

Texas Regional Entity Report

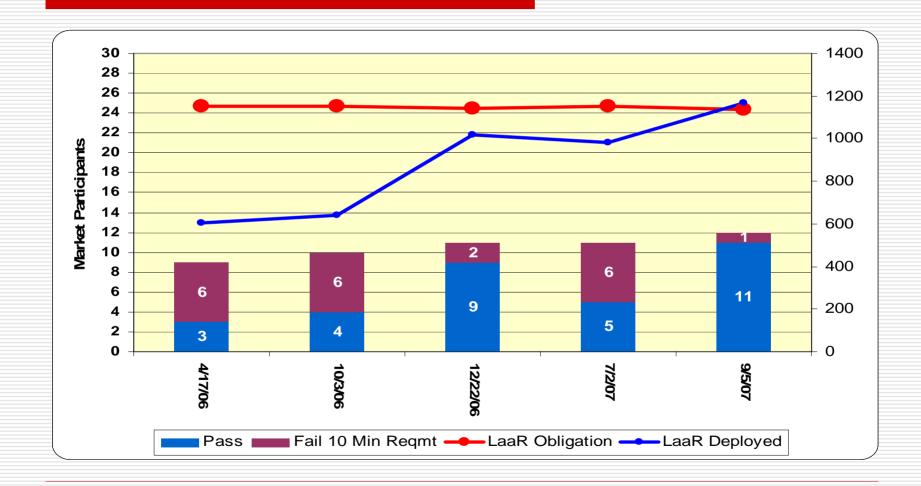
October 2007

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Performance Highlights

- ERCOT's Control Performance Standard (NERC CPS1) score for September – 128.83
- Initial scores for September indicate all nonwind-only QSEs passed the PRR 525 measure
 - This is the third straight month all non-wind-only QSEs have passed this measure
- Overall control performance score using the PRR 525 measure (SCPS) for non-wind-only QSEs > 95%

LaaR Deployment History



TEXAS REGIONAL ENTITY AN INDEPENDENT DIVISION OF ERCOT

Texas RE Monthly Summary

- □ For September......
 - Protocol & Operating Guides violations
 - O new alleged
 - NERC Standards violations
 - 1 new alleged
 - 3 new events reported
 - 2 Compliance Reviews in progress
 - Final on-site Compliance Audit completed for 2007
 - 2 registration appeals denied by NERC Board of Trustees Compliance Committee
 - 2 pending registration appeals

Texas RE Delegation Agreement

- Amended and Restated Regional Delegation Agreement (RDA) between Texas RE and NERC as approved by the Texas RE Board sent to NERC on October 2nd
- NERC Staff seeking an extension for the FERC Filing of the RDAs
 - FERC Filing was to be made on October 16th
 - Allows the NERC Board of Trustees more time to review the 8 RDAs
 - NERC Board of Trustees to approve on October 23rd
- NERC will file NERC Board of Trustees approved RDAs at FERC

Texas RE Fall Workshop

- Planned for November 2nd Austin Met Center
- Update participants on the 2007 Compliance Monitoring & Enforcement Program – provide a "sneak peek" at the 2008 Compliance Program
- Proposed topics
 - Texas RE Organization and Entity roles
 - NERC Compliance Monitoring & Enforcement Program
 - ERCOT Protocol and Operating Guides compliance
 - Organization Registration
 - Standards overview
 - Assessing compliance
 - Enforcement and sanctions
 - Q & A
- Speakers to include Texas RE and NERC Staff



Texas Regional Entity

Report Details

NERC CPS1 Performance

ERCOT's CPS1 Performance

- September Performance
 - September performance comparison
 - September 2007: 128.83
 - September 2006: 142.51
 - 12 month rolling average comparison
 - October 2006 → September 2007: 131.47
 - October 2005 → September 2006: 141.50

