

22 October 2018

Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive S.W.  
P.O. Box 47250 Olympia, WA 98504-7250  
Submitted by email to [records@utc.wa.gov](mailto:records@utc.wa.gov)

Re: Puget Sound Energy's Proposed Sale of Non-Controlling Interest in Puget Holdings LLC  
Docket U-180680

To the Commission:

Foreign ownership of our electrical generation, transmission, and distribution systems puts the Puget Sound region at grave risk of being a target of foreign adversarial actions. Any one of these generation, transmission, or distribution elements can be exploited to cause harm. Worse, all three elements are controlled by a single foreign owned monopoly which presents a single point for coordinated manipulation of the infrastructure. The opportunities for exploitation are numerous, and range from economic manipulation to disruption of service. Whether there every was a time where we could trust the benevolence of foreign strangers controlling our electrical power infrastructure, we cannot do so now.

Long ago, a monopoly across the region and layers of generation, transmission, and distribution may have been of value, but it now to our detriment. Foreign ownership compounds the ills of zero competition and unilateral decision making. Energize Eastside is a case in point where the foreign owned monopoly has been opaque, misleading, and worse. We need to restore US ownership so we have better accountability and more assured protection against economic manipulation.

Worse than manipulation is outright attack. Cybersecurity is a critical risk. Cybersecurity breaches are not a matter of 'if', they are a matter of 'when' and 'how bad'. A basic tenant of cybersecurity is to employ multiple layers of protection such that an attack is slowed, detected and defeated. By allowing foreign ownership, we strip away the most fundamental outer layer of protection, i.e., prevention of foreign access. We need to maintain a defensive stance and be proactive in protection of our infrastructure by putting the safeguards in place before they're needed. What this means, in part, is removing any possible access by non-US persons to any control of the infrastructure, including design, planning, and operation. With foreign ownership, there are no means by which the WUTC or any other agency can enforce a protection boundary, Foreign ownership leaves the backdoor wide open for state actors or other entities to adversely affect our infrastructure. Can we know for sure that the hooks to launch a zero day exploit are not already in place? We'll never find that out from a foreign owned monopoly.

The WUTC should not abdicate its responsibility to protect us. Please fully consider the risk and do not make the foreign sale mistake twice.

Sincerely,

Brian Elworth  
8605 129<sup>th</sup> Ct SE  
Newcastle, WA 98056

State Of WASH  
UTIL. AND TRN/PROP  
COMMISSION

10/23/18 08:03

Received  
Records Management