

UNITED STATES OF AMERICAN 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

Eric Richter, a private citizen, respectfully submits this eFiling in support of an alternative proposal 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 recently learned that there is little transparency regarding failure of utilities to comply with mandatory Critical Infrastructure Protection (CIP) standards. The Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC) have proposed seeking more transparency in Notice of Penalty (NOP) filings. While their proposal is a step in the right direction, I believe more can be done.

I urge you to adopt the comments and alternate proposal of Michael Mabee, submitted to FERC on September 3, 2019. In his proposal he is urging that not only future violations receive more transparency, but also past violations.

We Americans undeservedly are not told the reality of how fragile our power grid is and will sadly experience untold hardships and even death for many should the grid go down because of the failure of industry and government to work together for the betterment of the people.

We need to know the names of companies that violate the regulatory standards and require the necessary details to verify the regulatory system is working. California is the most recent example that the system is woefully inadequate.

I worked in the commercial and military space satellite industry for 30 years, which is highly regulated. I and the companies that employed me were required to be accountable for the products and services we provided. I'm shocked that the power industry, which is so critical to health of the American economy, can escape similar scrutiny.

As Mr. Mabee writes, we need searchable databases with plain English explanations of violations and mitigation activity as well as who was involved. In my industrial experience, I often was required to perform root cause and failure analysis. The tools Mr. Mabee suggests are necessary if the industry is ever to be improved.

Sincerely,



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