CYBERSECURITY ACCELERATOR PROGRAM

AMERICAN PUBLIC POWER ASSOCIATION

POLICY MANUAL

The Cybersecurity Accelerator Program (CAP) is an American Public Power Association (APPA) designation program that helps public power utilities assess and improve their proficiency in core cybersecurity practices.

This policy manual applies while APPA is running CAP as a pilot program under the Cyber Pathways cooperative agreement with the U.S. Department of Energy (DOE).

In the future, APPA will maintain CAP as a permanent program to help promote effective cybersecurity practices to the benefit of all not-for-profit, community-owned utilities that power over 2,000 towns and cities nationwide. APPA will update this manual if CAP becomes an association program.

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Policy Manual

A. STATEMENT OF PURPOSE

In April 2026, through funding provided by DOE, APPA established the Cybersecurity Accelerator Program (CAP) as a designation program. The purpose of CAP is to encourage public power utilities to assess and improve the maturity of their cybersecurity program and ability to implement core cybersecurity practices. Under the guidance of the CAP Review Panel ("CAP Panel"), the program will evolve to keep pace with changes in cybersecurity standards and best practices.

B. GENERAL

1. This policy manual sets forth the terms, procedures, and guidelines for managing CAP.

2. The CAP Panel will review this policy manual every two years and update it, as necessary, with any recommended changes to these policies.

3. APPA shall provide copies of this manual upon request and will make it available on APPA's website.

4. APPA's goal is for every member utility to attain a CAP designation.

C. CAP REVIEW PANEL

1. A panel of 10 APPA members known as the "CAP Review Panel" or "CAP Panel" will govern CAP.

    a. APPA will select a Working Group to support initial CAP development. Working Group members will automatically be nominated to serve on the first CAP Panel. If more than 10 Working Group members want to serve on the CAP Panel, APPA will select initial members based on representation requirements from C.1.b.ii. and Working Group members not chosen will automatically be nominated when a vacancy opens on the CAP Panel.

    b. APPA will follow the nomination method outlined in items i-iv to appoint members to the CAP Panel.

        i. APPA staff shall solicit nominations from the APPA membership when a panel seat needs representation.
            1. Nominees for the CAP Panel must be from an APPA member in good standing.
            2. All regular APPA utility, joint action agency (JAA), and state/regional association members are eligible to serve on the CAP Panel.
            3. APPA Corporate (Elite) Associate members are not eligible to serve on the panel.
            4. CAP Panel members must be members of APPA's Cybersecurity Defense Community (CDC).
        ii. Current CAP Panel members will select a single nominee for each panel seat requiring representation.
            1. Six of the ten panel seats are determined by a utility's size – two small-system [under 10,000 customers] panel members, two medium-system [10,000 to 75,000 customers] panel members, and two large-system [more than 75,000 customers] panel members.
            2. Two panel seats are filled by state association or JAA representatives.
            3. The final two panel seats are filled by APPA members that serve or have previously served on a panel for one of APPA's other designation programs (e.g., Reliable Public Power Provider and Smart Energy Provider).
        iii. The CAP Panel will send the chosen nominee for each panel seat to the APPA Cybersecurity Committee Chair for approval.
        iv. Incoming CAP Panel members may shadow outgoing Panel members before their term begins. However, the nominees will have no voting power until they officially become Panel members.

2. The CAP Panel shall elect one member of the Panel to serve as the CAP Panel Chair ("Chair") and one to serve as CAP Panel Vice Chair ("Vice Chair") by simple majority vote. The Chair is charged with ensuring continuity of the Panel. To achieve this, the Chair may authorize the extension of a member's term for up to one year in extenuating circumstances.

    a. If the Chair is unable to perform his or her duties at any time, the Vice Chair may act in

that role until the Chair is able to resume his or her duties or the Panel elects a new Chair.

3. The term of service on the CAP Panel is two years, and a term officially begins with the conclusion of the Cybersecurity and Technology Summit conference. Panel members may serve up to three terms. Reappointment shall be contingent upon attendance at prior panel meetings and the Cybersecurity and Technology Summit conference and participation on Panel conference calls. The Chair shall request existing Panel members indicate their interest in being reappointed.

4. There shall be an Executive Committee consisting of three Panel members to act on necessary issues between meetings. The members of this committee shall consist of the Chair, Vice Chair, and a Chair-appointed panel member. Any actions taken shall be reported at the next scheduled meeting of the full CAP Panel. The Chair and Vice Chair shall serve on the Executive Committee for their current appointed term.

    a. If the CAP Executive Committee consists of members whose terms expire at the same time and the Chair determines it necessary to ensure proper succession within the Panel and Executive Committee, the Panel may vote to elect a new member of the Executive Committee that begins their service before the original three members roll off the Panel. This additional member of the Executive Committee will shadow the current Executive Committee throughout the designation process, but they will not have voting power until the roll-off of one or more current Executive Committee members.

5. If one of the Panel members resigns or the Panel member's utility discontinues its APPA membership during the Panel member's term, the CAP Panel Chair may appoint a replacement for the remainder of their term. Once the term expires, the appointed Panel member is eligible for nomination following the methods outlined in sections C.1.b.i - C.1.b.iii. If the CAP Panel Chair chooses not to appoint a replacement, APPA staff shall put forward a call for nominations, still subject to APPA Board Chair approval. If the Chair appoints a new panel member as a replacement, the new panel member shall have voting power.

6. If a CAP Panel member is absent from two consecutive meetings, the Executive Committee will review that panel member's seat to determine if APPA should relieve the Panel member of their duties and have the CAP Panel Chair appoint an interim replacement.

