



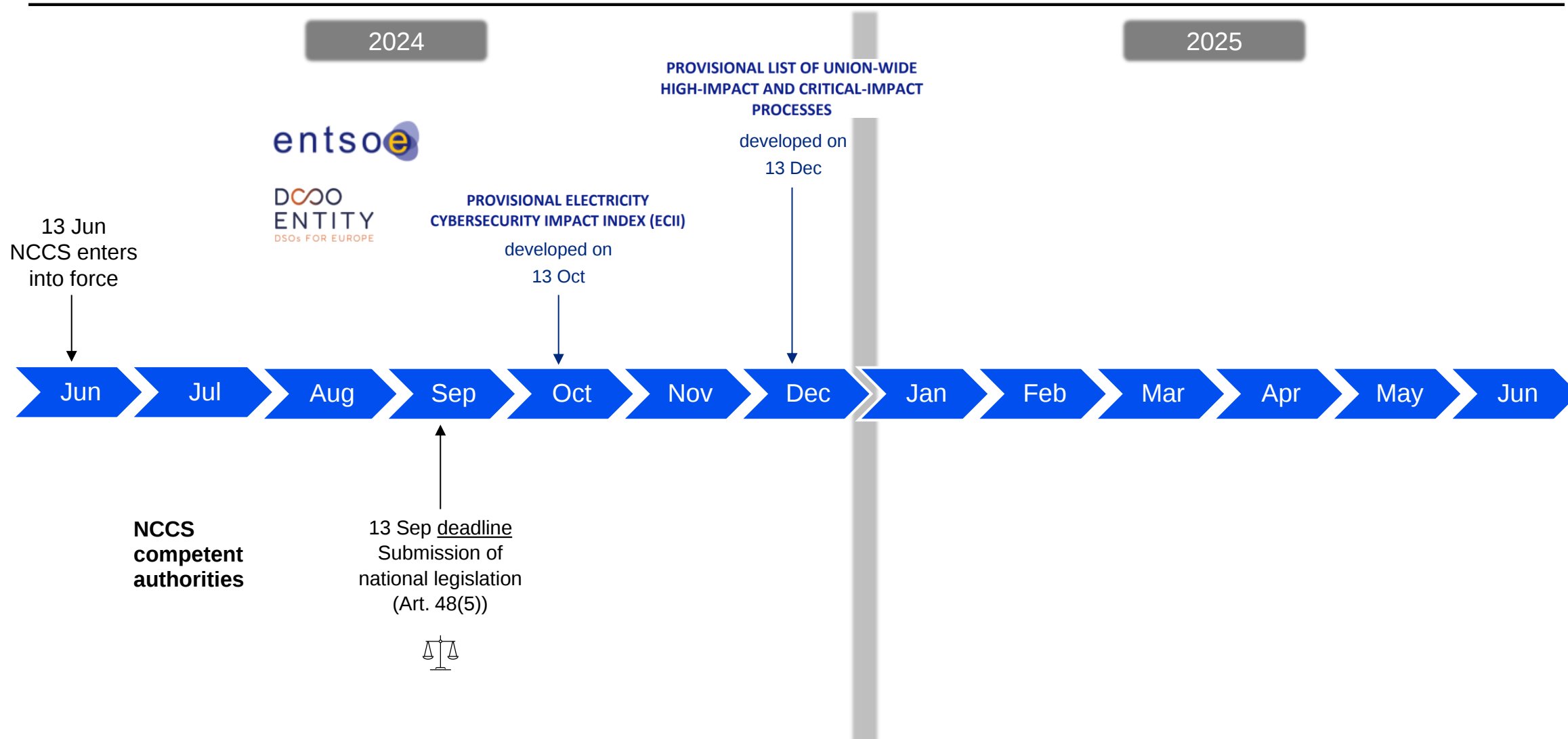
European Union Agency for the Cooperation
of Energy Regulators

