

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**Joint Staff White Paper on Notices of  
Penalty Pertaining to Violations of Critical  
Infrastructure Protection Reliability Standards**

**Docket No. AD19-18-000**

**Comments on Transparency**

Submitted to FERC on 9-17-2019

Dennis D. Hunt, a private citizen, respectfully submits comments on FERC Docket No. AD19-18-000, Joint Staff White Paper on Notices of Penalty Pertaining to Violations of Critical Infrastructure Protection Reliability Standards.

My background is United States Army Special Forces special operator in Vietnam and a Program Manager with the Department of the Treasury, Bureau of Engraving and Printing in Washington, DC. Having taken the oath to protect our country from enemies both foreign and domestic twice, I understand how important it is to get this important right.

I am familiar with the "White Paper" proposed by the Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC) and am glad to see the effort to make things better when it comes to keeping our infrastructure safe from attack.

It is critical that power companies found to be in violation of CIP standards be made public. Invisibility only breeds contempt for the regulations and minimizes the importance doing better the next time to secure our domestic power from unwanted or unknown attack. We need to know who, what, where and why it happened as well as the fix.

I am also familiar with the research, analysis, and public dissemination of information about CIP violators conducted by retired U.S. Army Command Sergeant Major Michael Mabee as well as the "Alternate Proposal" he submitted to FERC on 3 September 2019. I am in full agreement with Command Sergeant Major Michael Mabee's "Alternate Proposal" and would urge you to implement his suggestions to the fullest. We need what he is suggesting and, in my opinion, the current Infrastructure Protection Reliability Standard falls far short of doing that.

Respectfully submitted by: Dennis D. Hunt

Document Content(s)

FERC Letter.PDF.....1-1