7. A simple majority of sitting panel members shall constitute a quorum.

8. All CAP Panel actions shall be taken by majority vote of a quorum.

9. All panel members must sign a code of conduct and non-disclosure agreement to maintain the integrity of CAP

D. CAP SCREENING TASKFORCE

APPA will stand up a Screening Taskforce if the number of CAP applications exceeds the CAP Panel's ability to review applications in a timely manner, and additional screening is necessary. The CAP Screening Taskforce shall be composed of current and previous CAP Review Panel members. APPA will invite past CAP Panel members based on experience and availability.

E. CAP PANEL MEETINGS

1. The CAP Panel will convene in-person for a summer review meeting each year. At this meeting, the CAP Panel will review, finalize, score, and vote on the submitted CAP applications. APPA will provide logistics for virtual participation, if necessary.

2. The Panel will meet to conduct business and make application changes in conjunction with APPA's Cybersecurity and Technology Summit conference. The Panel can only make major changes to the CAP application at the end of a designation cycle.

3. CAP Panel meetings are limited to Panel members, APPA staff, and invited guests.

4. CAP Panel members who have CAP applications submitted for consideration shall not be allowed to make personal presentations on behalf of or vote for their applications. In addition, the CAP Panel will not include them in any discussion surrounding their utility's application.

5. APPA will release minutes of Panel meetings upon request, with proper redaction to protect confidential information in accordance with the non-disclosure agreement.

6. The CAP Screening Taskforce shall meet in the spring (if necessary) to score applications prior to the CAP Review Panel's summer review meeting. This meeting may occur virtually, in person, or in a hybrid setting.

F. RESPONSIBILITIES OF THE STAFF DIRECTOR AND ADMINISTRATOR

1. APPA is responsible for administering CAP. APPA shall keep the CAP Review Panel and CAP Designees informed, as appropriate, about CAP activities.

2. APPA's administrative responsibilities shall include:
    a. Ensuring review of all applications to confirm compliance with the guidelines for submittal.
    b. Providing copies of the appropriate application material to the CAP Review Panel.
    c. Notifying applicants of the outcome of their application by the CAP Review Panel in a timely fashion.
    d. Providing feedback to each CAP applicant with a breakdown of the score they earned.
    e. Promoting and marketing the CAP program.
    f. Updating and maintaining CAP materials on the APPA website.
    g. Updating and maintaining the CAP online system.

3. APPA shall ensure sufficient staff availability to support CAP, the CAP Review Panel, and CAP Designees, as necessary.

G. CAP APPLICATION FEE

There is no application fee while CAP is part of the Cyber Pathways program. In the future, APPA will charge a nonrefundable CAP application fee to cover the costs associated with processing, examining, and scoring the applications. The CAP Panel will determine the application fee, in coordination with APPA staff, at the beginning of the application year. The fee is subject to increase from the previous year.

H. GENERAL REQUIREMENTS FOR CAP APPLICATIONS

All CAP applications must meet all relevant requirements including the submission of program checklists, supplemental information and/or documentation as necessary, and application fee by the program's deadline.

Utilities may only submit one CAP application. Only one person's signature is allowed on the verification form, which must be from senior management. Utilities must submit their CAP application to APPA by the enrollment period's deadline.

CAP designations are valid for two years, aligning with the program's designation cycle. Utilities that receive a CAP designation may reapply in the middle of the cycle if they desire. Utilities that fail to receive a CAP designation may reapply the following year at no cost. APPA will only waive the application fee for reapplying utilities for the year following a failed submission.

I. SCORING CRITERIA

The scoring of each application shall be based on evaluation of the data submitted. Utility size will inform how that score may result in a designation. The scoring percentage for each section shall be as follows:

Internal Controls	30%
Cybersecurity Governance and Training	20%
Cyber Incident Response	25%
Cyber Risk Management	25%

The Panel will conduct an annual review of application questions and their applicability to each section. The Panel will consider and may approve major changes to the application questions every two years, coinciding with a new CAP application cycle. Minor/editorial changes will be allowed on an annual basis.

J. CAP DESIGNATION LEVELS

CAP participants that score above a minimum threshold can achieve either a Gold, Platinum, or Diamond designation. However, while the maturity of utility cybersecurity programs is objective, utilities of different sizes have significant disparities in the resources available to develop and improve relevant capabilities. To ensure that APPA can recognize small- and medium-sized utilities for their efforts, the scores that determine designation level are different depending on the size of the utility (typically measured by number of customers). Designations will specify the size of the utility.

	Small (<10K)	Medium (10-75K)	Large (>75K)
Diamond	90-100	95-100	98-100
Platinum	78-<90	85-<95	90-<98
Gold	66-<78	75-<85	80-<90

Gold designations go to utilities that demonstrate core cybersecurity practices. Platinum designations go to utilities that demonstrate cybersecurity programs well above core practices. Diamond designations go to utilities that demonstrate cybersecurity programs above and beyond core practices.

Should a utility request a reconsideration after its final score has been determined, the Executive Committee will review any additional information provided by the applicant.

Should the utility merit additional points, an Executive Committee vote will finalize any scoring adjustments. The Executive Committee will report any reconsiderations and results to the CAP Panel.

Reconsideration requests for a given year will be accepted up to 30 days after APPA releases designations.

Applicants that receive a CAP designation will be announced at the Cybersecurity and Technology Summit.

K. CAP LOGO USE

APPA developed CAP Logo Guidelines to assure the proper and consistent use of the CAP logo. The logo is for use by utilities that have formally received a CAP designation. Utilities may only use the logo if they are current CAP designees.

The guidelines for use of the CAP logo are available upon request.