European Stakeholder Committee for Cybersecurity in Electricity Sector

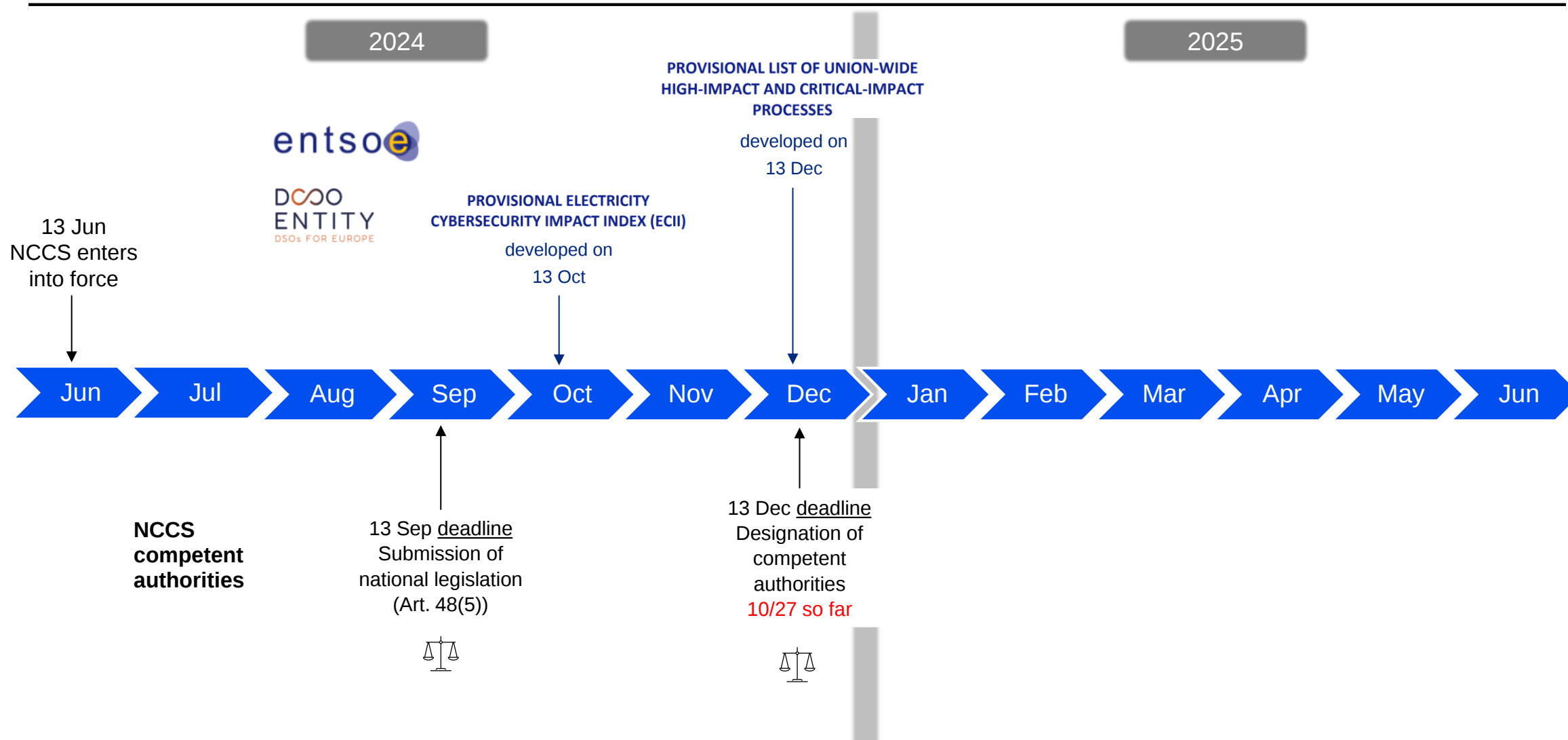
First year of implementation of
the Cybersecurity Network Code

Sławomir Bryska, Cybersecurity Policy Officer, ACER
First Cybersecurity ESC meeting, 16 October 2025

