



# State of New Hampshire

HOUSE OF REPRESENTATIVES

CONCORD

David K. Testerman  
State Representative, Merrimack 2  
Franklin and Hill

Attn: Chairman Neil Chatterjee  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

Re: Docket: AD19-18

Dear Chairman Chatterjee and members of the Commission,

I write today with deep concern as to the range of vulnerabilities posed by regular cyber attacks against our electric grid and its providers. The basic issue is that since 2010, the North American Electric Reliability Corporation (NERC) has been covering up the identities of Critical Infrastructure Protection (CIP) violators. This lack of transparency has been allowed by the Federal Energy Regulatory Commission (FERC).

Since we know that the Russians and the Chinese (along with others) have been in our grid for over a decade, it is quite obvious that this secret regulatory scheme is not making us safer. In fact, I believe the opposite is true. It is expressly the complexity of the system that makes the argument for more eyeballs on potential risks, compelling.

There is presently no incentive for companies to do more than the minimum on cybersecurity and physical security – if even that. If caught violating CIP standards, the public, investors and Congress will never know. I am in favor of greater accountability for the recorded incidents of cyber attacks to our national grid infrastructure; a system that invites scrutiny augments its own ability to assess threats and ensures an honest reckoning of the effectiveness with which current security measures are matching threat risks.

Thank you for the opportunity to comment on this most critical national security matter via docket AD19-18.

Regards,

A handwritten signature in black ink that reads "David K. Testerman".

David K. Testerman  
Criminal Law and Safety Committee  
33 N. State Street, LOB 204, Concord, NH 03301