Compliance Update

To THE ERCOT BOARD OF DIRECTORS

September 20, 2005

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ERCOT Compliance



ERCOT Compliance Activities

- > ERCOT Operations Review
- > NERC Readiness Audit
- ➤ Other Compliance Activities



ERCOT Operations Review

- Assessment of Operations' adherence to ERCOT Procedures
- August 1st 19th: Conducted Operator interviews and observations
- ➤ 251 items assessed 10 Non-Compliance Findings
 - o Frequency Control Desk 89 items assessed / 4 findings
 - Transmission & Security Desk 84 items assessed / 3 findings
 - o Operating Period Desk 26 items assessed / 2 findings
 - o Day-Ahead Desk 52 items assessed / 1 finding
- Draft Report reviewed by ERCOT Operations Management
- Final Report to be issued before October 1st
- Additional Recommendations



NERC Readiness Audit

- Audit of ERCOT Reliability Coordinator (RC) / Transmission Operator (TOP) / Balancing Authority (BA)
- ➤ On-site visit scheduled for October 18th 20th
- > Audit Team consists of about 10 members
- Assesses Operator preparedness to meet their assigned responsibilities
 - o Report issued within 60 days of on-site visit
 - o Identifies opportunities for improvement
 - NERC VP of Compliance will monitor implementation of recommendations
- Readiness Audits conducted on 3-year cycle



Other Compliance Activities

- Participating in 2005 NERC Compliance Program
 - o 44 NERC Reliability Standards included in program
 - o Non-compliance reported to the NERC Board
 - o Confirmed violations posted on the NERC Web Site
- Monitoring reliability-based Protocol and Operating Guides requirements
- Conducting on-site audits of ERCOT QSEs and TOs on a 3-year cycle
 - o Minimum of 9 QSE and 5 TO audits planned for 2005
 - o NERC Auditor to participate in some audits



Other Compliance Activities (cont'd)

- ➤ Compliance Enforcement Process under development to be filed with PUCT in accordance with PUCT S.R. 25.503 (j)
 - ➤ Day-Ahead and Real-Time Operations
 - ➤ Data Gathering and Reporting
 - ➤ Audits and Self-Certifications
 - > Event Investigations



ERCOT Compliance Webpage

http://www.ercot.com/nerccompliance/compliance.htm

