

**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 10/27/19

Gabriel Frank, 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 private citizen who has been researching the interconnectedness and vulnerability of the North American electric grid for several years, and I believe its potential large-scale collapse or failure to be one of the greatest threats this country faces. I am not alone in believing that an adversary or large-scale natural disaster could wreak havoc on this aging system, jeopardizing the survival of many other critical infrastructures such as water treatment, hospitals, food infrastructure, natural gas, and interstate trucking, all of which are vital to sustaining the lives of the vast majority of Americans.

I am familiar with the “White Paper” proposed by the Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC). While I commend FERC and NERC’s efforts to provide for greater transparency in regard to critical infrastructure protection, I believe that the guidelines within this paper are not comprehensive enough, and can, in fact, lead to the same coverups of utilities violating critical infrastructure protection standards and regulations seen before.

In a democracy, the government and its associated bodies are specifically designed to serve the interests and well-being of those who elect its members, namely, the American people. Continuing to obfuscate the names of the violators of critical infrastructure protection guidelines, or enacting legislation that is not comprehensive enough to expose said infringements on regulatory authority invites the exploitation of the electric grid’s vulnerabilities, jeopardizing hundreds of millions of lives.

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. Mr. Mabee’s proposal would allow for a greater degree of transparency in exposing the names of the violators of FERC’s regulatory guidelines, and in turn could bring about stronger, more comprehensive, and safer regulations of electric grid security, ensuring a future where a crippling attack on the electric grid jeopardizing the lives of millions of Americans a thing of the past.

Mr. Mabee’s background in civil and military emergency preparedness, and the extensive, unparalleled research he has conducted regarding the vulnerability of the electric grid and its causes, as well as its remedies make him uniquely qualified to submit such a proposal, which would satisfy the aforementioned need for transparency in ensuring a democracy’s survival, and saving the lives of millions. I truly hope that the appropriate entities take Mr. Mabee’s comments into consideration.

Respectfully submitted by: Gabriel Frank of Belle Harbor, New York

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