

PB TRANSPORT LLC
114 Penwood dr,Scranton PA 18505

VIA efilling
June 16, 2025
Matthew L Homsher, Secretary
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Harrisburg PA 17120

RE: RULEMAKING TO REVIEW CYBER SECURITY SELF-CERTIFICATION
REQUIRMENTS AND THE CRITERIA FOR CYBER ATTACK REPORTING
DOCKET NO. L-2022-3034353

Dear Secretary, Matthew L. Homsher

PB TRANSPORT LLC is submitting attached comments in response to Pennsylvania Public Utility Commission's Supplemental Advanced Notice of Proposed Rulemaking (ANOPR) order sent on April 24, 2025.

As directed in ordering, the company is providing these comments and taking quick action for rulemaking on the Cyber Security.

Should you have any questions and concerning this filling, please contact me.

Sincerely
Pankaj Karki
Owner Operator
PB TRANSPORT LLC

**Comment on Rulemaking for Cybersecurity Self-Certification Requirements
Pennsylvania Public Utility Commission (PUC)
Docket No. L-2022-3034353**

The Pennsylvania Public Utility Commission's efforts to review and enhance its cybersecurity self-certification requirements for jurisdictional utilities are commendable, especially given the evolving threat landscape and increasing interconnectivity of critical infrastructure. I offer the following comments to support the rulemaking process:

1. Alignment with Federal Standards: The PUC should prioritize harmonizing its cybersecurity reporting and self-certification requirements with federal frameworks, such as the Cybersecurity and Infrastructure Security Agency's (CISA) Cyber Incident Reporting for Critical Infrastructure Act (CIRCIA). Adopting CIRCIA's definition of a "cyber incident" and its 72-hour reporting timeline, as suggested by stakeholders like PAWC and FirstEnergy, would reduce duplicative reporting burdens and ensure consistency across jurisdictions.

2. Streamlined Reporting Process: The current requirement for utilities to submit a Physical and Cyber Security Planning Self-Certification Form annually as part of their financial or assessment reports is valuable but could be streamlined. The proposal to eliminate the Self-Certification Form and related reporting requirements under Chapter 101, as outlined in the Staff Working Proposals, warrants careful consideration. Replacing the form with a certification of compliance with an exempted cybersecurity program could reduce administrative burdens while maintaining oversight, provided robust auditing mechanisms are in place.

3. Confidentiality and Security of Submissions: The PUC's practice of treating completed Self-Certification Forms as confidential and storing them separately at Docket No. M-00031717 is prudent, given the sensitive nature of the information. However, the Commission should further clarify how it will safeguard electronic submissions and ensure that confidential data is not inadvertently disclosed, addressing concerns raised by stakeholders like EAP and PA-American.

4. Support for Small and Medium Utilities: The PUC's publication of Cybersecurity Best Practices for Small and Medium Pennsylvania Utilities is a critical resource. The rulemaking should incorporate provisions to assist smaller utilities in meeting self-certification requirements, such as providing templates, training, or access to CISA's resources. This would enhance compliance without imposing disproportionate costs.

5. Flexibility for Future Updates: The proposed regulation allowing a 120-day implementation period for updates to incorporated cybersecurity standards is a practical approach. This flexibility ensures utilities have sufficient time to adapt to new requirements while maintaining compliance with evolving best practices.

In conclusion, the PUC's rulemaking should aim to create a clear, efficient, and secure framework for cybersecurity self-certification that aligns with federal standards, supports utilities of all sizes, and protects Pennsylvania's critical infrastructure. I appreciate the opportunity to comment and encourage the Commission to continue engaging stakeholders to refine these regulations.

Sincerely,

PB TRANSPORT LLC

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