

Compliance Update

April 2007

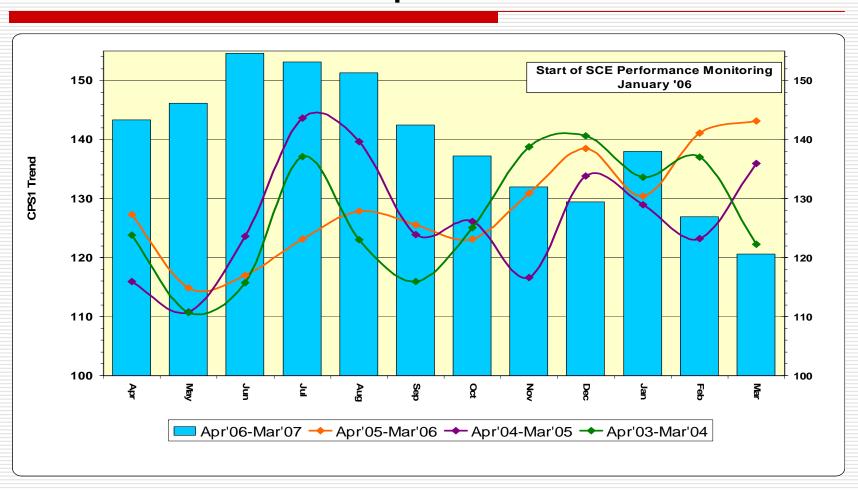


Control Performance Highlights

- NERC CPS1 Performance
 - Performance further declined in March
 - March performance comparison
 - March 2007: 120.59
 - March 2006: 143.16
 - □ 12 month rolling average comparison
 - April 2006 → March 2007: 139.59
 - April 2005 → March 2006: 128.56
- ☐ PRR 525 Performance
 - Initial scores for March indicate 29 QSEs passed / 5 non-wind-only QSEs failed the measure
 - Scores posted on the ERCOT Compliance Website
 - ☐ SCE Performance Scores

