

**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 09/24/19

My name is Terri Timmcke, currently residing in Kenner, Louisiana, and I respectfully submit 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.

I am a private citizen, however I did serve our country for 15 years as an Officer in the United States Navy. I have a STEM degree (BSN) and an MA degree in Human Resources Management with an emphasis on Health Care Administration. As such, I am deeply concerned that thus far, no one (public, private , or political) has been successful in securing our electrical grid enough to prevent a catastrophic failure due to an EMP assault, whether natural or manmade or a massive cyber security attack. A total Grid failure would result in massive loss of life and leave our nation susceptible to military attacks by enemy nations. This long standing failure to secure our Grid is unacceptable.

Through my affiliation with the Center for Security Policy and their Secure the Grid Coalition, I have been made aware of efforts by the NERC and FERC to secure the Grid and have read the recent White paper on this topic. <https://www.ferc.gov/media/news-releases/2019/2019-3/AD19-18-000-Joint-White-Paper-NoFR.pdf>

I appreciate that renewed efforts are in the works but am concerned that the proposal does not go far enough in requiring actions, especially from Electric Company providers, to correct the deficiencies in our Grid in a TIMELY manner. I consider this a National Security emergency and cannot accept the years of "snail's pace" progress. As a private citizen, I feel I am "in the dark" as to what my local/regional Electric Companies are doing, if anything, to secure the Grid. Therefore, I propose more transparency and also accountability for Electrical Companies action or inaction ,especially CIP violations, by making this information available to the public so we can put pressure on them and public officials in our local community.

I would like to suggest that you adopt the recommendations of retired U.S. Army Command Sergeant Major Michael Mabee ,of the Secure the Grid Coalition, as well as the "Alternate Proposal" he submitted to FERC on 3 September 2019.

Some of the recommendations listed below:

For the Department of Energy (DOE):

- o List a root cause for every disturbance reported on each OE-417;
- o Ensure accuracy in the "Number of Customers Affected" block on the OE-417; and
- o Convey the same information on the OE-417 and the NERC reliability reports (since DOE owns the OE-417, ask NERC to address the OE-417 data in its annual reliability reports).

- For the Federal Energy Regulatory Commission (FERC):
 - o Convey the same information on the OE-417s and the NERC reliability reports (as NERC's regulator, ask NERC to address the OE-417 data in its annual reliability reports); and
 - o Provide transparency and disclosure of the names of CIP violators in order to incentivize the industry to fix the longstanding physical and cybersecurity weaknesses that plague the electric grid.
- For the North American Electric Reliability Corporation (NERC):
 - o Understand that NERC is not the industry's champion, but rather its regulator;
 - o Disclose the names of the CIP violators once violations are mitigated, which would incentivize the industry to improve cyber and physical security; and
 - o Discuss and analyze the OE-417 data in NERC's annual reliability reports.
- For Congress:
 - o Develop legislation to ensure that the public and Congress receive reliable and accurate data on the threats to the electric grid.

For national security of critical infrastructure, the industry must hold some accountability for physical security and cybersecurity.

These recommendations from Michael Mabry seem to strike the required balance between enough transparency to facilitate rapid progress toward securing our Grid without releasing critical infrastructure information deficiencies that could be used by our enemies and others who would do us harm.

FERC and NERC have a unique opportunity to enact new policies NOW that could SECURE OUR ELECTRICAL GRID in the very near future. Both can assist the DOE and Congress in taking the necessary steps to help... as listed above.

I pray you will do it.

Respectfully submitted,

Terri Timmcke

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