PRR 525 Performance

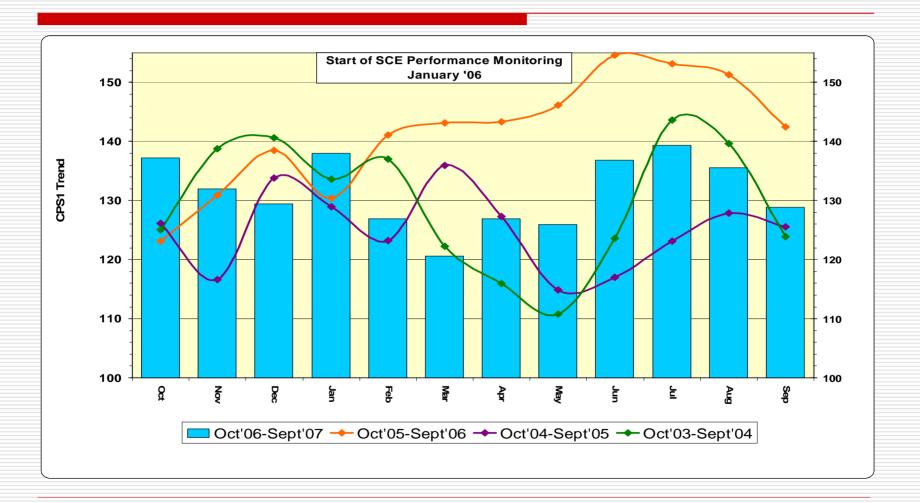
- Scores for September indicate all 34 non-wind-only QSEs passed the measure
- Scores posted on the ERCOT Compliance Website

SCE Performance Scores

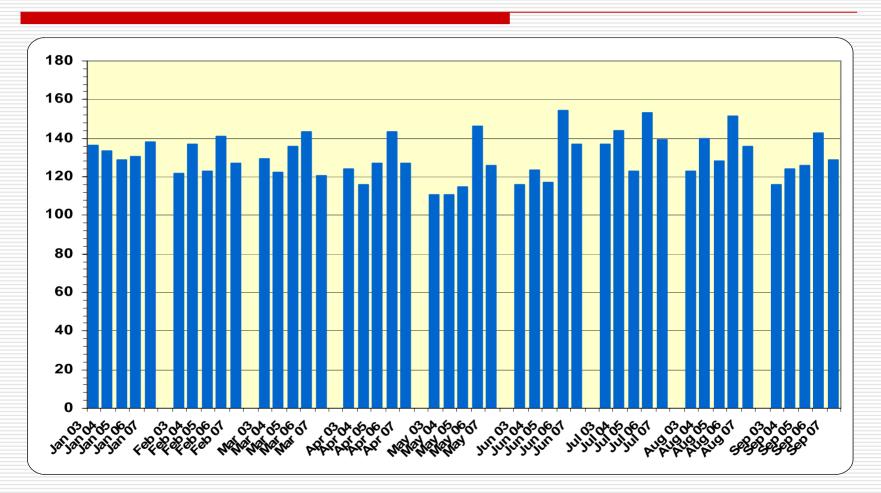
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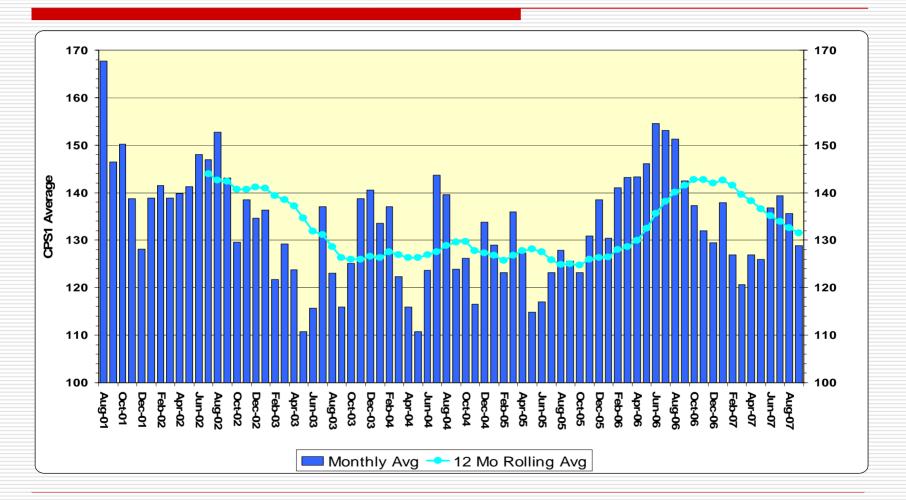
ERCOT CPS1 Performance Comparison



