

June 15, 2009

Judge Daniel F. Caruso  
Chairman, Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

**RE: Docket #346 Implementation of Section 8 of Public Act 07-242, An Act Concerning Electricity and Energy Efficiency. Motion to Reconsider Reliability and Natural Calamities**

Dear Judge Caruso:

Joel Gordes (DBA Environmental Energy Solutions or EES) hereby respectfully files a motion concerning the Connecticut Siting Council's White Paper regarding security of siting energy facilities issued on May 28, 2009. The White Paper states (at p. 1.):

Pursuant to legislative intent of the act, this document will review existing regulations and guidelines regarding security for the siting of electric generating and transmission facilities. Security in this document will only relate to intentional and physical threat to a facility. Threats can range from simple trespassing to vandalism to dedicated acts of acts of sabotage. Siting security in this document does not relate to operational, reliability, and maintenance procedures, asset connection requirements, or naturally-caused calamities (i.e.. Hurricanes or ice storms).

Because basic definitions differ of what includes security versus what does not, EES feels an obligation to request the Council to reconsider the White Paper's currently exclusion of reliability and naturally-caused calamities. Their interaction has the power to amplify the effect of terrorist acts and EES cites the following reasons for a reconsideration of these limitations:

- 1) Naturally-caused calamities can frequently have the same end results as acts of vandalism and dedicated acts of sabotage leading to loss of life and limb.
- 2) Naturally-caused calamities may be an opportune time to undertake acts of vandalism and dedicated acts of sabotage due to the ability of natural disasters to mask terrorist acts and add additional layers of confusion to grid operators and first responders. For instance, a naturally occurring coronal mass ejection (geomagnetic storm) originating from the sun, could be used to cover an electromagnetic pulse attack. (An account of a 1989 episode of the Canadian grid suffering significant damage from exactly such a naturally-occurring storm can be made available to the CSC upon request.)
- 3) Presidential Decision Directive (PDD) #63 of May 22, 1998, (at p.1) referenced by CSC, makes no distinction in protection of critical infrastructure between naturally-occurring and intentionally targeted efforts. It states, "These same advances have created new vulnerabilities to equipment failures, human error, **weather and other natural causes**, and physical and cyber attacks. Addressing these vulnerabilities will necessarily require flexible, evolutionary approaches that

span both the public and private sectors, and protect both domestic and international security." [Emphasis added.]

This directive also brings up the question of when the CSC speaks in the White Paper of "Security in this document will only relate to intentional physical threats to a facility," whether the CSC means to exclude cyber attacks or tacitly includes this under "physical" threats. Such distinction is unclear as the PDD (above) specifically separates the two forms of attack.

- 4) Naturally occurring disasters may amplify effects of terrorist acts. (See Appendix A where EES offers a concrete, previously published example of this vis-a vis natural gas and LNG.)
- 5) Solutions or mitigation actions for both naturally-occurring disasters and terrorist attacks are frequently the same and can be made more cost-effective when used for both purposes by adding overall societal value.
- 6) To not include the interaction of naturally-caused calamities represents a strategic omission to the White Paper that does not lead to adequately protecting the citizens of Connecticut which is the foremost responsibility of government.
- 7) Finally, EES would be less than candid, particularly to utility colleagues who have cited reliability as a security concern, if in one place EES has accepted some reliability aspects as security concerns but not so in this document. Language (for which Mr. Gordes is directly responsible) from page 24 of the *CEAB Review of the 2009 Comprehensive Plan for the Procurement of Energy Resources*, Prepared by The Connecticut Energy Advisory Board reads:

#### 4. Energy

In reference to energy security, that EDC's plan mentions **reliability**, sufficiency, availability and resource adequacy, which are only a small part of energy security. The EDC's have not fully delineated or begun to explore this issue. For example, the plan specifically "... does not include discussions of risk related to critical energy infrastructure components such as sabotage accident or **natural disaster**." [Emphasis added]

As such, since the CSC exclusions conflict with the CEAB inclusion of reliability and natural disasters as a security concerns, EES respectfully request the CSC reconsider its decision to refrain from investigating reliability and naturally-caused calamities where their interactions with terrorist acts may be used as indicated above.

