**Instructions for filing a Comment to FERC for Increased Transparency**

**Background:**

* On August 27, 2019 the staffs of the Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC) [published](https://michaelmabee.info/wp-content/uploads/2019/08/2019-08-27-Staff-White-Paper.pdf) a white paper and opened an administrative docket for public comment. The white paper proposes ending the longstanding Critical Infrastructure Protection (CIP) [**violator coverup**](https://michaelmabee.info/cip-coverup/). While this is a great leap forward for the Commission and NERC, the white paper proposal would not give the public, investors, Congress and other regulators enough information to evaluate CIP violators and the regulatory system.
* Michael Mabee, author of the Civil Defense Book, and member of the Secure The Grid Coalition, has filed a comment in this docket, providing an alternate proposal that would enable more appropriate transparency in the naming of CIP violators.
* Members of the Secure the Grid Coalition are telling FERC that we support the alternate proposal submitted by Michael Mabee on September 3, 2019 and that the public has the right to know the names of companies that violate the regulatory standards and we need sufficient details to make sure that the regulatory system is working.
* **The deadline to file on this docket is September 26, 2019** so write your letter today and submit it [online](https://www.ferc.gov/docs-filing/efiling.asp?csrt=6486212260201646002) to FERC Docket Number AD19-18-000, or mail it in to FERC (Be sure to include the Docket Number in your letter).
* [**Submit to FERC online HERE**](https://www.ferc.gov/docs-filing/efiling.asp?csrt=6486212260201646002) (See detailed instructions below)

or, submit by mail:

* Federal Energy Regulatory Commission  
  Kimberly D. Bose, Secretary  
  ATTN: Docket No. AD19-18-000  
  888 First Street, NE  
  Washington, DC 20426

**Detailed Filing Instructions:**

Go to FERC’s website: <https://www.ferc.gov/>

* Hover over the “Documents & Filings” section
* Go to “E-Register” and register yourself by following the intuitive step by step process that includes an email verification and an assignment of a FERC ID number.
* Draft a letter using the exact formatting below.
* The example text provided below can form a basis for your own arguments for more transparency. PLEASE DO NOT Copy/Paste the text below. Please articulate your own thoughts on the importance of transparency in a democracy.
* Save your letter as a PDF with your signature.

---------EXAMPLE: Use the below TEMPLATE but do not copy verbatim – Write Your Own Thoughts------------------

**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 \_\_\_\_\_Date\_\_\_\_\_

\_\_ Your Name\_\_\_, 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\_\_\_ [provide background information about yourself if it is relevant. For example, if you work in an industry regulated by the federal government (food, drugs, transportation, aviation, finance, etc.) you can later explain how your industry is not allowed obscurity when it comes to violating the government’s rules.]

I represent \_\_\_\_\_[if you are a member of and/or represent any organizations, this is helpful to list]

I am familiar with the “White Paper” proposed by the Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC) \_\_\_\_[you should demonstrate that you have read the white paper]

List reasons why you believe transparency is important when it comes to determining whether or not electric power companies are complying with their obligations to protect the critical infrastructure.

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.\_\_\_[In your own words, you should demonstrate that you have read Mike’s alternate proposal, whether or not you believe that Mike is qualified to provide such a proposal.]

List your beliefs about the value of Mike’s proposal and whether or not it poses additional security risks for the industry or whether it would enable the type of transparency that would change corporate behavior in the electric power industry to take security more seriously.

List any other ideas you have that could help with the issue of transparency and the security of the electric grid.

Respectfully submitted by: (insert signature below)

---------See filing instructions below-------------------

* Go back to the FERC website and go to the FERC Online section
  + <https://www.ferc.gov/docs-filing/ferconline.asp>
  + Create an account and/or Login with your credentials
  + Click on “eFiling”
  + Go to: General —> Comment on Rulemaking —> Comment
    - On the next screen enter docket number: **AD19-18-000**. Then follow the prompts to upload your document.
  + Attach the PDF (Filing is free.)
  + See screenshots below:



 



