

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 October 22, 2019

Eunie Smith, 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.

I have served as President of National Eagle Forum since 2016. Eagle Forum is a nationwide organization, working to ensure Americans are made aware and have access to public policy issues that will impact their families on the local, state and national levels.

Keeping America's electrical grid safe from attack is a major issue impacting all Americans. We have become aware of the threat to America's electric grid, which was magnified by the Chinese when they showcased earlier this month, a massive military parade of weapons against which the United States has no deployed defense. The Communist government proudly exhibited an inventory of ninety DF-41 intercontinental ballistic missiles, each containing ten nuclear warheads – enough to destroy America's strategic military targets almost two-times over. However, if warheads were exploded in the atmosphere to take down America's electric grid and paralyze our nation, there would be no need for ground attacks.

In the 1970's, as a state Eagle Forum leader, I participated in national defense briefings at the American Security Council under Phyllis Schlafly. I advocated for the defense of the United States from incoming ballistic missiles via High Frontier even before President Ronald Reagan called for such a missile defense system ("Star Wars"). It was also during this time period when

Israel illustrated that missile defense can work to protect its citizens.

We have been in consultation with other organizations who share our concern that citizens are currently vulnerable to EMP attacks or incidents. We are familiar with the “White Paper” proposed by the Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC) and are encouraged to see the efforts being made to ensure our infrastructure is protected but more needs to be done. Therefore, we urge you to read and consider U.S. Army Command Sergeant Major Michael Mabee’s “Alternate Proposal” submitted to FERC on 3 September 2019. Eagle Forum agrees with CSM Mabee’s proposals and believes that your organization should consider his recommendations.

Every aspect of our daily life is tied to having access to reliable electricity and it is imperative that your agency ensures, the country continues to have reliable access. It is critical that the electric companies who are found to be in violation of CIP standards be made public.

Transparency is the key to good governance and ensures that the public knows and understands what is happening when security issues arise regarding our critical infrastructure.

I speak for Eagle Forum, as well as myself, when I say that the current vulnerabilities to attack of our grid is concerning and your organization has the responsibility to ensure that we, the American people, know what is happening with the nation’s electrical grid. Lastly, FERC’s responsibility is to ensure our electrical infrastructure is safe, secure and in the process, you may just be saving millions of American lives.

Respectfully submitted by:

Eunie Smith
President, National Eagle Forum
State President, Alabama Eagle Forum

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