ERCOT CPS1 Scores

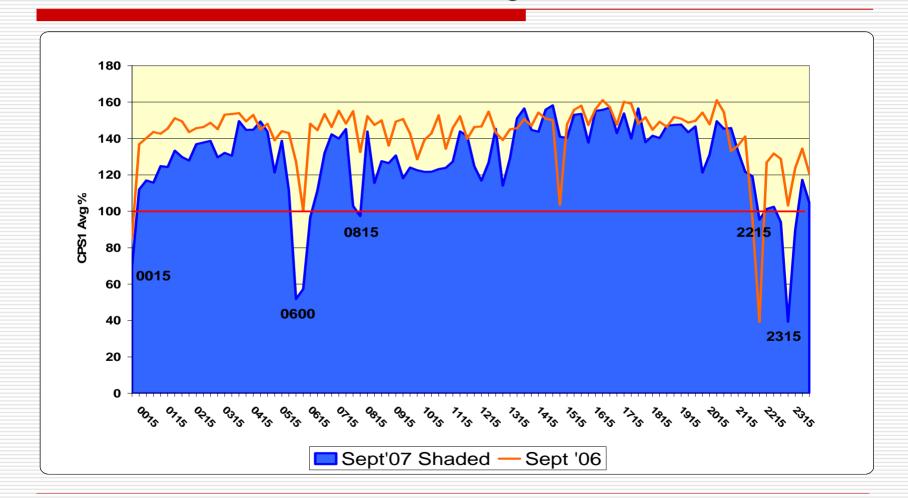


ERCOT's CPS1 Monthly Performance



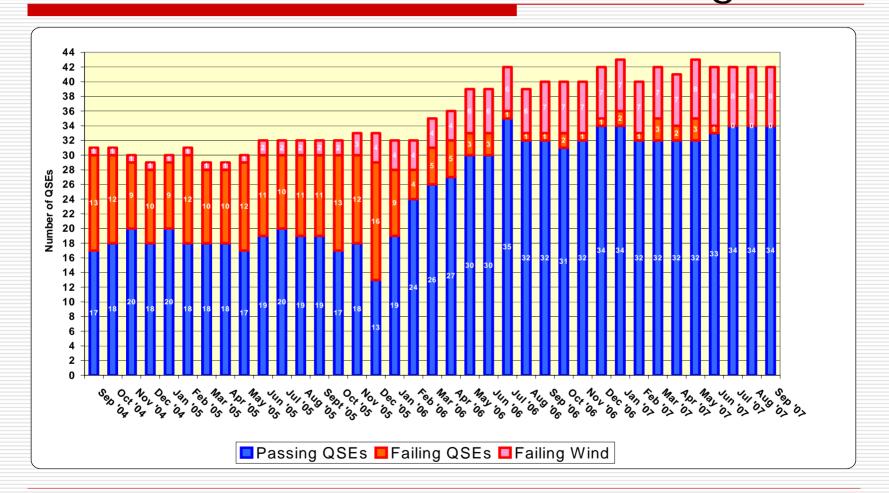
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ERCOT CPS1 by Interval



AN INDEPENDENT DIVISION OF ERCOT OSE PRR 525 10-Minute Interval Scoring

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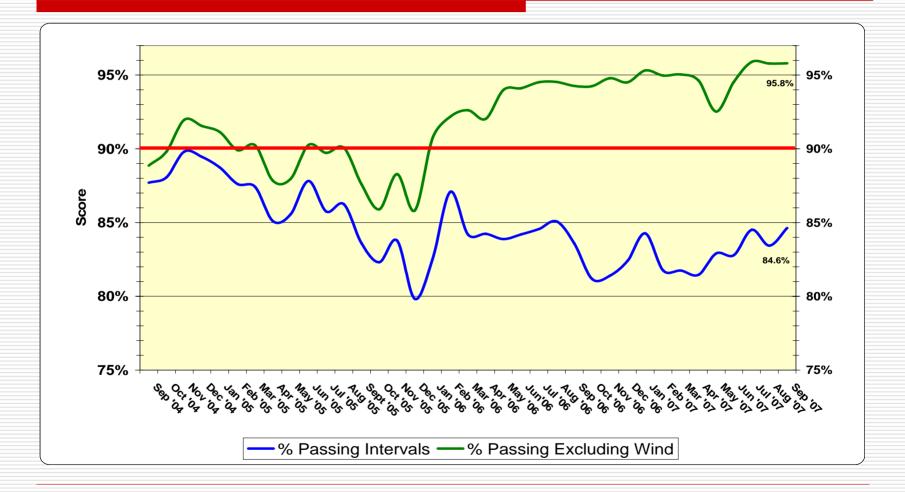


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PRR 525 Passing 10-Min Interval Percentage Trends





