

1 STATE OF CONNECTICUT
2 CONNECTICUT SITING COUNCIL

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4 RE: IMPLEMENTATION OF SECTION 8 : **Docket #346**
5 OF PUBLIC ACT NO. 07-242 AN ACT :
6 CONCERNING ELECTRICITY AND :
7 ENERGY EFFICIENCY :

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11 **September 10, 2009**
12 **Final Comments on CSC's Revised White Paper of August 25, 2009**
13 **Energy Security Risks & Considerations**

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16 **JOEL N. GORDES**
17 **DBA ENVIRONMENTAL ENERGY SOLUTIONS (EES)**
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20 EES has appreciated the opportunity to intervene in this docket and present information
21 and answer questions pertaining to security issues affecting the electric grid. It has been a most
22 informative experience.

23 The final form of the White Paper, however, indicates that EES' goal to persuasively
24 articulate its main points to the Council is unmet. Briefly, these points include:

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26 ➤ Siting should be approached in a holistic manner accounting for not merely each component
27 by itself but the effect of each component on the others and on the grid as a whole.
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29 ➤ That, for good or for ill, in an increasingly digital society it is becoming impossible to
30 separate digital from physical reality involving everything from personal identity theft to
31 physical commandeering of the grid by unwanted intruders. Neither PA 03-140 nor PA 07-
32 242 Sec. 8, two operative statutes pertaining to CSC security duties, specifies that physical
33 security alone should be "promoted" or investigated.
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35 ➤ The Council's "unique insight" that is currently mostly-directed toward environmentally-
36 oriented physical aspects of facility siting has valuable lessons that can be more widely
37 applied to security concerns.
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39 ➤ New potential threats that may be a result of the coming "Smart Grid" may exacerbate the
40 challenges facing the physical grid security via cyber means and should be examined in
41 further detail.
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43 ➤ Redundancy, if maintained within a centralized structure, provides little if any increase in
44 security or resiliency and may provide little more than additional points of failure or
45 opportunities for intrusions in the case of Smart Grid digital enhancements.
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47 In particular, if anything, the revised White Paper is narrowed further in scope with the
48 elimination of any discussion of the NERC CIPs 002-009 pertaining to cyber issues which did
49 appear in the original draft on page 4 (top). The elimination of discussion of cyber issues in the
50 white paper, including that passing reference, does not appear to be supported by the record.
51 During the hearing, in spite of warnings that cyber issues would not be addressed, it appeared to
52 EES that references were made by Council members to cyber-related matters and only then, at
53 the explicit invitation of the CSC Chairman, did EES even dare to utter the "cyber" word.

54 One point of agreement in the revised White Paper revolves about the statement that "...the
55 Council notes that while redundancy is sometimes a problem in any regulatory review, strategic
56 redundancies are actually safeguards". While the conclusion goes on to restrict this to physical
57 security, it is nonetheless an opening to some common ground for future discussions. This is
58 particularly so when greater recognition comes as to the nature of cyberthreats in their many
59 forms as having very real physical consequences and, as such, being inseparable from them in
60 many end results. It may well be that processes, procedures and solutions developed at the state
61 level, even in the siting process, although seemingly "redundant," may provide one otherwise
62 missing but ultimately critical screen missed by FERC, NERC, NIST, NPCC, DEMHS or the
63 utilities.

64 Because EES recognizes the CSC has not yet accepted many of its points, in concluding this
65 first chapter, EES quotes the much-marginalized but persistent figure ¹ Winston Churchill who
66 once said, "Now this is not the end. It is not even the beginning of the end. But it is, perhaps, the
67 end of the beginning."² With this in mind, EES hopes to continue dialogue with the Council, its
68 staff as well as the many other participants in this docket.

¹ See Churchill, Winston S. *The Gathering Storm*. Houghton-Mifflin Co. Boston. 1948.

² Said upon the conclusion of El Alamein, the first British victory of WWII.