



Eagle Council XLVIII

Saturday, 9/21/19

3:30 pm

Speaker: Waller, Tommy –Tommy Waller is Vice President for Special Projects at the Center for Security Policy. He served over 17 years as an Infantry Officer and Expeditionary Group Reconnaissance Officer in the Marine Corps with multiple deployments to Afghanistan, Iraq, Africa, and South America.

The Center for Security Policy sponsors the *Secure the Grid Coalition* – a group of the country’s top-level experts on threats to the grid and how these threats must be mitigated. It is co-chaired by former House Speaker Newt Gingrich and President Clinton’s Director of Central Intelligence, R. James Woolsey. Tommy manages day to day operations of the *Secure the Grid Coalition*.

He holds a Bachelor’s in International Relations from Tulane University, attended other colleges, and received executive education in high stakes negotiations from the Wharton School.

Title: *Denying Our Enemies a Shot at Our Electrical Grid*

Outline:

- Grid 101
 - What is “The Grid” and what are some of its vulnerable components?
- Overview of Threats to the Grid
 - Cyber attack
 - Physical attack / sabotage
 - Weather: Terrestrial and Space Weather
 - EMP
- What has been done about EMP?
 - What President Trump has done
 - Who is against EMP Protection
- The “Balance of Power” and broken Regulatory Process
- How Eagle Forum Can Help!

Action points:

Eagle Forum can make a HUGE difference right now if its members submit comments to the Federal Energy Regulatory Commission (FERC) **before 26 September** to ask for transparency in the reporting of security violations on the part of electric utilities. I’ll

explain this in my briefing and next week I will create a special page on our website: www.SecureTheGrid.com that discusses how citizens can take action. That public facing site will NOT have the enclosed special instructions that can be provided to your audience for them to use when making their comments. Please see the attached enclosure and consider how you'd like to get this info to your audience.

Instructions for filing a Comment to FERC for Increased Transparency

Background:

- On August 27, 2019 the staffs of the Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC) [published](#) a white paper and opened an administrative docket for public comment. The white paper proposes ending the longstanding Critical Infrastructure Protection (CIP) [violator coverup](#). While this is a great leap forward for the Commission and NERC, the white paper proposal would not give the public, investors, Congress and other regulators enough information to evaluate CIP violators and the regulatory system.
- Michael Mabee, author of the Civil Defense Book, and member of the Secure The Grid Coalition, has filed a comment in this docket, providing an alternate proposal that would enable more appropriate transparency in the naming of CIP violators.
- Members of the Secure the Grid Coalition are telling FERC that we support the alternate proposal submitted by Michael Mabee on September 3, 2019 and that the public has 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.
- **The deadline to file on this docket is September 26, 2019** so write your letter today and submit it [online](#) to FERC Docket Number AD19-18-000, or mail it in to FERC (Be sure to include the Docket Number in your letter).
- [Submit to FERC online HERE](#) (See detailed instructions below)

or, submit by mail:

- Federal Energy Regulatory Commission
Kimberly D. Bose, Secretary
ATTN: Docket No. AD19-18-000
888 First Street, NE
Washington, DC 20426

Detailed Filing Instructions:

Go to FERC's website: <https://www.ferc.gov/>

- Hover over the "Documents & Filings" section
- Go to "E-Register" and register yourself by following the intuitive step by step process that includes an email verification and an assignment of a FERC ID number.
- Draft a letter using the exact formatting below.
- The example text provided below can form a basis for your own arguments for more transparency. **PLEASE DO NOT Copy/Paste the text below. Please articulate your own thoughts on the importance of transparency in a democracy.**

- Save your letter as a PDF with your signature.

-----**EXAMPLE TEMPLATE – DO NOT COPY**-----

**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 **Date**

__ Your Name __, 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.....__ which is relevant to this discussion because _____. I represent _____

I am familiar with the “White Paper” proposed by the Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC) and commend these organizations for proposing seeking more transparency in Notice of Penalty (NOP) filings. Such public transparency is critical to the security of the bulk power system as it provides an incentive for companies to comply with mandatory Critical Infrastructure Protection (CIP) standards. It also provides the means for public, investor, Congressional and state scrutiny and evaluation of the violators and the regulatory system.

However, I am concerned that the current “White Paper” proposal provides only a limited amount of transparency that does not give Congress, investors, other regulators, or the public sufficient information to determine whether or not these companies are complying with their obligations to protect the critical infrastructure upon which all of our lives depend. I also believe that the “White Paper” proposal does not provide sufficient information on CIP violations and violators to adequately determine whether or not the regulatory system is, in fact, working for the public interest.

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 and believe that he is well qualified to propose an alternate approach that would satisfy the public interest in relation to both the workings of the regulatory system and the compliance of the industry to CIP standards.

I am familiar with the Comments and Alternate Proposal submitted by Mr. Mabee to FERC on September 3, 2019 and I believe that both his comments and his alternate proposal are sufficiently thorough and sufficiently justified to achieve what is the primary interest of Mr. Mabee, myself, and the public at large: the security of the electric grid.

