

NERC Standards Violations

| | Registered Entity | Violation Date | Violation Status | Category | Violation Severity Level | Risk Factor | Mitigation Plan Status | Texas RE Assessment of Reliability Impact |
|----|-------------------|----------------|------------------|-----------|--------------------------|-------------|-------------------------------|---|
| 1 | T | 10/20/08 | Preliminary | Technical | High | Medium | Submitted | Large |
| 2 | T | 10/20/08 | Preliminary | Technical | High | Medium | Submitted | Large |
| 3 | T | 10/20/08 | Preliminary | Technical | High | Medium | Submitted | Large |
| 4 | T | 10/20/08 | Preliminary | Technical | Severe | High | Submitted | Large |
| 5 | T | 10/20/08 | Preliminary | Technical | High | High | Submitted | Large |
| 6 | F | 3/17/08 | Preliminary | Technical | Severe | High | Completed* | Medium |
| 7 | T | 10/10/08 | Preliminary | Technical | High | Medium | Submitted* | Medium |
| 8 | W | 11/17/08 | Preliminary | Technical | Severe | High | Completed* | Medium |
| 9 | Q | 9/22/08 | Preliminary | Technical | Severe | High | Approval (by NERC) | Small |
| 10 | U | 9/24/08 | Preliminary | Technical | Severe | High | Submitted | Small |
| 11 | F | 10/10/08 | Preliminary | Technical | Moderate | High | Completed | Small |
| 12 | V | 11/3/08 | Preliminary | Technical | Severe | High | Not Submitted | Small |
| 13 | V | 11/3/08 | Preliminary | Technical | Severe | Medium | Not Submitted | Small |
| 14 | A | 10/3/07 | Confirmed | Admin | Severe | Lower | Approved, Extension Requested | Minimal |
| 15 | A | 10/3/07 | Confirmed | Admin | Severe | Lower | Approved, Extension Requested | Minimal |
| 16 | A | 10/3/07 | Confirmed | Admin | Severe | Lower | Approved, Extension Requested | Minimal |
| 17 | A | 10/3/07 | Confirmed | Admin | Severe | Medium | Approved, Extension Requested | Minimal |

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| 18 | A | 10/3/07 | Confirmed | Admin | Severe | Medium | Approved, Extension Requested | Minimal |
| 19 | A | 10/3/07 | Confirmed | Technical | Lower | High | Approved, Completed | Minimal |
| 20 | C | 1/16/08 | Alleged | Admin | Lower | Medium | Approved, Completed* | Minimal |
| 21 | C | 1/16/08 | Alleged | Admin | High | Medium | Approved, Completed* | Minimal |
| 22 | D | 2/15/08 | Preliminary | Technical | Severe | High | Completed* | Minimal |
| 23 | D | 2/15/08 | Preliminary | Technical | Severe | High | Completed* | Minimal |
| 24 | D | 2/15/08 | Preliminary | Technical | Severe | Medium | Completed* | Minimal |
| 25 | D | 2/15/08 | Preliminary | Technical | Severe | Medium | Completed* | Minimal |
| 26 | D | 2/15/08 | Preliminary | Technical | Severe | Medium | Completed* | Minimal |
| 27 | D | 2/15/08 | Preliminary | Admin | Lower | Medium | Completed* | Minimal |
| 28 | D | 2/15/08 | Preliminary | Admin | Lower | Medium | Completed* | Minimal |
| 29 | D | 2/15/08 | Preliminary | Admin | High | Medium | Completed* | Minimal |
| 30 | D | 2/15/08 | Preliminary | Admin | Lower | Medium | Completed* | Minimal |
| 31 | D | 2/15/08 | Preliminary | Admin | Severe | Medium | Completed* | Minimal |
| 32 | D | 2/15/08 | Preliminary | Admin | Severe | Lower | Completed* | Minimal |
| 33 | E | 2/28/08 | Preliminary | Admin | Moderate | Lower | Approved, Completed* | Minimal |
| 34 | E | 2/28/08 | Preliminary | Admin | Moderate | Medium | Approved, Completed* | Minimal |
| 35 | M | 8/4/08 | Alleged | Technical | Lower | Medium | Not Required (non-enforceable) | Minimal |

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| 36 | T | 10/20/08 | Preliminary | Technical | Lower | Medium | Submitted | Minimal |
| 37 | T | 10/20/08 | Preliminary | Technical | Severe | High | Submitted | Minimal |
| 38 | T | 10/20/08 | Preliminary | Technical | Lower | Medium | Submitted | Minimal |
| 39 | T | 10/20/08 | Preliminary | Technical | Severe | Lower | Submitted | Minimal |
| 40 | T | 10/20/08 | Preliminary | Technical | Moderate | Medium | Submitted | Minimal |
| 41 | F | 11/18/08 | Preliminary | Technical | TBD | Medium | Completed | Minimal |
| 42 | F | 11/18/08 | Preliminary | Technical | Severe | Medium | Completed | Minimal |
| 43 | T | 12/08/08 | Alleged | Technical | Not Specified | Lower | Completed | Minimal |
| 44 | Z | 12/18/08 | Preliminary | Technical | TBD | Lower | Submitted | Minimal |

Legend:

- Violation Status – Preliminary, Alleged, Confirmed
- Category – Technical, Training, Administrative
- Violation Severity Level – Lower, Moderate, High, Severe
- Risk Factor – High, Medium, Lower
- Mitigation Plan Status – Not Submitted, Submitted, Approved (by NERC), (After Approval - On Schedule, Behind Schedule, Extension Requested, Completed)
- Texas RE Assessment of Risk to System –Minimal, Small, Medium, Large, Immense

* Entity is in settlement discussions

ERCOT Protocols & Operating Guides Violations

| | Protocol/Operating Guide | Brief Description | Violation Date | Violation Status | Discovery Method | Mitigation Plan Status |
|---|--------------------------|--|----------------|------------------|------------------|------------------------|
| 1 | OG2.9.2 | Automatic Firm Load Shedding | 7/24/08 | Alleged | Self-Reporting | Submitted |
| 2 | P5.4.4 | Compliance with Dispatch Instructions | 9/22/08 | Alleged | Spot Check | Completed |
| 3 | OG8.3.3 | QSE Responsibilities | 9/24/08 | Alleged | Incident | Submitted |
| 4 | P6.5.7.2 P16.2.2 | QSE Responsibilities | 11/04/08 | Initial | Incident | Submitted |
| 5 | P6.10.5.4 | Responsive Reserve Services Deployment | 11/12/08 | Initial | Incident | Submitted |
| 6 | P4.10.2 P4.10.5 | QSE Scoring Review | 11/12/08 | Initial | Data Submittal | Submitted |
| 7 | P4.10.2 P4.10.6 | QSE Scoring Review | 1/07/09 | Alleged | Data Submittal | Submitted |
| 8 | OG1.8.2 | System Operating Training Requirements | 1/13/09 | Alleged | Compliance Audit | Submitted |

Legend:

- Violation Status – Initial, Alleged, Confirmed
- Discovery Method – Compliance Audit, Investigation, Self-Reported, Spot Check, Self-Certification, Data Submittal, Incident Report, Data Gathering
- Mitigation Plan Status – Not Submitted, Submitted, On Schedule, Behind Schedule, Extension Requested, Extension Requested/Granted, Completed