

EU Cybersecurity Act

A Eurelectric consultation response paper

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

WG Sustainable Network Technology

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Consultation response on the EU Cybersecurity Act

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EXECUTIVE SUMMARY

Eurelectric welcomes the evaluation and upcoming review of the existing EU Cybersecurity Act. The review can, if designed appropriately, be useful to support the electricity sector in reinforcing energy security in Europe.

- **ENISA plays a vital role** in coordinating cybersecurity measures across the electricity sector, particularly in ensuring the resilience and security for the European grid.
- **Effective implementation of the existing cybersecurity legislation** is essential to ensure cooperation among European actors and enhance collective resilience.
- Nonetheless, **limited and evidence-based adjustments to the Cybersecurity Act could be appropriate**. In this context, option 2 (non-legislative measures such as changing ECCF) and option 3 (targeted regulatory intervention to change ENISAs mandate and ECCF) appear to be the most relevant and proportionate approaches.

The power sector is undergoing a major transformation to drive society's electrification and decarbonisation. This requires increased digitalisation, in particular on grids, at a time when the sector is facing increasing cyber threats. In this context, addressing cybersecurity in the European electricity sector is vital.

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Given the critical nature of the European electricity sector—particularly the grid—a strong European-level coordination is essential to support the industry's cybersecurity efforts. In this regard we welcome ENISA's efforts in balancing national and EU-level measures.

1. We believe ENISA have a strong role to play and should receive the adequate resources to perform their mandated tasks.
2. We believe a mapping of involved EU-bodies would give more clarity to the sector.

Effective implementation of the existing cybersecurity legislation is essential to ensure cooperation among European actors and enhance collective resilience.

3. The electricity sector now needs time to fully implement the new framework on cybersecurity. Regulations should only be developed or changed in case of a specific need that the sector does not cover and cannot implement alone. It is for now important to promote these regulations and implement the corresponding measures.

Limited and evidence-based adjustments to the Cybersecurity Act could be appropriate. In this context, option 2 (non-legislative measures such as changing ECCF) and option 3 (targeted regulatory intervention to change ENISA's mandate and ECCF) appear to be the most relevant and proportionate approaches.

4. Regulatory intervention could consist in targeted changes to better reflect the mandate of ENISA by adding the tasks already provided for in other legislative acts.
5. Regarding the ECCF, it could consist in targeted changes to clarify the framework and to formalise procedures regarding the maintenance phase of certification schemes. This might also ease its implementation.
6. Simplification and harmonisation among the many cybersecurity laws that encompass supply chain, reporting requirements or emergency responses would enhance their overall effectiveness and reduce administrative burden.

Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability



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