I am also familiar with the vehement opposition of industry members and industry lobbying organizations to the transparency currently proposed by FERC and NERC. I believe that FERC and NERC must be very careful to avoid allowing this effort toward transparency to be subverted by industry and lobbying organizations claiming that the type of disclosure suggested in Mr. Mabee’s comments and alternate proposal would present security risks to their assets or personnel. I believe Mr. Mabee outlines in detail

why this “security risk” argument is without merit and how transparency actually increases the security of the electric grid by helping change corporate culture.

I request that NERC and FERC carefully review the comments and alternate proposal submitted by Mr. Mabey on September 3, 2019 and that NERC and FERC adopt this proposal as a means to increase transparency and increase the security of the electric grid.

Respectfully submitted by: (insert signature below)

-----See filing instructions below-----

- Go back to the FERC website and go to the FERC Online section
 - o <https://www.ferc.gov/docs-filing/ferconline.asp>
 - o Create an account and/or Login with your credentials
 - o Click on “eFiling”
 - o Go to: General —> Comment on Rulemaking —> Comment
 - On the next screen enter docket number: **AD19-18-000**. Then follow the prompts to upload your document.
 - o Attach the PDF (Filing is free.)
 - o See screenshots below:

The image contains two screenshots. The top screenshot shows the FERC (Federal Energy Regulatory Commission) website homepage. It features the FERC logo, a search bar, and a navigation menu with links to ABOUT, MEDIA, DOCUMENTS & FILINGS, INDUSTRIES, LEGAL RESOURCES, MARKET OVERSIGHT, ENFORCEMENT, CAREERS, CONTACT US, and RESOURCES. A sidebar on the left lists various filing options like eFiling, eSubscription, eService, eLibrary, Company Registration, Forms, eForms Refresh, Filing Fees, and eTariff. The main content area has a banner for 'Electric' with a 'Continue Reading' link.

The bottom screenshot shows the 'FERC Online' web application interface. It includes a sidebar with links to FERC Online Home, Filing Type, Company Login, Payment, Docket Number, Upload Files, Intervention Desc, Filing Party(s), Contact(s), Description, Confirmation, Status, and Help. The main area is titled 'Filing Type' and contains three columns: 'How is your filing to be directed?', 'What kind of filing are you making?', and 'Filing Type (Fee)'. The first column lists filing types like General, Annual Charges, Hearing/ALJ, Gas, Electric, Oil, Hydro: Washington, and Hydro: Regional Office. The second column lists specific filing actions like (Fee) Petition for Declaratory Order, (Fee) Request for Interpretation, Audit Material, Comment, Comment on Rulemaking, Intervention, Motion, Petition for Declaratory Order, Protest, Request for Interpretation, Request for Rehearing, Request to Update Service, and Response to Complaint. The third column shows the 'Comment' filing type with a fee of \$0. At the bottom right, there are 'Next' and 'Cancel' buttons. A footer at the bottom provides contact information for FERC Online Support.

FERC Online - Web Applications of the Federal Energy Regulatory Commission

www.ferc.gov

Current FERC Time: **4:04:02 PM** Eastern

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Select Docket

Search and select all dockets and sub-dockets for your submission.

You can search for dockets or click the Quick Entry tab if you already know the docket numbers you want to insert.

Search Quick Entry

Enter Docket Number: Search (e.g. ER08-10)

Docket	Description	Applicant/Filer	Select
AD19-18-000	Notice	Joint Staff White Paper on Notices of Penalty Pertaining to Violations of Critical Infrastructure Protective Reliability Standards	

Selected Dockets:

- No Dockets have been selected. -

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For any issues regarding FERC Online, please contact [FERC Online Support](#) or call Local: 202-502-6652 | Toll-free: 866-208-3676. Please include a current mail address, telephone number, and e-mail address.

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Current FERC Time: **4:08:18 PM** Eastern

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Select Docket

Search and select all dockets and sub-dockets for your submission.

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Docket	Description	Applicant/Filer	Select
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Selected Dockets:

Docket	Description	Applicant/Filer	Remove
AD19-18-000	Notice	Joint Staff White Paper on Notices of Penalty Pertaining to Violations of Critical Infrastructure Protective Reliability Standards	

You must specify at least one docket to file against.

Next Cancel

For any issues regarding FERC Online, please contact [FERC Online Support](#) or call Local: 202-502-6652 | Toll-free: 866-208-3676. Please include a current mail address, telephone number, and e-mail address.

FERC Online - Web Applications of the Federal Energy Regulatory Commission

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Current FERC Time: **4:13:25 PM** Eastern

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Docket Number

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Filing Party(s)

Contact(s)

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Confirmation

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File Upload

Limits: 200 files per security level; 50 Mb per file; 60 character per file name. Do not revise the path/filename in the Select File box. [Acceptable File Formats](#)

Select File No file chosen

Description

- No Files Loaded -

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