

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION
Docket No. AD19-18-000**

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

Comments on Transparency

Submitted by Ken Sletten on Monday 23 September 2019.

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My name is Ken Sletten. I was born a United States citizen in North Dakota, and am currently retired at the ND family farm where I grew up. Many years ago I received a 4-year degree in electrical engineering from North Dakota State University. Currently I am the ND State Director for the EMP Task Force, which has world-class EMP expert Dr. Peter V. Pry as its executive director.

Since I retired from my software engineering job just over 10 years ago, I have been focused on becoming better informed regarding technical details of the serious threats to our vital national electrical grid from solar storm electromagnetic pulse (EMP), nuclear EMP, and terrorists. Near the end of 2016, at the request of one of my North Dakota state legislators, I drafted the original version of what ended up being adopted in 2017 as ND State House Concurrent Resolution 3010 (HCR-3010). HCR-3010 recognized the need for the State of North Dakota and the entire United States to undertake serious responsible measures to harden our commercial electric grid against these multiple serious threats.

I find it astounding (and very disturbing) that even with declassification and publication of the very detailed Congressional EMP Commission Reports

in 2004 and 2008, very little has actually been done to mitigate these serious threats to our national electric grid. It is especially disturbing to know that while electric power companies are often in violation of agreed Critical Infrastructure Protection (CIP) Reliability Standards, there is still a serious lack of transparency in the current Notice of Penalty (NOP) reporting process. The public absolutely must get enough information to be confident our electric grid is well protected. But with the current system that is NOT happening, because while FERC has the necessary information, it designates it as confidential and therefore does NOT make it publicly available. FERC does not even make public the names of companies that violate the standard. This is unacceptable.

At the point, instead of making additional detailed personal comments on this critically important national issue, I will just say that I fully endorse and strongly support the excellent detailed comments and serious Alternate Proposal on this issue by Mr. Michael Mabee, that were submitted to FERC on 3 September 2019. Mr. Mabee's Alternate Proposal is detailed, clear cut, and actionable; and has already garnered support from many high-level technical and national security experts. Failing to adopt Mr. Mabee's Alternate Proposal will effectively enable continuation of a corporate culture in our electric power industry that is much less mindful of security and system resilience than it needs to be. Mr. Mabee's proposal is of course available online, with a long and detailed list of footnotes, at:

<https://michaelmabee.info/white-paper/>

Respectfully submitted,

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