the Central Level committee. This agenda point creates provision for formulation of plan for execution of the recommendations. Agenda point re-texted accordingly.

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S. No.	Subject/ Heading	Original Clause	Stakeholder/Comment	Grid-India Remarks
	6.3 /Page 9	The meetings shall be organised and funded ~~on rotational basis~~ by the member RLDC ~~& SLDCs~~. The expenditure shall be met by respective RLDC~~/SLDC~~ from ARR/fees & charges. The minutes of the meeting shall be published and circulated among the members, central coordination forum and relevant statutory bodies.	The meetings shall be organised and funded by the member RLDC or it may be held through VC. The expenditure shall be met by respective RLDC from ARR/fees & charges. The minutes of the meeting shall be published and circulated among the members, central coordination forum and relevant statutory bodies.	For, smooth management the suggestion of bearing the cost only from the concerned RLDC has been incorporated. However, for a Quarterly meeting of such august forum it is prudent to have physical interaction to have more effective coordination. Provision has been modified accordingly.
	7.2.2/Page 11	Compliance Monitoring, Incidence response and Emergency preparedness a) Review and Monitoring of compliance	Cyber Security Challenges & Gaps, Incidence response and Emergency preparedness a) Review and Monitoring ~~of compliance~~	Necessary modifications have been made.
	New Clause	-	Review of GO-x'R-CSCF	Available in Agenda of the meeting of the Central Committee at Cl.7.3(c).