Thank you for your consideration in this matter.

Sincerely,



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CC: Service List

# Gas Terminal Could Leave Us Vulnerable

By JOEL GORDES

The events of Sept. 11, 2001, were supposed to change the way we think about national security. If the discussion surrounding the proposed Broadwater liquefied natural gas facility planned for Long Island Sound is any indication, our thinking hasn't changed.

Proponents have emphasized our need for this energy at lower cost without balancing the inherent danger of increasing our dependence upon it. The risk, as indicated by the involvement of members of Congress from shoreline districts and the decision to hold hearings only in shoreline towns, is viewed as local.

What discussion there has been of terrorism and Broadwater centers only on the destruction of the facility itself, may be with the loss of a few dozen lives. While this of course would be tragic, the timing of a terrorist act could create a much greater catastrophe. Consider:

There will be a large amount of LNG at this facility and at the one in Everett, Mass., which is being expanded. In just

five years, we could become heavily dependent on the fuel at these facilities. If terrorists were to destroy the two facilities simultaneously on a frigid day like one we experienced in, say, December 1989, we might see catastrophic human suffering as a result. At the time, temperatures were in the 10 degree-below-zero range for days on end.

It would be especially disastrous if terrorists were smart enough (and they are) to wait for an ice storm as in 1973 when the state was a virtual skating rink, which would hamper use of emergency vehicles to move people to shelters or to even refuel emergency generators. In 1989, we used almost no gas for electric generation -- not the situation today or tomorrow. A successful attack would mean limited gas for heating and the electricity to run most furnaces and boilers. Neither our cities, buildings or transportation system are built under sustainability guidelines nor provide the resilience that might mitigate the catastrophic effects of such an attack.

If this scenario sounds preposterous, remember the caution from the 9/11

*It would be especially disastrous if terrorists were smart enough (and they are) to wait for an ice storm as in 1973 when the state was a virtual skating rink.*

Commission that the major problem on 9/11 was a "failing of imagination." We must do far better to imagine other scenarios and the consequences in lives and economic losses that could accompany increased dependence on LNG.

Then consider that the second-largest source of foreign LNG is Algeria (the island nation of Trinidad and Tobago is currently No. 1) and that the glossy Broadwater publication about the Long Island Sound project indicates that Algeria may be a primary source for this facility.

In 1991, Algeria was about to have free elections but it was about to become what author Fareed Zakaria has called a "one man, one vote, once" situation, as funda-

mentalists were poised to win the election. That would have been the last election after sharia, or Islamic holy law, was put in place. The military sprang a coup instead, but left another politically fragile situation.

Finally, and quite surprisingly, the aforementioned No. 1 supplier of LNG, Trinidad and Tobago, has its own small but homegrown jihadist group, Jamaat al Muslimeen, which already attempted a coup in 1990.

In light of this, it is almost conceivable that we purposely want to further expose ourselves to even greater dependency on the politics of jihadist Islam by increasing importation of LNG. While the availability of that source might continue (and it might not) it would probably be at a higher cost than we would like. That might destroy the economics of the Broadwater project, leaving us with a derelict structure in the Sound that might have to be dismantled at taxpayer expense.

For these reasons, and numerous others, this new facility has not yet passed the sniff test and requires far

more scrutiny than it has gotten. Last February, after letting my security consultant be known, I was asked to meet with representatives of the Broadwater project. Armed with 2 1/2 pages of questions, I managed to ask about a quarter of them. I found their answers insufficient to allay my fears and their attitude dismissive.

Gov. M. Jodi Rell has appointed a task force to study the implications of building the Broadwater facility. One hopes the task force members go beyond the obvious in their investigations. They should examine the many environmental objections, and expand their inquiry into energy and national security considerations.

They must ask the tough questions, and not suffer the same failures of imagination that brought us Pearl Harbor and Sept. 11.

*Joel Gordes, a former Air Force officer and former state legislator, is an consultant on energy issues including those involving energy security. His office is in West Hartford.*

1/15/06