**BEFORE THE**
**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

| | |
|---|---|
| **WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,** | |
| **Complainant,** | |
| **v.** | **Docket UE-240004** |
| | **Docket UG-240005** |
| **PUGET SOUND ENERGY,** | |
| **Respondent.** | |

**FOURTH EXHIBIT (NONCONFIDENTIAL) TO THE**
**PREFILED DIRECT TESTIMONY OF**

**BRIAN E. FELLON**

**ON BEHALF OF PUGET SOUND ENERGY**

**FEBRUARY 15, 2024**

**PSE** *PUGET SOUND ENERGY*

# Cybersecurity Roadmap

**Corporate Spending Authorization (CSA)**

| | |
|---|---|
| **Date Created:** | Thursday, April 13, 2023 |
| **Discretionary/ Non-Discretionary:** | Non-Discretionary |
| **Multi Year Rate Plan:** | Programmatic |
| **Equity Impact:** | No |
| **Strategic Alignment:** | Operate the Business-Environmental & Compliance |
| **Estimated In-Service Date:** | Sunday, December 31, 2028 |

**Current State (Business Need):**

The Cybersecurity Roadmap focuses on mitigating security vulnerabilities, preventing exposures and managing IT compliance requirements for the company's cyber assets. Deliverables are scoped annually, in collaboration with teams across the Enterprise and focus on industry-leading cyber security measures that are designed to ensure exposures and vulnerabilities to cyber assets, are mitigated in alignment with the rapidly changing security landscape. This program funds projects focused on improving PSE's overall security posture, to better prepare and protect PSE against future cyber threats while ensuring ongoing compliance with federal requirements.

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## Cybersecurity Roadmap

**Corporate Spending Authorization (CSA)**

**Desired State (Proposed Solution):**

The Cybersecurity Roadmap seeks to achieve the objectives listed below:

In-flight Deliverables
• Enhance the Splunk Security Information and Event Management System and build out NERC monitoring to match the Corporate Environment.
• Support the Digital Workplace Transformation program and ensure proper security controls are in place for future capabilities.
• Improve our Identity Access Management processes to support compliance requirements through automation of manual tasks

New Deliverables (2024+)
• To be determined annually from Cybersecurity and Compliance roadmaps.
Deliverables will include Zero Trust Strategy for the Enterprise and new OT vulnerability scanning software.

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## Cybersecurity Roadmap

**Corporate Spending Authorization (CSA)**

**Outcome/Results (What are the anticipated benefits):**

Deliverables will improve PSE's cybersecurity and compliance posture through funding various critical efforts aligning to industry standards and regulations.

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# Cybersecurity Roadmap

**Corporate Spending Authorization (CSA)**

| Dependencies: | No |
|---|---|

| Dependencies comment: | None. |
|---|---|

| Escalation Included: | No, escalation has not been included. |
|---|---|

| Total Estimated Costs: | $21,240,000 |
|---|---|

**Estimated Five Year Allocation:**

| Funds Type | ID | Line Item Description | Previous Years Actuals | Fiscal 2024 Requested | Fiscal 2025 Requested | Fiscal 2026 Requested | Fiscal 2027 Requested | Fiscal 2028 Requested |
|---|---|---|---|---|---|---|---|---|
| Capital | W_F.10025.02.01.08 | Cybersecurity Roadmap | $ - | $ 4,000,000 | $ 4,000,000 | $ 4,000,000 | $ 4,000,000 | $ 4,000,000 |
| O&M | 78189 | Labor - ZTA Data Cleansing | $ - | $ 350,000 | $ 350,000 | $ 350,000 | $ 350,000 | $ 350,000 |
| O&M | 78191 | Software Maintenance - Threat Intelligence Data | $ - | $ 360,645.00 | $ 360,645.00 | $ 360,645.00 | $ 360,645.00 | $ 360,645.00 |
| O&M | 78193 | Software Maintenance - OT Vulnerability Scanning | $ - | $ - | $ 70,000.00 | $ 70,000.00 | $ 70,000.00 | $ 70,000.00 |
| **\*Amounts do not include escalator** | | | | | | | | |

| Incremental O&M: | Non-Labor |
|---|---|

| Qualitative Benefits: | Deliverables will improve PSE's cybersecurity and compliance posture through funding various critical efforts aligning to industry standards and regulations. |
|---|---|

**Quantitative Benefits:**

| Quantitative Benefits | Benefit Type | Previous Years | Fiscal 2023 | Fiscal 2024 | Fiscal 2025 | Fiscal 2026 | Fiscal 2027 | Fiscal 2028 | Remaining Costs | Life Total |
|---|---|---|---|---|---|---|---|---|---|---|
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| Risk Summary: | None. |
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# Cybersecurity Roadmap

**Corporate Spending Authorization (CSA)**

**Change Summary:**

| Planning Cycle | Change Summary | Last Update Date |
|---|---|---|
| 2023 Cycle 1 | Split SRC roadmap CSA into Cyber, Physical, and High Risk Facilities CSAs. | 4/13/2023 |
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**PSE** *PUGET SOUND ENERGY*

## Cybersecurity Roadmap

**Corporate Spending Authorization (CSA)**

**Approval History:**

| Approved By | Date Approved |
|---|---|
| Approved by Cost Center Owner: Yonce , Lindsay | 4/13/2023 |
| Approved by Director Sponsor: Figone , Eileen | 4/13/2023 |
| Approved by Executive Sponsor: Upton , Simon | 5/16/2023 |
| CSA Status changed to Approved | 5/16/2023 |
| Approved by Cost Center Owner: Gill , Satinder | 12/4/2023 |
| Approved by Director Sponsor: Gill , Satinder | 12/4/2023 |
| Approved by Executive Sponsor: Gill , Satinder | 12/4/2023 |
| CSA Status changed to Approved | 12/4/2023 |
| Approved by Cost Center Owner: Yonce , Lindsay | 1/30/2024 |
| Approved by Director Sponsor: Figone , Eileen | 1/30/2024 |
| Approved by Executive Sponsor: Upton , Simon | 1/30/2024 |
| CSA Status changed to Approved | 1/30/2024 |