September 2007 Resource Plan Performance Metrics

PARTYNAME		ID																							
	DK	BT	DE	IP	AP	AO	HA	BY	BC	JA	AY	ΑМ	AR	BR	HJ	DF	BP	CI	AE	AD	BJ	BH	CJ	CF	ET
Resource Status	100	-	100	100	100	100	99	100	100	100	95	99	100	99	-	100	100	100	-	100	100	-	100	100	93
LSL HSL Percent	80	-	100	100	98	95	95	99	100	93	100	100	98	98	-	100	100	98	-	99	98	-	100	100	100
DA Zonal Schedule	100	98	100	100	100	99	99	100	100	100	85	100	100	100	99	100	100	100	-	100	100	100	97	98	91
AP Zonal Schedule	100	95	99	99	100	100	99	99	99	100	99	97	100	98	99	100	100	98	-	100	100	98	98	98	93
Down Bid & Obligation	92	96	79	97	99	97	99	97	98	97	98	97	96	96	93	85	99	97	-	97	91	96	97	97	100
Total Up AS	-	-	98	-	100	96	94	100	99	-	97	94	100	94	-	100	-	-	100	-	-	-	96	99	99

PARTYNAME	ID																								
	DA	GR	GS	BF	BE	DP	EU	BG	СХ	FK	HW	IN	ΙZ	JB	ΒХ	CC	CD	FS	AC	CQ	IV	10	FY		
Resource Status	100	-	-	-	-	97	100	98	99	99	99	99	100	-	99	100	99	100	100	99	-	100	-		
LSL HSL Percent	100	-	-	-	-	-	100	99	100	99	100	100	90	-	100	100	92	100	-	92	-	100	-		
DA Zonal Schedule	98	99	95	100	100	-	100	100	98	99	100	100	100	100	99	93	99	100	-	100	100	100	-		
AP Zonal Schedule	99	99	95	99	99	-	100	99	91	100	99	100	100	98	99	100	98	100	-	99	99	98	-		
Down Bid & Obligation	94	97	88	96	95	•	92	98	95	99	95	98	100	100	94	99	92	-	-	98	99	93	-		
Total Up AS	93	-	-	-	-	100	97	99	99	98	98	76	-	-	99	100	98	-	-	100	-	-	99		

4 Consecutive Failing Scores

3 Consecutive Failing Scores

2 Consecutive Failing Scores

1 Failing Score

September 5th NERC DCS Event

- Loss of transmission facilities caused by weather
- □ 1,084 MW of generation lost
- □ Frequency dipped to 59.739 Hz
- □ Load acting as a Resource (LaaR) manually deployed
- EECP Step 1 declared due to low reserves
- □ NERC reportable disturbance
- Frequency recovered in 6 minutes No violation of NERC BAL-002-0
- >1,150 MW LaaR deployed across ERCOT Region within 10 minutes
 - One QSE with LaaR did not meet 10-minute requirement
 - First time deployment for that LaaR (3 MW Obligation)
- Event Investigation and Compliance Review underway

LaaR Deployment – September 5th

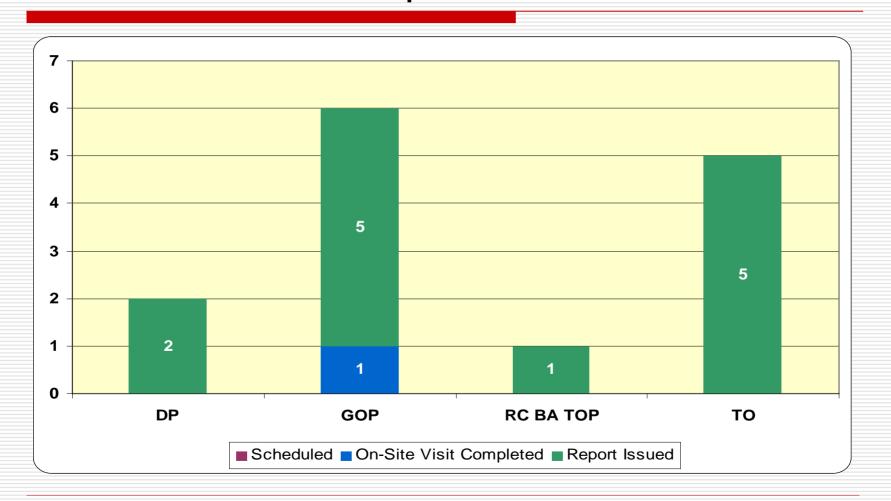
- Significant Improvement in LaaR Deployment Performance on September 5th
- Exceeded 1,150 MW Obligation
 - 1,169 MW Deployed Within 10-Minutes
- □ PRR 714 effective August 1st requires...
 - LaaR qualification testing actual load interruption
 - Additional periodic LaaR testing at least once in every 365 days
 - Disqualification for 2 failures within any rolling oneyear period
 - If disqualified, LaaR can reapply after 6 months

