

October 9, 2026

Mr. Andrew McClure
Director Office of Cybersecurity, Energy Security, and Emergency Response
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585-0121

RE: Comments of the Electrical Generating Systems Association on DOE's Request for Information on the Bulk-Power System Executive Order (Docket No. DOE-HQ-2026-1123, Sept. 9, 2026)

Dear Director McClure:

The Electrical Generating Systems Association (EGSA) respectfully submits these comments in response to the Department of Energy's Request for Information regarding implementation of Executive Order 14421, Declaring a National Emergency to Secure the United States Bulk Power System. EGSA is the world's largest organization dedicated exclusively to onsite power generation. EGSA's more than 500 member companies include manufacturers, distributors and dealers, contractors and integrators, manufacturers' representatives, consulting and specifying engineers, service firms, and end users whose expertise spans generators, engines, turbines, switchgear, transfer switches, controls, and energy storage systems.

EGSA urges DOE to adopt a clear, risk-based framework focused on equipment configuration and use, with predictable treatment for customer-sited and emergency standby systems. Specifically, DOE should: (1) adopt a function-based scope; (2) create streamlined treatment for standby systems; (3) evaluate mixed-use equipment at the installation level; (4) use consequence and connectivity screens; (5) rely on existing documentation and allow targeted mitigation; and (6) clarify the scope and criteria for determining equipment restrictions.

1. Adopt a Function-Based Scope

DOE should base coverage on equipment function, configuration, export authorization, dispatch, and potential bulk-system impact. These characteristics provide a more reliable indication of whether equipment presents the risks addressed by the Executive Order than technology, fuel, capacity, voltage, facility size, customer type, operating profile, duty cycle, or load criticality alone.

A function-based approach would allow DOE to distinguish equipment used for customer-sited generation from equipment configured or relied upon to affect bulk-power-system operations. It

would also avoid treating equipment with different uses and system impacts as equivalent merely because it falls within the same general product category.

2. Create Streamlined Treatment for Standby Systems

DOE should exclude or streamline review of standby generation that serves discrete loads, does not routinely operate in parallel with or export to the grid, and performs no bulk-system dispatch, protection, control, restoration, or black-start function.

Availability to operate at the request of a utility, grid operator, or DOE during a declared emergency should not, by itself, bring standby equipment within scope. Streamlined treatment for these systems would preserve DOE's focus on equipment with a meaningful bulk-system role while providing predictable treatment for equipment used to maintain onsite power during grid disruptions.

3. Evaluate Mixed-Use Equipment at the Installation Level

DOE should assess mixed-use equipment based on each installation's documented configuration and operation. Grid-parallel capability or a utility connection should prompt fact-specific review, not automatic coverage, because the same type of equipment may be configured and used differently across installations.

DOE should examine how the equipment is actually interconnected, whether export is authorized, whether it is subject to dispatch, and what functions it performs. If an installation's configuration or use later changes, DOE should assess coverage prospectively from the date of that change rather than based on the original sale or installation.

4. Use Consequence and Connectivity Screens

DOE should prioritize equipment whose failure or compromise could cause off-site, cascading, regional, restoration, or transmission-control impacts. That assessment should be based on actual connectivity, remote-control capability, dispatch, export controls, and operational dependencies.

The presence of communications capability should not alone determine coverage. DOE should consider whether the deployed configuration creates a pathway or control capability that could affect bulk-power-system operations, and whether the consequences of a failure or compromise would extend beyond the customer site.

5. Rely on Existing Documentation and Allow Targeted Mitigation

DOE should accept ordinary-course records to establish equipment status and configuration. Relevant records may include interconnection and export documentation, operating records, equipment specifications, and communications information already maintained by manufacturers, integrators, owners, and operators.

Where a particular function or pathway presents concern, DOE should allow targeted mitigation rather than restricting an entire equipment category. Appropriate measures may include export limits, restricted parallel operation, removal of dispatch capability, and segmented remote communications. DOE should also recognize accredited third-party cybersecurity certifications, such as IEC 62443, and establish a pre-qualification process with published criteria and defined decision timelines.

6. Clarify the Scope and Criteria for Determining Equipment Restrictions

DOE should limit security restrictions to equipment connected to, or capable of directly affecting, the bulk-power transmission system. Restrictions should not extend to facility equipment with no functional bulk-system nexus.

DOE should expressly exclude behind-the-meter and low-voltage equipment that serves only downstream load, does not export, and performs no bulk-system reliability function. Clear criteria are necessary to ensure that restrictions apply where equipment is deployed on, or can materially affect, the bulk-power system, while avoiding unnecessary review of equipment outside that scope.

Conclusion

EGSA supports a focused implementation framework that advances the Executive Order's national-security objectives while providing clear and predictable treatment for onsite power systems. Onsite and standby generation strengthens grid resilience by keeping hospitals, emergency services, water systems, data centers, and other critical facilities operating when the grid is disrupted. A function-based scope and streamlined treatment for standby systems, installation-level review of mixed-use equipment, consequence and connectivity screens, reliance on existing documentation, targeted mitigation, and clear restriction criteria would direct DOE's attention to equipment presenting the most relevant bulk-power-system risks without impeding the deployment and maintenance of the backup power these facilities depend on.

EGSA would welcome the opportunity to serve as a technical resource as DOE develops its criteria and review processes. Thank you for considering these comments, and please feel free to contact me to further discuss.



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