**PSE** *PUGET SOUND ENERGY*

**Physical Security Roadmap**

**Corporate Spending Authorization (CSA)**

| | |
|---|---|
| **Date Created:** | Thursday, April 13, 2023 |
| **Discretionary/ Non-Discretionary:** | Non-Discretionary |
| **Multi Year Rate Plan:** | Programmatic |
| **Equity Impact:** | No |
| **Strategic Alignment:** | Operate the Business-Safety |
| **Estimated In-Service Date:** | Sunday, December 31, 2028 |

**Current State (Business Need):**

The Physical Security Roadmap focuses on modernizing physical security systems at non-NERC PSE facilities to ensure that they are highly available, scalable and resilient. Facilities are scoped in collaboration with Operations teams in Q1 of each year and the schedule is based on risk level presented by existing security countermeasures and current threat landscape. Deliverables may include security cameras, video systems, intrusion detection systems, perimeter fencing and electronic key systems. All these physical security measures combine to provide a layered defense strategy in the protection of PSE-owned assets and sites.

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**Physical Security Roadmap**

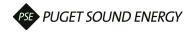**Corporate Spending Authorization (CSA)**

| | |
|---|---|
| **Desired State (Proposed Solution):** | The Physical Security Roadmap seeks to achieve the objectives listed below:<br><br>- Upgrade video systems: Replace all analog cameras with wired Internet Protocol (IP) cameras, including a variety of box, dome, and pan-tilt-zoom (PTZ) cameras. Replace all digital video recorders (DVRs) and network video recorders (NVRs) with compliant NVRs<br><br>- Upgrade intrusion detection systems: Replace existing intrusion detection systems with modern technology to detect activity outside perimeter fencing. Enhance security lighting systems and install round-based radar systems and thermal cameras.<br><br>- Enhance perimeter fencing: Replace chain-link with razor top fencing with anti-cut/anti-climb fencing at high-risk PSE (Puget Sound Energy) sites.<br><br>- Deploy Electronic Key Access Management system: Replace physical brass keys and improve physical access management capabilities and operational burden. Facilities in scope for the E-Key system are gas storage facilities, critical gas gate stations, data centers, generation sites, service centers, and offices.<br><br>- Deploy new Threat & Vulnerability Assessment (TVA) software (SaaS) to track security measures deployed across all non-NERC PSE facilities. Solution may also provide security incident tracking capabilities and replace existing, antiquated solution (ReportExec).<br><br>- Deploy Physical Security Service and Maintenance software (SaaS) to assist with tracking service requests and measuring security technician work. |

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**Physical Security Roadmap**

**Corporate Spending Authorization (CSA)**

**Outcome/Results
(What are the
anticipated benefits):**

Deliverables will improve PSE's physical security posture through funding various efforts aligning to industry standards and regulations.

**PSE** *PUGET SOUND ENERGY*

## Physical Security Roadmap

**Corporate Spending Authorization (CSA)**

| Dependencies: | No |
|---|---|

| Dependencies comment: | None. |
|---|---|

| Escalation Included: | No, escalation has not been included. |
|---|---|

| Total Estimated Costs: | $28,354,768 |
|---|---|

**Estimated Five Year Allocation:**

| Funds Type | ID | Line Item Description | Previous Years Actuals | Fiscal 2024 Requested | Fiscal 2025 Requested | Fiscal 2026 Requested | Fiscal 2027 Requested | Fiscal 2028 Requested |
|---|---|---|---|---|---|---|---|---|
| Capital | W_F.10025.01.04.01 | Physical Security Roadmap | $ - | $ 4,278,900 | $ 5,300,868 | $ 5,000,000 | $ 5,000,000 | $ 5,000,000 |
| O&M | 78195 | Software Maintenance - Physical Security Service and | $ - | $ - | $ 2,000 | $ 2,000 | $ 2,000 | $ 2,000 |
| O&M | 78197 | Software Maintenance - Threat & Vulnerability | $ - | $ - | $ 20,000.00 | $ 20,000.00 | $ 20,000.00 | $ 20,000.00 |
| *Amounts do not include escalator | | | | | | | | |
| | | | | | | | | |

| Incremental O&M: | Non-Labor |
|---|---|

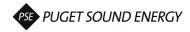| Qualitative Benefits: | Deliverables will improve PSE's physical security posture through funding various efforts aligning to industry standards and regulations. |
|---|---|

**Quantitative Benefits:**

| Quantitative Benefits | Benefit Type | Previous Years | Fiscal 2023 | Fiscal 2024 | Fiscal 2025 | Fiscal 2026 | Fiscal 2027 | Fiscal 2028 | Remaining Costs | Life Total |
|---|---|---|---|---|---|---|---|---|---|---|
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| Risk Summary: | None. |
|---|---|

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## Physical Security Roadmap

**Corporate Spending Authorization (CSA)**

**Change Summary:**

| Planning Cycle | Change Summary | Last Update Date |
|---|---|---|
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**PSE** *PUGET SOUND ENERGY*

## Physical Security Roadmap

**Corporate Spending Authorization (CSA)**

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|---|---|
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