

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Joint Staff White Paper on Notices of)
Penalty Pertaining to Violations of Critical)
Infrastructure Protection Reliability Standards)

Docket No. AD19-18-000

Comments on Transparency

Submitted to FERC on October 23, 2019

Theresa Hubbard, 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 am a retired Commander in the United States Coast Guard and a veteran of Port Security Operations, serving worldwide including the Persian Gulf. I have served in countries where the electrical grid was working at a 60 to 70% capacity at best. Observing first hand children being educated in buildings without heat and electricity, this would not nor should it be acceptable in America. Additionally, I watched as a first responder during Hurricane Katrina, how people struggled to deal with days to weeks of loss of electricity and basic everyday necessities. The citizens of the Gulf Coast were not ready then and are certainly not ready now, especially if there were a long-term loss of months to years of electricity.

Since 2013, I have served on the board of Eagle Forum, as their Counter-Terrorism Chairman. 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 and we have decided to educate ourselves as an organization, and as many Americans

as possible. I/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.

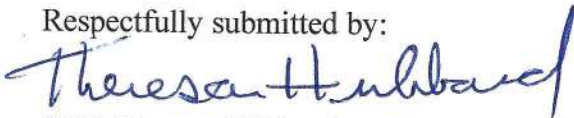
Every aspect of our daily life is tied to having access to reliable electricity and it is imperative that your agency ensures, the country continues to have reliable access. It is critical that the electric companies who are found to be in violation of CIP standards be made public.

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.

No one is more versed on the CIP issue than U.S. Army Command Sergeant Major Michael Mabee. He has even submitted an "Alternate Proposal" to FERC on 3 September 2019. Eagle Forum and I are in full agreement with CSM Mabee's, proposal and would encourage your organization to thoughtfully consider his recommendations.

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 and secure and, in the process, you will be saving millions of American lives.

Respectfully submitted by:

A handwritten signature in blue ink that reads "Theresa Hubbard". The signature is written in a cursive style with a large initial 'T'.

CDR Theresa Hubbard
USCGR (ret)
Eagle Forum Chair Member