

**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)**

Comments on Transparency

October 26, 2019

My name is Joseph Voglund and I am an ordinary citizen. Thank you for the opportunity to make comments. This letter is to respectfully submit my remarks 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 audiologist. My profession is licensed by state legislatures in most states. The product associated with audiology is the hearing aid and it is regulated by the Food and Drug Administration. Audiology programs and audiologists themselves are also tested and sometimes certified by self-governing organizations. Everything about audiology and audiologists can be easily found out just by simple internet searches or by calls to college programs and to professional organizations. Those not keeping up the standards have public notices of revoked licenses. We audiologists take pride in this transparency. It is best for us and for our patients.

Recently I was made aware of the White Paper proposal written by the Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC). I did an internet search, found the paper and read all twelve pages of it.

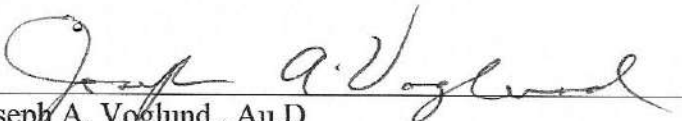
Transparency in this matter is of utmost importance. How else will the electric power companies be checked to make sure of compliance with protecting the critical infrastructure? This is their obligation to us as citizens and as shareholders in their stocks. Perhaps when every city had its own electric generator and the grid was just a dream and before the advent of computers, attacks were not effective in bringing down the electric system. That is not the case now where electricity on which our way of life depends is centralized and vulnerable. Enemies of the grid are not the only threat. Weather is another. Line maintenance (tree trimming, etc.) is yet another. Even nature can do damage (sun storms, fires).

Retired U.S. Army Command Sergeant Major Michael Mabee wrote and submitted to FERC on September 3, 2019 an "Alternate Proposal. I have read it and am most impressed by his research. He is most qualified to present such a proposal.

Sergeant Mabee's proposal gave a list of the information that should be included and why it should be so. Capsulizing what he means is that the public and the congress need to know the names of the violators and why. Knowing the names holds entities accountable. There is no

malice intended, just help getting violations corrected. The other information he asks for helps with statistical studies to determine what to do if patterns develop. He demonstrates that no information has any value for saboteurs. Please consider adopting his proposal.

Again, I appreciate the opportunity to put forth my remarks. As a citizen, I'm concerned about safety in the United States for myself, my family and for all citizens. I have always been one to believe that what is good for the individual is good for business and government and vice versa. Only in a free and safe America under God can ideas be discussed and the best outcome discovered.


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