Organization Registration Status

- Of 227 entities registered in the ERCOT Region, 8 entities officially appealed their registration
 - 4 appeals resolved by the Texas RE
 - 2 Registered Entity appeals heard by NERC Board of Trustees Compliance Committee (BOT CC) – both appeals denied
 - 1 entity appealed their registration as a Transmission Owner
 - 1 entity appealed their registration as a Transmission Owner/Planner
 - 2 appeals pending and will go before the BOT CC for resolution
 - 2 entities appealing their registration as a Generator Operator

2007 Compliance Audits

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NERC Functional Entity Types

- DP Distribution Provider
- GO Generator Owner
- GOP Generator Operator
- TO Transmission Owner
- TP Transmission Planner

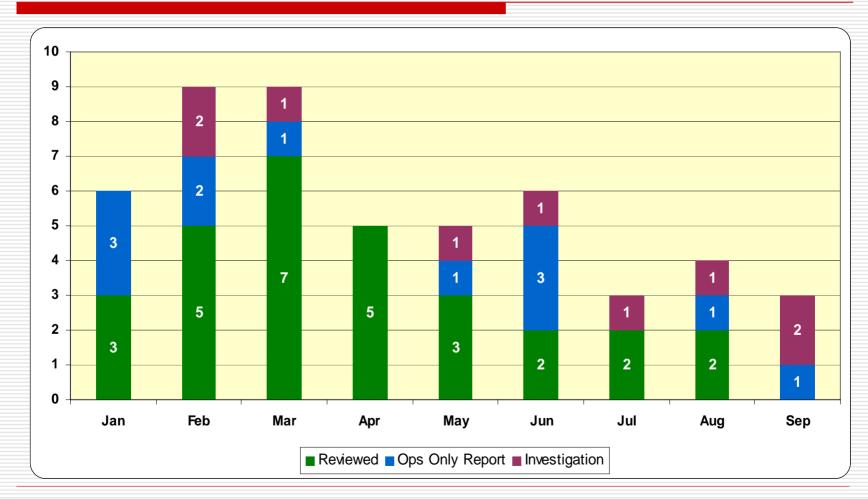
- RC Reliability Coordinator
- BA Balancing Authority
- TOP Transmission Operator
- PA Planning Authority
- TSP Transmission Service Provider
- RP Resource Planner
- PSE Purchasing-Selling Entity

