HIGH FRONTIER

Amb. Henry F. Cooper, Chairman

Lt. Gen. Daniel Graham, Founder

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STATE OF MAINE

PUBLIC UTILITIES COMMISSION

MAINE PUBLICUTILITIES COMMISSION COMMENTS OF

PUC Docket 2013-00415 AMBASSADOR HENRY F. COOPER

To whom it may concern:

I had hoped that the Public Utilities Commission (PUC) Report on protecting the Maine electric grid from natural and manmade EMP would provide a plan of action to implement the sound judgment of the Maine Legislature's Joint Committee on Energy, Utilities and Technology, and the Maine State House and Senate members, who voted nearly unanimously to support LD 131, Rep. Andrea Boland's initiative to protect the Maine electric grid. Regrettably, the draft PUC report only pays lip service to past authoritative assessments of this existential threat to Maine, and more generally all U.S. citizens, and is little more than an endorsement for the lethargic policies of the Federal authorities and representatives of the electric power industry.

If this assessment is not corrected in the report's final version, Maine will not only lose an important opportunity to protect its citizens of Maine from a well understood but widely ignored threat, with relatively inexpensive modifications to the planned upgrade to its electric grid. Maine also will lose an important opportunity to lead the nation in rectifying this widespread vulnerability that could lead to the death of several hundred million Americans.

I write as one who spent the first twenty years of my professional career involved in studying how best to assure that our strategic systems could survive the effects of a Soviet nuclear attack on the United States and be employed by the President to retaliate if such an attack occurred. I helped design and conduct underground nuclear tests and develop simulators to test our strategic systems at full scale. Later, as Deputy Assistant Secretary of the Air Force, I oversaw these efforts as developed and used to assure the survival and our post-attack operations of Air Force strategic and space systems. As Director of the Strategic Defense Initiative, I assured that our research and development programs included efforts to harden our ballistic missile defenses against EMP effects.

So, I know from first-hand experience that EMP effects nuclear weapons are real and can be countered. We have hardened our strategic systems, but not the civil infrastructure upon which our very survival would depend if we were attacked with a high altitude nuclear event—potentially from Iran or even terrorists.

The effects from such an attack would be more severe than the natural EMP from a solar storm, which will happen—it is only a question of when. But the natural EMP would be sufficient also to take down the unhardened electric grid with the same catastrophic consequences. And the electric grid is the Achilles heel of our electric critical infrastructure that supports our just-in-time economy and other key elements vital to our survival.

Such a natural EMP event, much larger than the 1859 Carrington event that is often mischaracterized as an extreme event, barely missed the Earth last year. And the Carrington

event did not occur during the maximum period of the 11-year cycle, one of which we are currently experiencing. So there is no absolutely safe period. And there is no merit in delaying efforts to harden the grid.

I have not personally studied the costs of such currently available hardening measures, but I am advised by experts I trust from a half-century of dealing with these issues that the costs for hardening the Maine electric grid would be relatively minor, especially if the hardening is incorporated in the current stage of upgrading Maine's portion of the grid.

Thus, I urge the appropriate Maine authorities to ignore the PUC report if it remains in its current form, and to take the initiative to protect its electric grid now. More broadly, Maine could lead in removing the bizarre regulatory system that is impeding the nation from dealing with this existential threat.

Sincerely yours,

Ambassador Henry F. Cooper Chairman, High Frontier