

From: [Kegan J. Gerard](#)
To: [OERegs](#)
Cc: [Caudill, Brian](#); [Marks, Kate](#)
Subject: CEII NOPR Clarification Request
Date: Friday, November 30, 2018 9:37:54 AM

Good Morning Dr. Smith,

Are you able to clarify for me whether the scope of DOE's CEII NOPR, as written, includes natural gas infrastructure? In previous forums, Assistant Secretary Walker has mentioned his intent to use such protections for natural gas infrastructure information and elements of the document allude to this, however, I am hoping you could specifically address whether natural gas infrastructure is within the intended scope.

Specifically, the part that suggests natural gas infrastructure is currently included within the scope is:

"According to the statutory definition, CEII includes information that qualifies as "critical energy infrastructure information" under existing FERC regulations, which are codified at 18 CFR 388.113(c)."

As FERC's definition of CEII includes *energy* production, generation, transportation, transmission, and distribution, my interpretation is that DOE's scope, in adopting this element of FERC's, also takes on energy infrastructure more holistically.

Thank you in advance!

Regards,

Kegan Gerard | Security, Operations, and Engineering Services Specialist

[American Gas Association](#)

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7366 | F: 202-824-9113 | kgerard@aga.org

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 70 million customers throughout the nation.