13 June 2024 – 13 June 2025 timeline (1)



13 June 2024 – 13 June 2025 timeline (2)



10 notifications of NCCS Competent Authorities

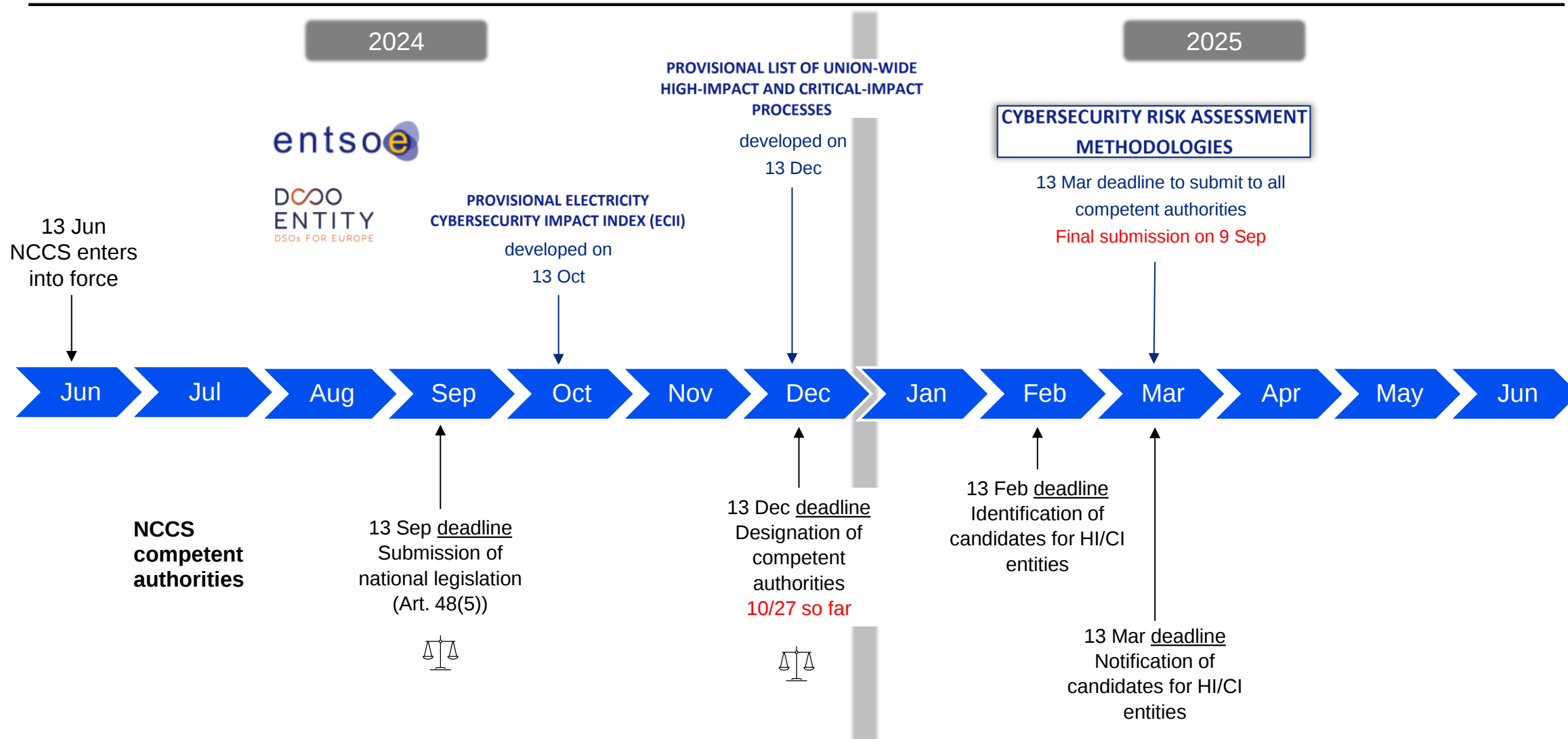
Sweden – Energy Agency
Slovakia – Regulatory Authority
Italy – Cybersecurity Agency
Portugal – Cybersecurity Agency
Estonia – Cybersecurity Agency

Denmark – Energy Agency
Belgium – Federal Public Service
Hungary – Regulatory Authority
Czechia – Cybersecurity Agency
Greece – Regulatory Authority

