

TASK FORCE ON NATIONAL AND HOMELAND SECURITY



September 24, 2019

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**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 24, 2019

The Task Force on National and Homeland Security, as a 501 (c)(3) educational and outreach organization committed to protecting and securing the US Electrical Power Grid, 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 (CIP) Reliability Standards.

The Task Force is dedicated to a leadership role in securing the nation's electrical power grid.

We are familiar with the *Joint Staff White Paper* proposed by the Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC) and it prompted us to write to you today.

Protecting the nation's power grid from all hazards is critical; therefore, this necessitates that we have full disclosure, including names, fines, notices and explanations from any organization or commercial entity as stated in the "Alternative Proposal" by retired U.S. Army Command Sergeant Major Michael Mabee.

We are familiar with the research, analysis, and public dissemination of information about CIP violators contained in **Mabee's Alternative Proposal** submitted to FERC on 3 September 2019. This information as to where, when, why and

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to what extent violations from officials within power companies who have disrupted the nation's power grid should be made public with the exception of real national security interests.

In Michael Mabee's **Alternative Proposal**, he expressed keen awareness that violators be protected from disclosing certain sensitive details that would have national security implications.

The double-edged sword of disclosure and the need to protect security must be balanced.

Respectfully submitted on behalf of the  
Task Force on National and Homeland Security by:

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