

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

Joint Staff White Paper on Notices of)	
Penalty Pertaining to Violations of Critical)	Docket No. AD19-18-000
Infrastructure Protection Reliability Standards)	

Comments on Transparency

Submitted to FERC on September 21, 2019

I am a private citizen, respectfully submitting 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 that I am a retired professional engineer who worked for many years in the oil and process industries. I have held numerous leadership positions including the development of \$ multimillion product lines and capital plant. I am familiar with quality and safety standards and the need for reliable and safe operation.

I am actively involved with a number of grid protection advocacy groups including Secure the Grid Coalition and Infragard EMP Special Interest Group. Cyber/Hacking attacks, particularly where a 'worm' is involved, are a serious threat. A coordinated cyber event, which could be combined with another attack mode such as that from an EMP, could be devastating to our nation. Every effort must be made to prevent such an occurrence.

I have read the "White Paper" proposed by the Federal Energy Regulatory Commission and the North American Electric Reliability Corporation and applaud the moves towards making delinquent power company's more accountable.

I am aware of 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 understand the concerns expressed by FERC about divulging too much information about vulnerabilities to our potential adversaries. However, on balance I believe that the greater transparency proposed by CSM Mabee will encourage more diligence from the power industry both in terms of avoiding violations in the first place and in rectifying any that do arise expeditiously.

With respect,



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