

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**Reliability Standards for Physical
Security Measures**

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Docket No. RD14-6-000

**MOTION OF
THE SECURITY ORACLE, INC.
FOR LEAVE TO INTERVENE**

This Motion for Leave to Intervene is filed by The Security Oracle, Inc. (Security Oracle) pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (Commission), 18 C.F.R. § 385.214 (2013), and Ordering Paragraph (B) of the Order Directing Filing of Standards issued in the captioned proceeding on March 7, 2014. *See Reliability Standards for Physical Security Measures*, 146 FERC ¶ 61,166 (2014). Good cause exists to grant this motion for the reasons set forth below.

COMMUNICATIONS

Communications and correspondence regarding this filing should be directed to the following:

Charles L. Butler, Jr., MPA, CPP
THE SECURITY ORACLE, INC.
1303 Lattimore Drive
Clermont, Florida 34711
Phone: (352) 988-5985
Email: cb@thesecurityoracle.com
www.TheSecurityOracle.com

Douglas F. John
Matthew T. Rick
JOHN & HENGERER
1730 Rhode Island Avenue, N.W.
Suite 600
Washington, D.C. 20036-3116
Phone: (202) 429-8801
Fax: (202) 429-8805
Email: djohn@jhenergy.com
Email: mrick@jhenergy.com

BACKGROUND

In the Order Directing the Filing of Standards, the Commission directed the North American Electric Reliability Corporation (NERC) to develop and file proposed reliability standards that “will

require certain registered entities to take steps or demonstrate that they have taken steps to address physical security risks and vulnerabilities related to the reliable operation of the Bulk-Power System.”¹ The standards are specifically to address: (1) the identification of facilities that are critical to reliability; (2) the evaluation of potential threats and vulnerabilities related to those facilities; and (3) the development and implementation of security plans.² Proposed standards are to be filed within ninety (90) days and will be considered by the Commission in a rulemaking docket, with parties provided an opportunity to file comments.³

MOTION FOR LEAVE TO INTERVENE

Security Oracle (formerly A Secure America, Inc.) is a visionary security consultancy whose overarching principle is to secure the nation’s critical infrastructure by providing business, industry, and government with credible expertise in applying benchmark and germane performance-based risk assessment methodologies, and by development of survivable and interoperable physical and information security protection systems. Security Oracle is a recognized expert in security supporting infrastructures for chemical and industrial infrastructure, including: electric power, communications systems, water and wastewater, pipelines (*e.g.*, water, gas, petroleum products, hazardous chemicals), systems controls and data acquisition (SCADA) infrastructure, and high value, critical technology and one of a kind assets like those associated with fracking operations and processes.

As a recognized security expert, including in the field of electric power, Security Oracle can provide valuable insights and assistance to the Commission, NERC, and industry participants in this

¹ 146 FERC ¶ 61,166 at P 1.

² *See id.* at PP 6, 8-9.

³ *See id.* at PP 12-13.

proceeding. Security Oracle will also be directly and significantly affected by the outcome of this proceeding, as the standards developed in this proceeding will become applicable to its existing and future clients. Such interests cannot be adequately represented by any other party hereto. Under these circumstances, Security Oracle submits that good cause exists to grant it leave to intervene in this proceeding.

CONCLUSION

WHEREFORE, for the reasons set forth above, Security Oracle respectfully requests that it be permitted to intervene in this proceeding and be made a party for all purposes thereto.

Respectfully submitted,

/s/ Douglas F. John _____

Douglas F. John

Matthew T. Rick

JOHN & HENGERER

1730 Rhode Island Avenue, N.W.

Suite 600

Washington, D.C. 20036-3116

Phone: (202) 429-8800

Email: djohn@jhenergy.com

Email: mrick@jhenergy.com

Attorneys for The Security Oracle, Inc.

March 28, 2014

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C., this 28th day of March, 2014.

/s/ Douglas F. John _____
Douglas F. John