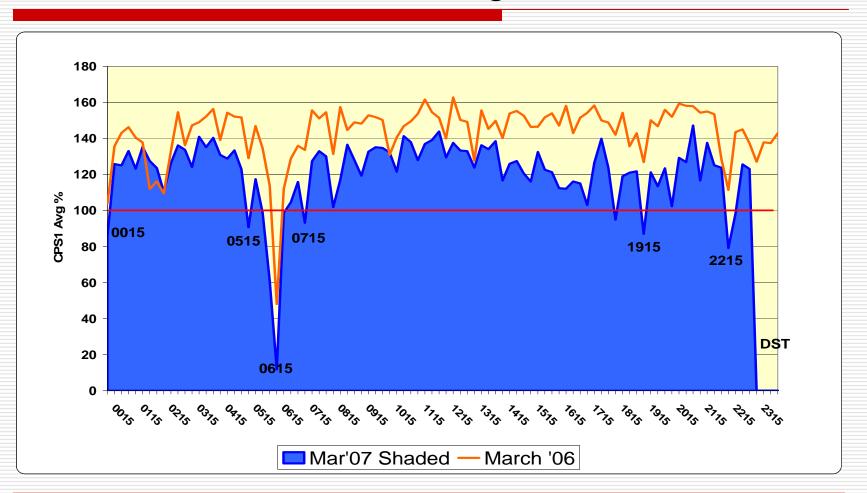


ERCOT CPS1 Performance Comparison



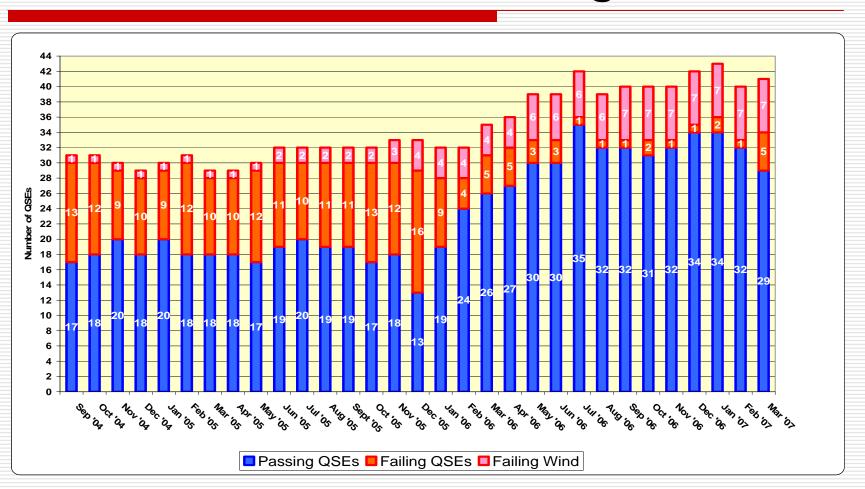


ERCOT CPS1 by Interval





QSE PRR525 10-Minute Interval Scoring





March 2007 Resource Plan Performance Metrics

Resource Plan Performance Metric	ID																							
	DK	ВТ	DE	IP	£	AP	AO	НА	BY	BC	JA	AY	AM	AR	BR	HJ	DF	BP	C	ΑE	AD	BJ	BH	CJ
Resource Status	100	•	100	100	•	99	97	96	100	100	100	93	97	100	99		98	99	98	•	99	99	-	100
LSL as % of HSL	90	•	100	100	•	100	100	100	100	96	89	100	98	99	91	•	100	97	100	•	95	98	-	100
Day Ahead Zonal Schedule	99	91	99	100	•	97	100	100	98	100	100	92	100	97	100	96	99	94	100	•	100	100	100	100
Adjustment Period Zonal Schedule	96	94	100	98	0	99	100	100	99	99	100	99	98	98	93	95	97	99	100	•	95	99	100	98
Down Bid & Obligation	98	95	98	96	•	96	99	99	99	98	100	99	98	99	98	94	67	89	98	•	98	97	99	99
Total Up Ancillary Services	-	•	98	•	•	99	100	100	98	100	100	99	98	100	97	•	98	-	•	100	-	-	-	100

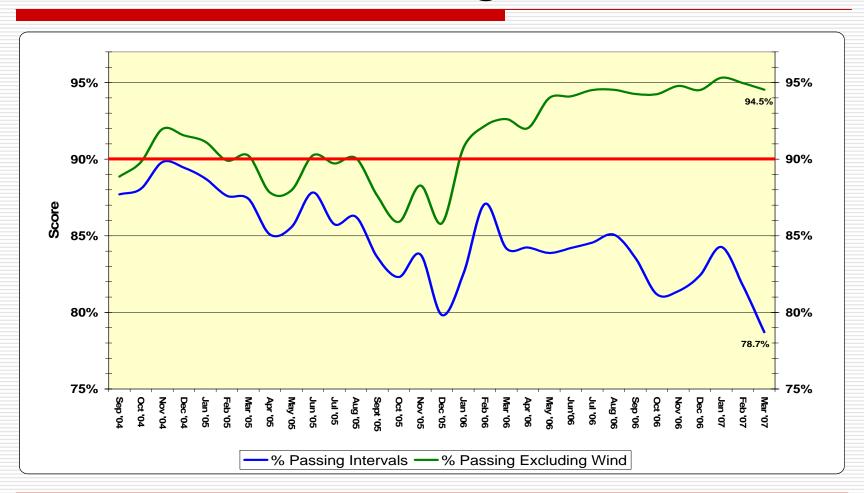
Resource Plan Performance Metric	ID																						
	CF	ET	DA	GR	BF	BE	DP	BG	GH	CX	FK	HW	IN	ΙZ	ВХ	CC	CD	FR	FS	AC	CQ	IV	10
Resource Status	100	83	99	-		-	100	99	99	100	100	100	100	98	100	98	97	100	100	100	97	-	100
LSL as % of HSL	99	100	100		•	-	•	99	100	100	93	98	95	97	100	100	92	-	100	100	97	-	-
Day Ahead Zonal Schedule	100	98	100	98	98	98	•	99	100	100	98	96	97	96	100	95	97	-	100	100	100	100	-
Adjustment Period Zonal Schedule	99	95	98	100	100	100	-	99	100	96	98	94	99	98	99	98	99	-	99	99	99	99	-
Down Bid & Obligation	97	97	94	99	99	99	-	100	100	98	100	97	97	99	96	94	94	-	-	99	98	91	-
Total Up Ancillary Services	98	97	92	-	-	-	100	100	91	100	99	99	91	98	100	100	100	-	-	-	100	-	-

