

March 1, 2023

Esteemed Chairs Needleman and Steinberg,
Members of the Energy and Technology Committee:

The Western Connecticut Council of Governments (WestCOG) appreciates the opportunity to comment on Raised Bill 6766, *An Act Creating a Task Force to Study Electric Infrastructure Security*.

The bill would convene a state task force to study the security of the electric grid, including security protocols and the protection of transmission and distribution infrastructure from threats.

WestCOG suggests that task force the bill establishes also include in its remit threats that do not involve breaches of grid security nor direct attacks on grid infrastructure. Several factors may make indirect attacks more common as time progresses:

- Hackers go for the point of least resistance, and with greater attention to security within the grid, indirect attacks – i.e., against customer equipment attached to the grid, which then has impacts on the grid – may become relatively easier.
- With the proliferation of Internet-connected, “smart” devices, many of which have questionable security and vendor support, the attack surface – the number of devices that may be compromised – is growing. How many smart plugs are there in Connecticut?
- The nascent “electrify everything” movement will double electricity use through the replacement of fossil fuels in space and water heating, drying, cooking, and transportation, causing high-power loads to multiply (and shrinking excess capacity in the system).

In combination, these developments may be priming electric systems to suffer the analogues of distributed denial-of-service attacks. A malicious actor who has been able to hack into, say, popular models of wi-fi thermostats or electric vehicle chargers, and organize them into a botnet could crank up air conditioners during a heat wave (or heat pumps during a cold snap), or induce electric cars to charge, by the thousands or millions at the same time. The resulting surge in demand could spike energy costs (aka spot market manipulation) and, if it exceeds supply, lead to brownouts, blackouts, and damaged equipment and lost productivity.

An opposite situation, of plunging demand, be equally – if differently – expensive. For instance, an attack that deactivated thermostats during extreme cold could create a Texas-style situation with mass pipe freezing and damage in the billions of dollars (albeit to electric customer property rather than to the electric system).

Given the growing risk and potential for severe consequences, the task force should also treat demand manipulation as a threat and plan for it as an eventuality.

Should you have questions or require additional information, please do not hesitate to contact me. Thank you for your consideration.

A handwritten signature in black ink that reads "Francis Pickering". The signature is written in a cursive style with a long horizontal stroke at the bottom.

Francis R. Pickering
Executive Director