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BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

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**Joint Staff White Paper on Notices of
Penalty Pertaining to Violations of Critical
No. AD19-18-000
Infrastructure Protection Reliability Standards)**

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Docket

Comments on Transparency

Submitted to FERC via first class mail on September 26, 2019

Sara Wood, 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.

My background is that I am a mother of four beautiful children, a wife, daughter, sister, friend, Catholic, attorney and proud American citizen. I am a member of the Republican Professional Women of St. Tammany and the Greater New Orleans Tea Party. However, I represent my family and myself in commenting on this NOP. I try to be a vigilant citizen seeking the restoration of our Constitutional Republic by reducing the regulatory state in this country and limiting further expansion of our federal government because of the detriment to federalism and individual liberty as originally protected by our Constitution.

I am an everyday American who believes that unelected bureaucrats and special interest lobbyists are costly menaces to our Constitutional Republic but since shutting them down seems a far off possibility, I push for accountability and transparency. Why? Because it seems that the only ones living the dream of life, liberty and the pursuit of happiness and self-regulation, without government interference, seem to be those responsible for our nation's electrical grids and other industries and leftists non-governmental organizations and foundations that can afford to keep up and basically control the administrative state and our Congress through lobbying efforts. Why? Well because getting in bed with government and unfairly influencing it, even with cost of regulation, is better than the effects of limited government in a pure capitalist society. Sucking up and controlling the administrative state keeps innovation and competition from ever being a real tool to a better product or service so these established industries/big business/big labor. And for the leftists, well some variation of Marxism is their goal and they use the administrative state to destroy the free market economy in order to advance that goal. So unlike the Squad, the Bernie Sanders and Elizabeth Warrens of this country, I see the problems caused by fascists but I see the solution as one that drastically reduces the size of government; thus minimizing the power these collectivists (industrial/corporate size fascists and big labor socialists) have over our government and thus over our right to live truly free.

So you might imagine the shock when recently I became familiar with the "White Paper" proposed by the Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC). It was reviewed as part of a meeting held by the Center for Security policy and certain links provided therein. I cannot believe that we even have to comment on this. All violators of the Critical Infrastructure Protections should ALWAYS have been made public. Transparency is key to any industry and must be for those responsible for the safety of our electrical grid. From what I understand, these companies overall spend about 40% MORE on lobbying and paying for the right friends to serve in DC than they incur in fines per CIP violation. It doesn't take rocket science to see that the fines are not a deterrent. Thus the only deterrent is PUBLIC SCRUTINY. This

is a no-brainer. Post 9-11, life in America is drastically changed. Americans have little to no privacy, however protection of our electrical grids has not changed as drastically as it should. As a regular everyday citizen, I wonder why government would invade individual privacy to the extent it does under the Patriot Act for the sake of national security, but fail to ADEQUATE AND FULLY PROTECT some really obvious aspects; such as our electrical grid and those responsible for it. Do these companies and the money they spend on lobbying and political contributions hinder those efforts? Well I don't know but it is the job of this commission to ensure that it does not in my opinion.

I would like to recommend that you review and become familiar with the research, analysis, and 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. Particularly, the streamlining efforts and disclosure recommendations, such as: having DOE require root causes for disturbances be listed on the OE-417; and that accuracy in the "Number of Customers Affected" block be confirmed; and also as to DOE/FERC/NERC that there should multiple access points for data submitted on the OE-417; that there should be transparency and public disclosure regarding longstanding physical and cyber-security weaknesses that plague the electrical grid as well as the names of CIP violators in order to incentivize higher standards and adherence thereto. Congress must also act: It should develop legislation to ensure that the public and Congress receive reliable, up-to-date and accurate data relative to threats to the electrical grid.

These recommendations by Michael Mabee seem reasonable but what is really disconcerting to me as an everyday citizen is learning that what Mabee recommends is not already in place. We must do more to secure our electrical grid. If individuals are required to forego liberties for the sake of airline/airport security and elsewhere to mitigate soft and hard targets, then the industry responsible for our nation's lifeline, the electrical grid, should be no exception to that effort and should also be required to bring its security measures and reporting criteria to a standard that is reflective of the nefarious intentions and constant threat by terrorist organizations, under which we exist in today's world.

Respectfully submitted by:


Sara Z. Wood

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