4 Consecutive Failing Scores 3 Consecutive Failing Scores

2 Consecutive Failing Scores 1 Failing Score



525 Passing 10-Min Interval Percentage Trends





ERO / RE Activities

- Entity Registration
 - March 30th Latest draft list submitted to NERC (work-in-progress)
 - April 10th NERC issued letters to all owners, operators, & users of the ERCOT Bulk Power System identified by ERCOT Compliance
 - Any entity can challenge its listing and function with NFRC
- □ April 19th Anticipated that FERC will rule on Regional Delegation Agreements
- May 11th Submit 1st draft of 2008 Texas RE Business Plan & Budget to NERC
- □ June 4th NERC Reliability Standards take effect; mandatory compliance begins

October 3, 2006 Event Status of Corrective Actions

- LaaR Performance
 - Seven Protocol Violation Notices issued
 - □ Six notices related to Section 6.5.4(2) tripping requirements for LaaR
 - ☐ Summary of corrective actions
 - Additional training provided to QSE Operators training material and signed statements from Operators provided
 - New procedures developed that automate notification process – Operator training and sign-off provided
 - Performed drill sequences
 - Training provided to LaaR with emphasis on the importance of deploying LaaR per Protocols
 - Received certification statements from LaaR that related Protocols requirements had been read and understood
 - Faulty breaker identified and replaced by one LaaR

October 3, 2006 Event Status of Corrective Actions

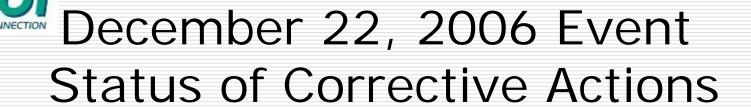
- LaaR Performance (Continued)
 - □ One notice related to Section 6.5.1.1(4) telemetry requirements
 - Corrective action
 - Replaced UPS requiring manual reset with UPS that automatically resets after power outages
 - All corrective actions completed

December 22, 2006 Event Status of Corrective Actions

- Generator Trips
 - Ride-through capability of generators during disturbances
 - □ Violation Notice issued to Generator Owner for noncompliance with an ERCOT Operating Guides Requirement – Operating Guide 3.1.4.6
 - Corrective actions
 - Continuing to discuss corrective action plan with Generating Entity
 - Generating Entity has hired a consultant to review plant relaying – preliminary results has indicated a relay setting problem
 - Additional documentation and mitigation schedule expected on April 16th

December 22, 2006 Event Status of Corrective Actions

- LaaR performance
 - ERCOT Operations to ask for retest of certain LaaR under-frequency relays that did not trip automatically
 - Three Protocol Violation Notices issued
 - Summary of corrective actions
 - □ One notice related to Section 6.5.4(2) tripping requirements for LaaR
 - Simultaneous telephone notification of all LaaR
 - Manually triggered EMS audio alarm signal telemetered to all LaaR
 - Manual tripping of one LaaR if it has not begun to ramp down 5 minutes after notification



- LaaR Performance (Continued)
 - Two notices related to Section 6.5.1.1(4) telemetry requirements
 - Summary of corrective actions
 - Meeting between QSE and LaaR to re-emphasize requirements, review issues, and develop corrective actions
 - □ Identified and replaced failed transducers
 - Suspended participation by violating LaaR until corrective actions taken
 - ☐ Full-time field manager position created to ensure performance of resources
 - Required corrective actions largely completed some additional validation required
 - Non-performing LaaR to test to validate that corrective actions working
 - New full-time field manager position not yet filled



Wind-Only Portfolio Performance

- 10-minute average scores for wind-only portfolios have ranged from 5 to 60.
- March 29th Requests for Information issued to 5 wind-only QSEs and ERCOT ISO.
- □ April 11th Responses due to ERCOT Compliance.
- Attempt to understand what efforts and activities QSEs are undertaking to improve their wind-only portfolios' performance.
- TAC has assigned the task of reviewing whether a separate performance metric for wind-only QSEs is needed to the ROS; work with WMS as necessary. Compliance to participate as needed and monitor progress.