



Submitted via cyberframework@nist.gov

March 17, 2023

U.S. Department of Commerce
National Institute of Standards and Technology
100 Bureau Drive
Gaithersburg, MD 20899

Re: AGA Comments to National Institute of Standards and Technology (“NIST”) request for additional input to the “NIST Cybersecurity Framework 2.0 Concept Paper: Potential Significant Updates to the Cybersecurity Framework” (“Concept Paper”) published on January 19, 2023

The American Gas Association (“AGA”) appreciates the opportunity to comment on the National Institute of Standards and Technology (“NIST”) Cybersecurity Framework (“CSF”) 2.0 Concept Paper: Potential Significant Updates to the Cybersecurity Framework” (“Concept Paper”) published on January 19, 2023.

AGA, founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 77 million residential, commercial, and industrial natural gas customers in the U.S., of which 95 percent — more than 73 million customers — receive their gas from AGA members. AGA is an advocate for natural gas utility companies and their customers and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international natural gas companies, and industry associates. Today, natural gas meets more than one third of the United States' energy needs.¹

AGA members actively engage in cybersecurity risk management practices guided by a commitment to the safe and secure delivery of natural gas. For nearly a decade, we have worked along-side NIST promoting the adoption of the CSF across government and owner/operators. We

¹ For more information, please visit www.aga.org.



appreciate the ongoing effort by NIST to support a broad, cross-sector cybersecurity framework to reduce cybersecurity risk to critical infrastructure.

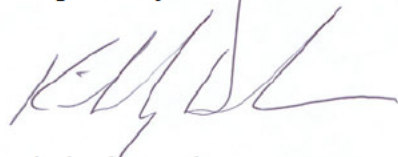
AGA members generally feel the CSF is a valuable tool that has been widely adopted by many companies and partners. It is a risk- and performance-based framework critical for effective management of cybersecurity vulnerabilities. As written, the CSF affords energy utilities the latitude to balance safety and operational risks as driven by an evolving cyber threat landscape.

Recognizing there are areas for improvement, we caution against an overhaul of the CSF. The language has become a common lexicon for many – interwoven into our cyber fabric – and has already been built into many corporate processes and other frameworks. AGA is filing this letter of support for the comments submitted by the Edison Electric Institute (“EEI”) in response to the additional input sought by NIST to the “NIST Cybersecurity Framework 2.0 Concept Paper: Potential Significant Updates to the Cybersecurity Framework” published on January 19, 2023. EEI is the association that represents all U.S. investor-owned electric companies. AGA and EEI have a common interest among our overlapping energy utility members.

AGA appreciates the opportunity to comment. [REDACTED]

[REDACTED]

Respectfully Submitted,



Kimberly Denbow
Vice President, Security & Operations
American Gas Association
[REDACTED]