

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 9/26/2019

Alyssa A. Lappen, 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 a retired financial journalist with additional background in terrorism and terror-financing. During 45 years of professional journalism, at Forbes, Institutional Investor, Working Woman, Corporate Finance and other publications, I periodically covered every industry in the U.S., including the electrical power generation industry. I also covered terrorism and terror-financing and am very familiar with the plans of foreign states and entities to compromise our electrical grid.

I represent myself and my extended family.

I am familiar with the "White Paper" proposed by the Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC).

As someone who has covered the electric and electrical power generation industries, I am not at all sanguine that the industries are truthful when they claim that we already have full transparency on electrical power companies or that they are fully compliant with rules that require the reportage of problems and violations of rules. One need look no further than the forest fires ignited by unserved and unattended PG&E electrical towers and lines, a large number of which are roughly 100 years old and have not been serviced or repaired in decades. These problems, for example, were never disclosed and would not have been discovered but for the rampant fires that destroyed whole communities, vast stretches of private property and public land and property, and killed dozens of people.

Obviously, to protect lives and property, full disclosure is required and 100 percent compliance is critical. No one wants to see property destroyed or lives ruined or ended due to industry negligence, but that is what we got as a result of PG&E negligence and failure to comply with transparency (for example).

But maintenance of electric towers and lines, not done by PG&E, is not the sole issue of concern here. We must ALSO be very concerned about the nation's electrical power substations, which have very little security, and whose private owners have concerned themselves more with the costs to investors than about costs to society of their failures to fully secure these substations. Simultaneous attacks on and failures of even a handful of electrical substations could easily cascade into failure of the entire U.S. Electrical grid, which is the lifeline for countless hospitals, schools, water supply systems, natural gas supply systems, the entire U.S. Banking system, financial markets, transportation networks and food supply systems.

The simultaneous failures of all these systems due to an electrical grid meltdown could potentially cause the loss of hundreds of millions of lives, as electrical substations cannot be replaced and retrofitted quickly or easily now that many of the parts required are not even manufactured in the U.S.

For all the above reasons, transparency as regards the compliance of electric power companies as regards their obligations to protect critical infrastructure cannot and should not be left to a system of "self-governance."

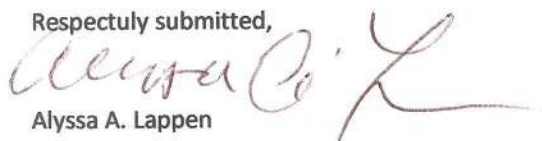
Self-governance in any industry as critical as this is not a safe or desirable status-quo. And when the electrical power industry says that it can manage its own affairs, that is the most self-serving and untrustworthy statement imaginable. The lives of the entire U.S. Citizenry depends on transparency, which we DO NOT HAVE NOW, notwithstanding industry claims to the contrary.

I am 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. As a U.S. Serviceman charged with the protection of the American public, Ser. Maj. Mabee clearly understands the need for an immediate alternative and its imposition as soon as practicable.

This alternative proposal does NOT pose additional risks to the electric power industry. If anything, it protects the industry from its own folly and short-sightedness, which focuses now, and has for several decades focused almost entirely on short-term economic results and returns on equity and investment, not on the safety and long-term health of the industry and the nation at large.

No industry upon which the U.S. Economy depends as critically as it does on the electrical power industry should be left to its own devices, or be allowed to pretend that it has been transparent, when clearly (as evidenced by the devastation caused by PG&E's lack of disclosure and maintenance of its equipment) it has not been transparent and has put whole regions and the entire nation seriously at risk.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Alyssa A. Lappen", with a large, stylized flourish extending to the right.

Alyssa A. Lappen

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