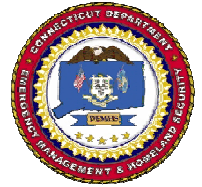




**STATE OF CONNECTICUT
DEPARTMENT OF
EMERGENCY MANAGEMENT AND HOMELAND SECURITY**



James M. Thomas
Commissioner

November 25, 2008

Mr. S. Derek Phelps
Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

RE: Docket No. 346 – Implementation of Section 8 and Section 54 of Public Act No. 07-242; An Act Concerning Electricity and Energy Efficiency

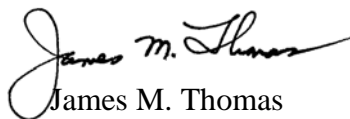
Dear Director Phelps:

On behalf of the Connecticut Department of Emergency Management and Homeland Security we would like to be a party in the above referenced proceeding.

Attached please find written testimony that was prepared by DEMHS and previously submitted electronically in order to provide comments on the issues of energy security and the siting of electric generating facilities and transmission facilities within the State of Connecticut. Please be advised that it is our intent to have Ms. Brenda Bergeron our DEMHS Legal Advisor and Mr. Scott Devico our DEMHS Legislative Liaison available at the hearing scheduled for Tuesday, January 6, 2009 at 2 p.m.

Again we would like to thank you for providing DEMHS with this opportunity. However, should your office require any additional documentation, please contact my office directly at 860-256-0800.

Sincerely,

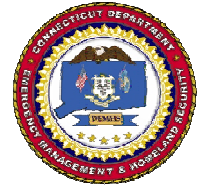

James M. Thomas
Commissioner

JMT/dja

cc: Ms. Brenda Bergeron, Legal Advisor – DEMHS
Mr. Scott Devico, Legislative Liaison - DEMHS



**STATE OF CONNECTICUT
DEPARTMENT OF
EMERGENCY MANAGEMENT AND HOMELAND SECURITY**



**TESTIMONY: Docket No. 346 – Implementation of Section 8 and Section 54
of Public Act No. 07-242 - *An Act Concerning Electricity and Energy Efficiency***

Dear Chairman Caruso and Members of the Siting Council:

Thank you for giving me the opportunity to comment on the issue of energy security and the siting of electric generating facilities and transmission facilities.

I have reviewed the Siting Council's materials and agree with the assessment outlined in the Best Management Practices-Security document. The report outlines several areas that should be addressed with regard to the siting of electric generating facilities and transmission facilities. These include the development of a security strategy that encompasses planning, preparedness, response and recovery capabilities. With a proper plan, the Council will be better able to address security and safety concerns surrounding a proposed site.

One of the most important aspects to this security strategy during the planning process is the identification of potential threats. Also, once a facility is approved and built, the addition of security measures becomes increasingly costly and can be difficult to integrate.

The Siting Council has already identified two main threats—physical and cyber. Threats may come from the public (e.g., terrorism) or from inside the site, through an employee or employer. Failing to identify potential threats could lead to an incomplete review. The planning stage is also the appropriate time for subject matter experts to look at the proposal from a global perspective. The following should be considered: type of site; location of site; effect on the environment; value to the overall reliability of the grid; whether all appropriate stakeholders are involved in the review; and possible interdependencies.

Other factors that should be addressed in the site proposal security strategy include employee credentialing and training, as well as the development of redundant systems to address cyber and physical security issues. Facility employees should receive a thorough background screening, and documentation provided by the prospective employee should be verified. Employees should also receive both security awareness training and emergency response training, coordinated with local first responders and the emergency management community.

The development of redundant systems helps ensure that site security does not rely on a single point of failure. Redundant systems may include off site data storage and backup control systems, access control systems, and facility monitoring.

In closing, enhancing energy security is vital to the state's overall homeland security strategy and the Department of Emergency Management and Homeland Security (DEMHS) strongly supports our role to advise the Siting Council on security issues raised in the siting of future electric generating facilities and transmission facilities as outlined in the Public Act 07-242.

**25 SIGOURNEY STREET, 6TH FLOOR, HARTFORD, CT 06106-5042
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