

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of a Working Case to Address)
Security Practices for Protecting Essential) **File No. AW-2015-0206**
Utility Infrastructure)

STAFF REQUEST FOR COMMISSION ORDER

COMES NOW the Staff of the Missouri Public Service Commission and for its Request states:

1. On March 4, 2015, the Commission opened this matter “to review and consider the physical and cyber security practices of all Missouri utilities.”

2. On March 23, the Staff and interested persons participated in a workshop to discuss issues related to cybersecurity and physical infrastructure security as they affect all Missouri utilities. At that workshop, a consensus was reached that a set of questions should be sent to all utilities, asking about those matters. Included as “Attachment A” is the list of questions the Staff has developed in consultation with interested stakeholders. Attached as “B” and “C,” are lists of companies the Staff requests be required to respond.

3. The Staff requests that the Commission issue an Order requiring those listed companies to file a response in this docket to the question set forth in Attachment A on or before July 15, 2015. The Staff asks that the companies file responses in this matter without being required to copy their comments to other listed participants in this matter. Finally, the Staff requests that the Commission electronically disseminate the Order as widely as possible to all the entities on its weekly email distribution list.

WHEREFORE, the Staff submits its Request for Commission Order.

Respectfully submitted,



Colleen M. Dale
Senior Counsel
Missouri Bar No. 31624
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-4255 (Telephone)
cully.dale@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 8th day of June, 2015.



Commission Staff questions related to cybersecurity and critical infrastructure security
Docket AW-2015-0206

Company Name:

Contact Person:

Contact Information:

1. Does your company participate in an internal or external critical infrastructure or cybersecurity vulnerability assessment? If yes,
 - a. Is the assessment conducted by a qualified independent third party and if so, by whom?
2. If your company has deployed Advanced Metering Infrastructure (AMI), does your company have independent security audits conducted on a periodic basis?
3. Does your company have a written policy regarding the treatment of customer data?
 - a. Is the written policy regarding treatment of customer data shared with your customers?
 - b. Does your process or policy include associated timeframes for notifying customers if a successful cybersecurity breach occurs which impacts customer data?
4. Please provide an organizational diagram of the company's security team, including all required support personnel
5. Does the company have a qualified security team with adequate support personnel?
6. Does your company participate in regional or national tabletop exercises, conferences, committees or other events related to critical infrastructure security threats and/or cybersecurity threats? If yes, please identify the various groups, activities or events.
7. Does your company have emergency preparedness plan(s) that include policies and procedures that includes continuity of operations plans and disaster recovery plans related to critical infrastructure security threats? If yes,
 - a. Does your plan include alternative methods for meeting critical functions in the event of an incident?
 - b. Does your company have retainers or contracts for outside help in the event of an incident?
 - c. Does your company participate in any resource sharing agreements of mutual assistance agreements?
8. Does your company have emergency preparedness plan(s) that include policies and procedures that includes continuity of operations plans and disaster recovery plans related to cybersecurity threats?
 - a. Does your plan include alternative methods for meeting critical functions (continuity of operations plans and disaster recovery plans) in the event of an incident?
9. Has your company conducted a physical and logical security evaluation of key assets in concert with federal guidelines?
10. Has your company conducted a cybersecurity or physical security risk assessment?
11. Does your company have retainers or contracts for outside help in the event of an incident?

12. Does your company participate in any resource sharing agreements or mutual assistance agreements?
13. Does your company have a process in place to alert of threats to critical infrastructures?
14. Does the company employ risk or vulnerability assessment tools that relate to critical infrastructure security or cybersecurity?
15. Does your company keep records of attempted or successful threats to critical infrastructure or cybersecurity?
16. Does the company have a reporting process in the event of an attempted breach of critical infrastructure, whether successful or not?
17. Does your company have an internal root cause analysis and correction action process to evaluate critical infrastructure security and to take action to prevent an event and/or recurrence?
18. Does the company have a reporting process in the event of an attempted cybersecurity breach, whether successful or not?
19. Does the company have a reporting process if a successful cybersecurity breach does occur that impacts customer data?
20. Does your company have an internal root cause analysis and correction action process to evaluate cybersecurity and to take action to prevent an event and/or recurrence?
21. What interaction/reporting, if any, should occur between your company and the Missouri Public Service Commission related to critical infrastructure security or cybersecurity?
22. What format should be used to provide the interaction/reporting described in response to question 21?

Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102

Ameren Missouri
Wendy Tatro
1901 Chouteau Avenue
St. Louis, MO 63103-6149
AmerenMOService@ameren.com
314-554-3484

ITC Midwest LLC
Carl J. Lumley
130 S. Bemiston, Ste. 200
St. Louis, MO 63105
clumley@lawfirmemail.com
314-725-8788

Empire District Electric Company
Dean L. Cooper
312 East Capitol
P.O. Box 456
Jefferson City, MO 65102
dcooper@brydonlaw.com
573-635-7166

Kansas City Power & Light Company
Roger W. Steiner
1200 Main Street, 16th Floor
P.O. Box 4186794
Kansas City, MO 64105-9679
Roger.steiner@kcpl.com
816-556-2314

KCP&L Greater Missouri Operations
Company
Roger W. Steiner
1200 Main Street, 16th Floor
P.O. Box 418679
Kansas City, MO 64105-9679
Roger.steiner@kcpl.com
816-556-2314

Office of the Public Counsel
Dustin Allison
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opcservice@ded.mo.gov
573-751-5318

Entergy Arkansas, Inc.
James C. Swearngen
312 East Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102
LRackers@brydonlaw.com
573-635-7166

Ameren Missouri
Beth A. Burns
P.O. Box 66149 (MC 1300)
1900 Chouteau Avenue
St. Louis, MO 63166-6149
AmerenMOService@ameren.com
314-554-3271

Empire District Gas Company
Ron Gatz
602 Joplin Ave.
Joplin, MO 64802
rgatz@empiredistrict.com
417-625-5103

Liberty Utilities (Midstates Natural Gas)
Corp.
Christopher Krygier
2751 North High Street
Jackson, MO 63755
Chris.krygier@libertyutilities.com
573-755-0100

Missouri Gas Company, LLC
David J. Ries
110 Algana Court
St. Peters, MO 63376
dries@mogaspipeline.com
303-904-4874

Summit Natural Gas of Missouri, Inc.
Martha Wankum
312 East Capitol Avenue
Jefferson City, MO 65101
mwankum@summitutilitiesinc.com
573-635-9150

Ameren Missouri
Mary L. Hoyt
P.O. Box 66149 (MC 1310)
1901 Chouteau Avenue
St. Louis, MO 63166-6149
mhoyt@ameren.com
314-554-3611

Laclede Gas Company
Michael T. Cline
720 Olive
St. Louis, MO 63101
Mike.cline@thelacledegroup.com
314-342-0524

Liberty Utilities (MNG)
Christopher Krygier
2751 North High Street
Jackson, MO 63755
Chris.krygier@libertyutilities.com
573-755-0100

Missouri Gas Energy (Laclede)
Michael R. Noack
3420 Broadway
Kansas City, MO 64111
Michael.noack@thelacledegroup.com
816-360-5560

Empire District Gas Company
Angela Cloven
P.O. Box 127
602 S. Joplin Avenue
Joplin, MO 64802
ACloven@empiredistrict.com
417-625-6514

Laclede Gas Company
Rick E. Zucker
720 Olive Street
St. Louis, MO 63101
Rick.zucker@thelacledegroup.com
314-342-0533

Missouri Gas Company
Stephanie Morr
110 Algana Court
St. Peters, MO 63376
smorr@mogaspipeline.com
303-997-6260

Summit Natural Gas of Missouri, Inc.
Sarah Fontaine
312 E. Capitol Ave.
Jefferson City, MO 65101
SFontaine@summitutilitiesinc.com
573-893-1332

Missouri Public Utility Alliance
Floyd Gilzow
1808 I-70 Dr. SW
Columbia, MO 65203
573-445-3279
elissik@mpua.org

Association of Missouri Electric
Cooperatives
Brent Stewart
2722 East McCarty Street
Jefferson City, MO 65101
573-635-6857

Empire District Electric Company
Kelly Walters
P.O. Box 127
Joplin, MO 64802
KWalters@empiredistrict.com
417-625-6188

Middlefork Water Company
Brock Pfof
26101 Hallmark Road
Maryville, MO 64468
whiteclld@unitedsky.net
660-582-4111

Missouri American Water Company
Frank Kartmann
727 Craig Rd.
St. Louis, mo 63141
Frank.Kartmann@amwater.com
314-996-2304

Raytown Water Company
Neal Clevenger
Raytown, MO 64133
nclevenger@raytownwater.net
816-356-0333 X333107

Terre Du Lac Utilities Corporation
Michael Tilley
Bonne Terre, MO 63628
tdlu@charter.net
573-358-3376