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Compliance Reviews

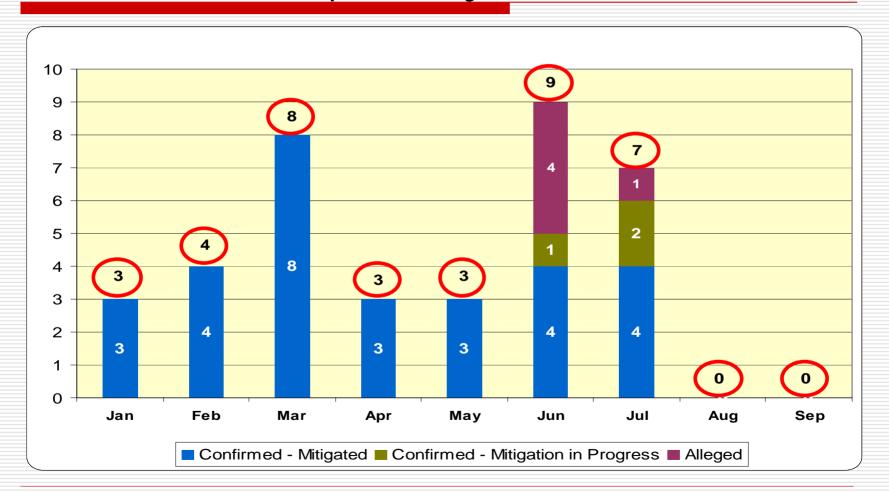
Events by Month





Violations of ERCOT Protocols

Reported by Month

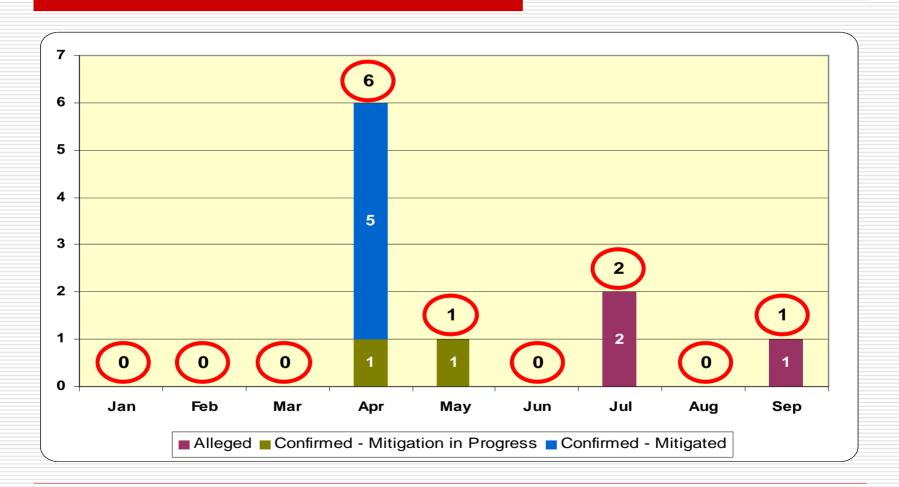


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Violations of NERC Standards

Reported by Month





NERC Reliability Standard Violations

Post June 18th

- July Alleged violations of PRC-008 R1 & R2 discovered during audit
 - Implementation and Documentation of Under Frequency Load Shedding (UFLS) Equipment Maintenance Program
 - Documentation of the maintenance and testing program was not provided
 - Violation Severity: Level 4 (Severe)
 - Violation Risk Factor: Medium
 - Potential Impact: Low (incomplete documentation of work performed)
 - Less than 1% of total UFLS in ERCOT
 - Category Administrative



NERC Reliability Standard Violations

Post June 18th

- September Alleged violation of PRC-005 R2 discovered through Self-Certification
 - Transmission and Generation Protection System Maintenance and Testing
 - Maintenance & Testing did not occur within the identified intervals
 - Violation Severity: Level 2 (Moderate)
 - Violation Risk Factor: Lower
 - Potential Impact: Low (small non-345 KV system; limited number of devices late on maintenance)
 - Category Technical

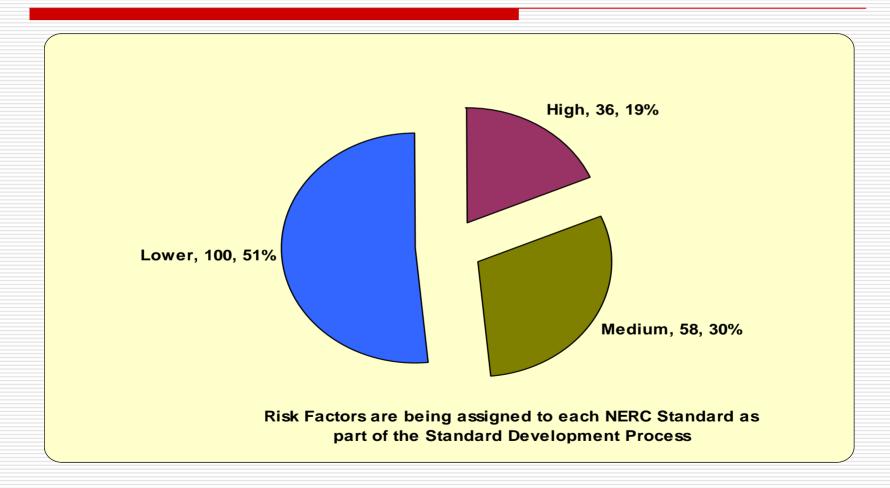


NERC Standards Self-Reported Violations Pre-June 18th

Mitigation Plan Status 60 50 Number of Violations 40 30 20 10 0 FAC-002-0 BAL-005-0 TOP-002-2 TOP-003-0 FAC-009-1 VAR-002-1 PRC-005-1 TOP-001-1 PRC-004-1 IRO-001-1 FAC-001-0 -AC-008-1 PRC-001-1 IRO-004-1 COM-002-2 MOD-010-0 IPL-003-0 PRC-018-1 TOP-006-1 **IPL-004-0** CIP-001-1 **MOD-012-0** Mitigation Plans Completed Mitigation Plans In Progress



Risk Factors for Self-Reported Violations Pre-June 18th



Self-Reported Violation Categorization

