

**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 10-12-2019

Valerie MacIntosh, 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 in education with students from kindergarten to college level. As time has progressed, it has become evident that education along with other parts of our existence has become more and more reliant on electrically dependent technology.

I understand how important it is to protect our nation’s electrical power sources. I am familiar with the “White Paper” proposed by the Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC) and am glad to see the effort to improve the safety of our infrastructure. It is critical that power companies found to be in violation of CIP standards be made public. Permission for anonymity in compliance potentially breeds contempt for the regulations and diminishes the importance of improving the security of our domestic power from unwanted or unknown attack. We have the right to know the names of companies that violate the regulatory standards and we need sufficient details to make sure that the regulatory system is working! We need to know the details and the reasons for the violations as well as the plans for implementation of a solution.

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.

I support the alternate proposal submitted by Michael Mabee, and would urge you to implement his suggestions to the fullest. We need what he is suggesting and, in my opinion, the current Infrastructure Protection Reliability Standard falls far short of doing that.

Respectfully submitted by  
Valerie MacIntosh

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