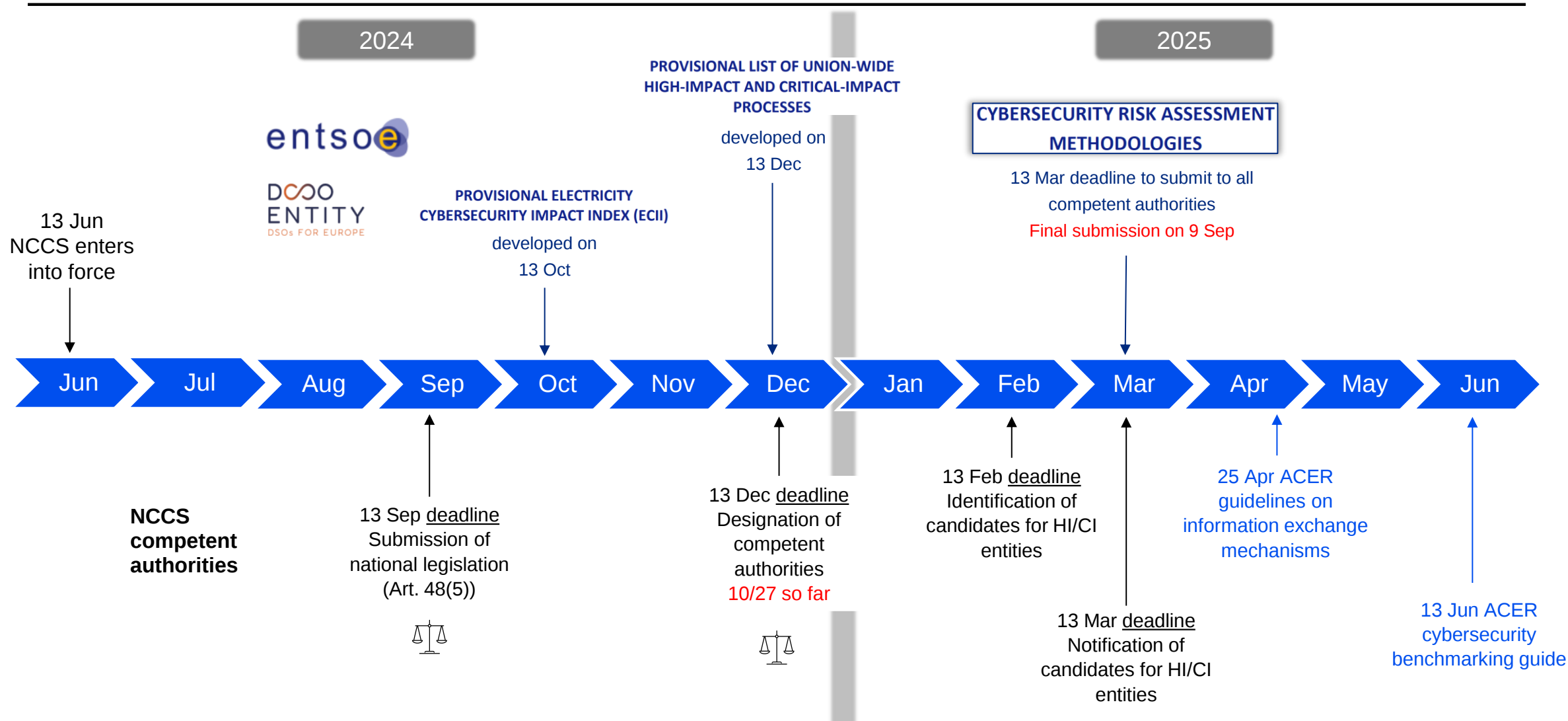
Deadline passed on 13 December 2024



13 June 2024 – 13 June 2025 timeline (3)

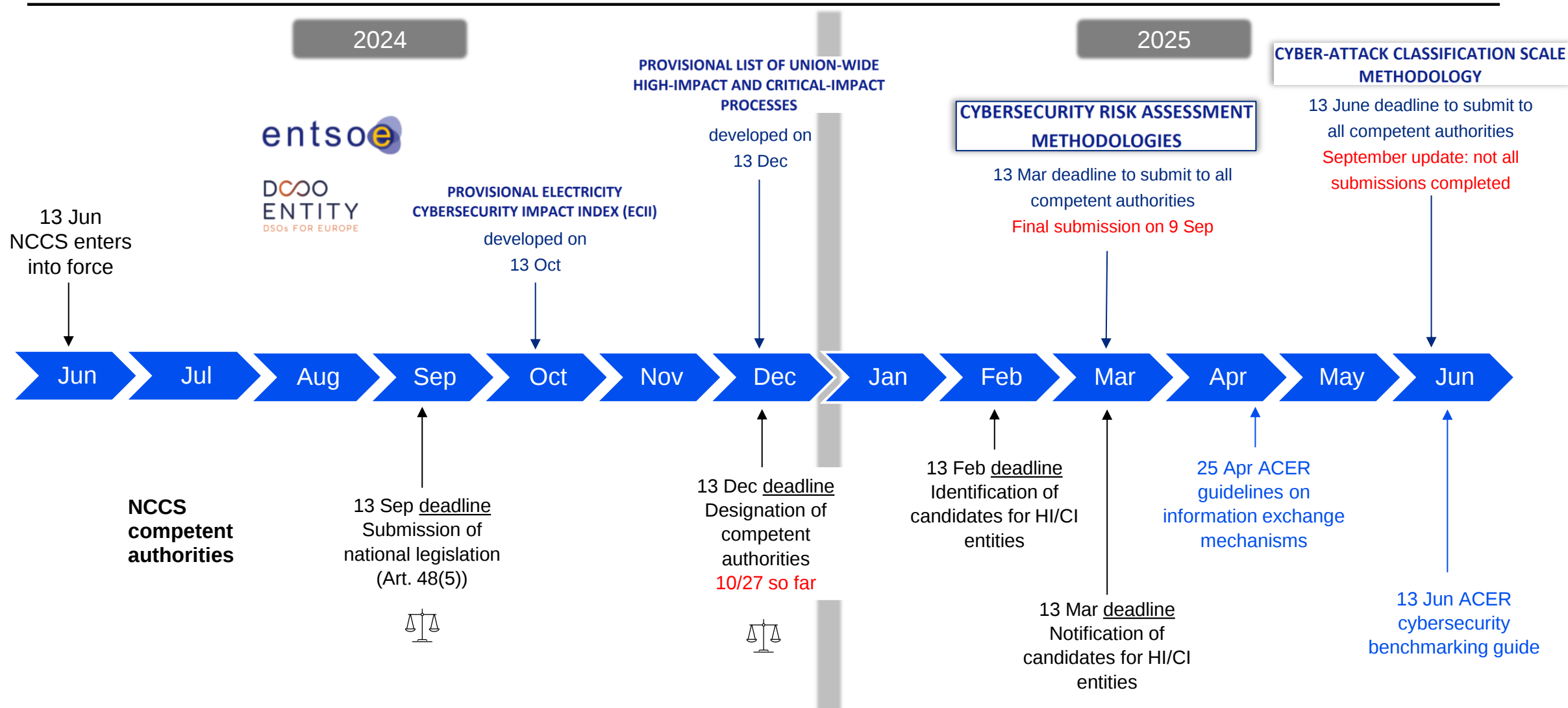


13 June 2024 – 13 June 2025 timeline (4)

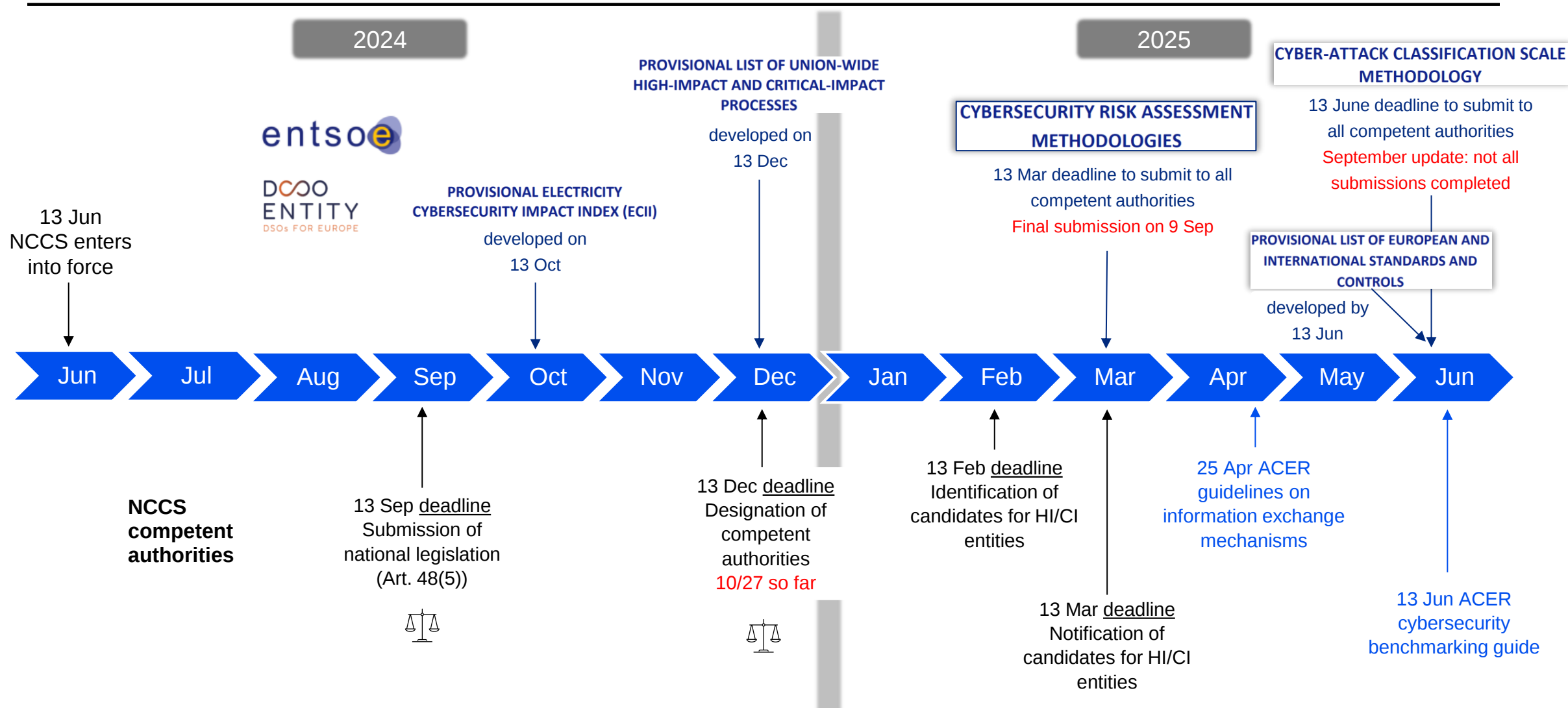




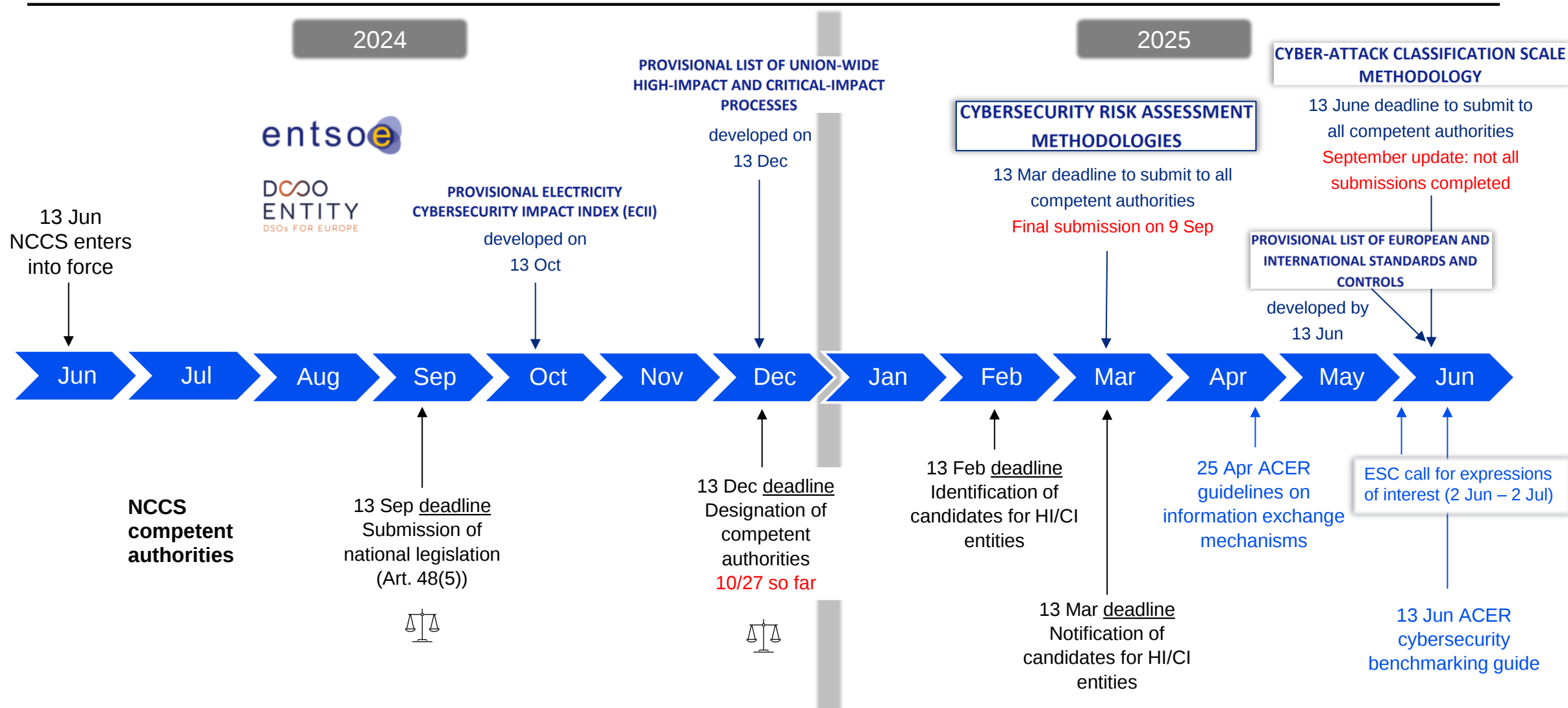
13 June 2024 – 13 June 2025 timeline (5)



13 June 2024 – 13 June 2025 timeline (6)



