



TO: Lot Sixteen GR
DT: September 18, 2026
RE: Review of CESER Webinar on the Bulk-Power System Executive Order

On Wednesday, September 16, 2026, the Department of Energy's (DOE) Office of Cybersecurity, Energy Security, and Emergency Response (CESER) held a [webinar](#) to outline priority areas for stakeholder input and explain the process for submitting comments to the [Request for Information \(RFI\)](#) regarding implementation of President Trump's Executive Order (EO) 14421, titled "[Declaring a National Emergency to Secure the United States Bulk-Power System](#)."

The following memo provides an overview of the EO and a summary of the webinar's proceedings.

EO 14421 Overview:

President Trump's EO 14421, which was issued on August 26, 2026, declares a national emergency over foreign supply risks to the U.S. electric grid and applies to the U.S. bulk-power system (BPS) – defined as transmission facilities rated at 69 kilovolts or higher and generation resources necessary for system reliability – while explicitly excluding local distribution facilities. The EO extends to foreign-produced hardware not manufactured or assembled in the U.S., as well as any critical component associated with such equipment. A full list of covered infrastructure and equipment can be found [here](#).

Rather than imposing a blanket ban on all imported power equipment, EO 14421 [establishes](#) a transaction-specific screening framework administered by DOE. Regulatory screening targets any equipment linked to a "Covered Foreign Entity (COE)," which is defined as any country or persons subject to U.S. arms embargoes, sanctions under the International Traffic in Arms Regulations, or as designated by the Secretary of Energy. The EO prohibits any "acquisition, importation, transfer, or installation of any foreign-produced BPS equipment" initiated after August 26, 2026, as determined by DOE. The EO also grants DOE retroactive authority over legacy equipment acquired or installed prior to August 26, 2026, enabling DOE to require asset owners to "identify, isolate, secure, disconnect, replace, or remove such equipment."

Webinar Summary:

Opening Statements:

Alex Fitzsimmons, Associate Deputy Secretary of Energy & Senior Advisor to the Secretary, provided opening remarks and emphasized that reliable electricity is essential to national and economic security. He explained that EO 14421 was in direct response to foreign adversaries actively

seeking to exploit vulnerabilities across electric grid supply chains. He introduced **Andrew McClure**, Director at CESER, who stated that the webinar's objective was to outline the RFI structure, explain priority areas, and guide submission mechanics rather than to provide individualized legal compliance advice or render specific determinations. He explained that the RFI itself is purely an information gathering step intended to help DOE in its rulemaking process.

Comment Guidance:

McClure stated that DOE is asking for information that would help stakeholders understand and implement future requirements, as well as to provide DOE with relevant information to support the agency's overall analysis of the EO. He emphasized that the most useful input generally includes clearly stated assumptions, concrete examples, practical alternatives, and implementation constraints. He noted that respondents should distinguish established facts from estimates, current practice from planned practice, and factual analysis from a policy recommendation. McClure requested that respondents identify the perspective from which they are commenting at the beginning of a response. He asked that if a trade association or other organization is submitting aggregate information, that the organization explains the population represented, and if a view is not shared by all members, to identify that information where practicable.

RFI Specifics:

The majority of the webinar the following eight categories in which the RFI is seeking information:

- Section A: Scope, definitions, and covered transactions;
 - Covers where clearer boundaries would make implementation more consistent and more administrable, as well as help DOE understand how a proposed definition or threshold would work in practice.
 - DOE has not established final scope boundaries through the RFI, so a respondent should not answer a question by declaring that a particular product or transaction is in or out of scope. Instead, respondents should identify the applicable RFI topic and submit a written response describing the facts and the recommended treatment.
- Section B: Covered Foreign Entities and supply chain risk management;
 - Seeks evidence that can support a transparent, product-specific, and risk-informed review process. This section contains three groups of questions:
 1. Ownership and control – what sources can help evaluate foreign ownership, control, jurisdiction, direction, or influence.
 2. Supply chain depth – how far can manufacturing location, component origin, and access rights be reasonably tracked.
 3. Secure lifecycle practices – includes software and hardware, secure updates, vulnerability disclosure, remote access, and cloud and data practices.
 - A strong response should explain not only whether a practice exists, but also how it is verified, how often it is updated, and what residual risk remains as a result.
- Section C: Risk evaluation and transaction review;
 - Same as Section B.

- Section D: Existing equipment and mitigation:
 - Asks how DOE should evaluate and verify options for equipment that are already in service. Potentially relevant information includes the following: manufacturer model; serial number; production facility; installation date; connectivity; software provider; support status; and replacement lead time.
 - Respondents should identify which of these fields are normally maintained, how reliable they are, and what it would take to validate or update them.
 - The mitigation stage includes the following range of possible actions: identification; isolation; monitoring; security enhancements; disconnection; replacement; remote access restrictions; firmware changes; or removal
 - The verification stage asks how DOE or another agency could confirm that a measure was completed and remains effective.
 - For each proposed mitigation, respondents should provide the expected security benefit, implementation timeline, and direct and indirect costs.
- Section E: Licensing, mitigation measure, and prequalification:
 - Respondents should describe both the information DOE would need to make a sound decision and the steps that could prevent unnecessary delay for domestic manufacturing and procurement.
 - Respondents are asked to describe lower burden alternatives, explain how the process would work from start to finish, and how DOE could help verify compliance.
- Section F: Domestic manufacturing, secure replacements, and Federal procurement:
 - *Same as Section E.*
- Section G: Economic and regulatory analysis; and
 - *Same as Section E.*
- Section H: Implementation, information sharing, and other matters
 - *Same as Section E.*

McClure advised that respondents may select the sections where they have relevant facts or experience, and stated that there is no expectation that every respondent will answer all eight sections or every question within a section. He asked that respondents refrain from assuming that DOE can determine product design, origin, control, or supply chain risk from a brand name.

McClure advised respondents to maximize the impact of their comments by structuring submissions around six key elements: (1) identifying the specific RFI question number; (2) defining the precise operational or equipment scope; (3) providing empirical evidence or non-sensitive case studies; (4) explaining underlying methodologies and assumptions; (5) analyzing reliability and cost impacts; and (6) proposing workable regulatory alternatives.

Closing Statements:

The webinar closed with an overview of the next steps in the comment submission process. McClure reminded webinar participants that RFI responses are completely voluntary and reiterated that public

comments must be submitted by October 9, 2026. He flagged that DOE is required to issue implementing regulations within 120 days of the EO's issuance and submit recommended revisions to the Federal Acquisition Regulation within 180 days.