









Cybersecurity in the energy sector 2020 – gap analysis

 Governance

Governance	Albania	Bosnia and Herzegovina	Georgia	Kosovo*	Moldova	Montenegro	North Macedonia	Serbia	Ukraine
Strategy	•		•		•				
Legislation									
Standards	•	•		•	•	•	•		

Competences

- Shared between authorities for national security / justice and information society / administration
- Sectoral (energy) authorities responsible for critical infrastructures, with no cybersecurity competences

Strategies

- Cybersecurity strategies as initial form of legislation expired or in the proces of updates / development / adoption
- No sectoral (energy-specific) cybersecurity strategy (initiatives exist)

Legislation

- EU convention on cybercrime / cyber defence enforcement broadly implemented since 2010
- Critical information infrastructure provisions partially transposed, no compliant legislation in force

Technical standards

- National or sectoral criteria / rules not enforced.
- ISO/IEC 27001, 27019 partially applied by most of the energy operators

CSIRT

- Teams covering energy sector established, no energy CSIRT exists

energy-specufuc provisions compliant act in force

insufficient energy references act / measure still incompliant

act / measure not adopted



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o Critical Infrastructure

CI	Albania	Bosnia and Herzegovina	Georgia	Kosovo*	Moldova	Montenegro	North Macedonia	Serbia	Ukraine
Contact point	•		•					•	
CII / ES								•	
CI Criteria				•	•			•	
Designation	•	•	•	•	•	•	•	•	
Security plan			•		•	•		•	•

Identification

- CII and CI not coherent, public infrastructure, Protected infrastructure (security), 2-level criteria
- private infrastructure not included, criteria not defined / not quantified

Designation

- National mechanisms for designation not established, liaison officers not appointed / available
- Rules for bilateral (cross-border) designation not developed, information not published
- essential services not defined

Security Plans

- Operator security plans not required or not not energy-critical
- Legal enforcement is missing, regional security component not included

energy-specufuc provisions

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 Energy environment 	Energy Regulator	Albania	Bosnia and Herzegovina	Georgia	Kosovo*	Moldova	Montenegro	North Macedonia	Serbia	Ukraine
	powers				•				•	

Requirements for CI operators

- critical assets list / threar scenarios not defined, risk assessment rules not developed or general (CSIRT)
- Resilience targets, maturity assessment, contingencies not required
- Certification criteria not consistent or not applied
- Reporting obligations not enforced / defined, or related to CSIRT authority
- policy / mechanisms / infrastructure for early warning
- energy-specific requirements (OT security rules, cascading risk assessment, treatment of legacy infrastructyre)

Requirements for Energy Regulators

- overal powers of NRA in cybersecurity are missing
- required competences in application of cybersecurity standards, costs of assets transfered to regulated tariffs
- competences of NRA in definition of procurement criteria and tendering for new infrastructures
- monitoring competences for application of rules and performance of the operators
- Exchange of information
 - Establishment of national / regional energy ISAC

energy-specufuc provisions

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- www.energy-community.org
- Ener_Community
- in /company/energy-community
- f /Ener.Community
- /EnergyCommunityTV



Cybersecurity in the Energy Community in 2021

Representation in CyberCG and its Working Groups (update, set-up of coordination structure)

Legislation

- Transposition of the acquis ongoing projects support (roadmap, draft assessment / proposals)
- NRA powers in cybersecurity

Critical infrastructure

- Draft criteria / methodology for the energy sector
- Designation mechanisms model, cooperation
- Methodology for OT and legacy infrastructure

Exchange of information

- Initiative for establishment of EnC Energy ISAC
- Reporting obligations for operators (critaria, rules)

Cybersecurity Academy

- Training programs Governance (legal), Regulatory, OT security DSO / TSO (electricity, gas)
- Risk Preparedness in cybersecurity methodology, roadmap, traininmg session, exercises