13 June 2024 – 13 June 2025 timeline (7)

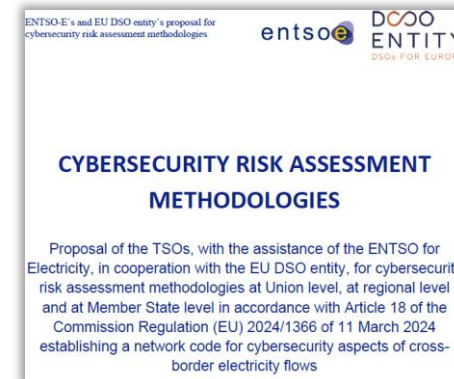


First ACER NCCS implementation update for ECG and NIS CG – 19 September 2025



Key challenges identified thus far

- Submission process of terms, conditions, methodologies and plans could be improved.
- Delays in the designation of the Competent Authorities impact governance.
- Resourcing challenges for the Competent Authorities, especially the NRAs fulfilling this role in the interim.
- This makes establishing requisite structures and processes to reach an agreement on terms, conditions, methodologies and plans (unanimity principle) more challenging.



Noteworthy silver linings

- Some National Regulatory Authorities have been very active notwithstanding the resourcing challenges.
- One of them has attempted to coordinate the process of the approval of the proposal for the Cybersecurity Risk Assessment Methodologies.
- First Competent Authority has signalled its favourable view of the proposal.
- Dialogue with Competent Authorities, including National Regulatory Authorities, has been very open and fruitful.



Thank you! Questions?

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