

NERC Standards Violations

	Entity	Violation Date	Violation Status	Category	VSL	VRF	Mitigation Plan Status	Next Step(s) Needed	Deadline for Finishing Next Step(s)	Texas RE Assessment of Reliability Impact
1	T	10/20/2008	Preliminary	Technical	H	M	Approval (by NERC)	NAVAPS		Large
2	T	10/20/2008	Preliminary	Technical	H	M	Approval (by NERC)	NAVAPS		Large
3	T	10/20/2008	Preliminary	Technical	H	M	Approval (by NERC)	NAVAPS		Large
4	T	10/20/2008	Preliminary	Technical	S	H	Approval (by NERC)	NAVAPS		Large
5	T	10/20/2008	Preliminary	Technical	H	H	Approval (by NERC)	NAVAPS		Large
6	F	3/21/2008	Preliminary	Technical	S	H	Completed & Confirmed*	NERC Settlement Approval		Medium
7	T	10/10/2008	Preliminary	Technical	H	M	Submitted*	Settlement Agreement	7/30/2009	Medium
8	W	11/17/2008	Preliminary	Technical	S	H	Approval (by NERC)	Mitigation Verification	8/3/2009	Medium
9	Q	39713	Preliminary	Technical	S	H	Completed	Settlement Agreement	8/17/2009	Small
10	U	39715	Preliminary	Technical	S	H	Approval (by NERC)	NAVAPS	7/17/2009	Small
11	F	10/10/2008	Preliminary	Technical	M	H	Approval (by NERC)	NAVAPS	7/24/0009	Small
12	V	11/3/2008	Preliminary	Technical	S	H	Not Submitted	Plan Submitted ⁺	7/24/2009	Small
13	V	11/3/2008	Preliminary	Technical	S	M	Not Submitted	Plan Submitted ⁺	7/24/2009	Small
14	A	10/3/2007	Confirmed	Admin	S	L	New Plan Submitted	Approval (by NERC)	8/9/2009	Minimal
15	A	10/3/2007	Confirmed	Admin	S	L	New Plan Submitted	Approval (by NERC)	8/9/2009	Minimal
16	A	10/3/2007	Confirmed	Admin	S	L	New Plan Submitted	Approval (by NERC)	8/9/2009	Minimal
17	A	10/3/2007	Confirmed	Admin	S	M	New Plan Submitted	Approval (by NERC)	8/9/2009	Minimal
18	A	10/3/2007	Confirmed	Admin	S	M	New Plan Submitted	Approval (by NERC)	8/9/2009	Minimal
19	A	10/3/2007	Confirmed	Technical	L	H	Approved, Completed	FERC Approval		Minimal
20	C	1/23/2008	Alleged	Admin	L	M	Completed & Confirmed*	FERC Approval		Minimal
21	C	1/23/2008	Alleged	Admin	H	M	Completed & Confirmed*	FERC Approval		Minimal

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22	D	2/15/2008	Preliminary	Technical	S	H	Completed & Confirmed*	FERC Approval		Minimal
23	D	2/15/2008	Preliminary	Technical	S	H	Completed & Confirmed*	FERC Approval		Minimal
24	D	2/15/2008	Preliminary	Technical	S	M	Completed & Confirmed*	FERC Approval		Minimal
25	D	2/15/2008	Preliminary	Technical	S	M	Completed & Confirmed*	FERC Approval		Minimal
26	D	2/15/2008	Preliminary	Technical	S	M	Completed & Confirmed*	FERC Approval		Minimal
27	D	2/15/2008	Preliminary	Admin	L	M	Completed & Confirmed*	FERC Approval		Minimal
28	D	2/15/2008	Preliminary	Admin	L	M	Completed & Confirmed*	FERC Approval		Minimal
29	D	2/15/2008	Preliminary	Admin	H	M	Completed & Confirmed*	FERC Approval		Minimal
30	D	2/15/2008	Preliminary	Admin	L	M	Completed & Confirmed*	FERC Approval		Minimal
31	D	2/15/2008	Preliminary	Admin	S	M	Completed & Confirmed*	FERC Approval		Minimal
32	D	2/15/2008	Preliminary	Admin	S	L	Completed & Confirmed*	FERC Approval		Minimal
33	E	3/5/2008	Preliminary	Admin	M	L	Completed & Confirmed*	FERC Approval		Minimal
34	E	3/5/2008	Preliminary	Admin	M	M	Completed & Confirmed*	FERC Approval		Minimal
35	T	10/20/2008	Preliminary	Technical	L	M	Approval (by NERC)	NAVAPS		Minimal
36	T	10/20/2008	Preliminary	Technical	S	H	Approval (by NERC)	NAVAPS		Minimal
37	T	10/20/2008	Preliminary	Technical	L	M	Approval (by NERC)	NAVAPS		Minimal
38	T	10/20/2008	Preliminary	Technical	S	L	Approval (by NERC)	NAVAPS		Minimal
39	T	10/20/2008	Preliminary	Technical	M	M	Approval (by NERC)	NAVAPS		Minimal
40	F	11/18/2008	Preliminary	Technical	TBD	M	Completed	Approval (by NERC)		Minimal
41	F	11/18/2008	Preliminary	Technical	S	M	Completed	Approval (by NERC)		Minimal
42	Z	12/18/2008	Preliminary	Technical	TBD	H	Approval (by NERC)	Mitigation Verification	7/17/2009	Minimal

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43	F	2/10/2009	Possible	NA	NA	NA	NA	Dismissed		NA
44	F	6/8/2009	Possible	TBD	TBD	M	Not Submitted	Submit Mitigation Plan+	7/8/2009	TBD
45	F	6/8/2009	Possible	Technical	TBD	H	Not Submitted	Submit Mitigation Plan ⁺	7/8/2009	TBD
46	T	3/30/2009	Possible	TBD	TBD	TBD	Submitted	Validate Violation		TBD
47	T	3/30/2009	Possible	TBD	TBD	TBD	Submitted	Validate Violation		TBD
48	AC	4/16/2009	Possible	Technical	TBD	M	Not Submitted	NAVAPS		TBD
49	AC	6/2/2009	Possible	Technical	TBD	H	Not Submitted	NAVAPS		TBD
50	AC	6/2/2009	Possible	Technical	TBD	H	Not Submitted	NAVAPS		TBD

Legend:

Violation Status – Preliminary, Alleged, Confirmed

Discovery Method – Compliance Audit, Readiness Audit, Investigation, Self-Reported, Spot Check, Self-Certification, Data Submittal, Complaint

Category – Technical, Training, Administrative

Violation Severity Level (VSL) – Lower (L), Moderate (M), High (H), Severe (S)

Violation Risk Factor – High (H), Medium (M), Lower (L)

Mitigation Plan Status – Not Submitted, Submitted, Approval (by NERC), (After Approval - On Schedule, Behind Schedule, Extension Requested, Completed)

NAVAPS = Notice of Alleged Violation and Proposed Penalty or Sanction

Assessment of Reliability Impact - Minimal, Small, Medium, Large, Immense

- Assessment of Reliability Impact Considers:
- Time horizon (real-time issues versus planning issues)
 - Size of the entity (assets and facilities);
 - Category of violation (technical versus documentation)
 - Potential effect of violation
 - Actual effect of violation

Status Change = Highlighted in Gray

* Entity is in settlement discussions *Next step is dependent on entity

ERCOT Protocols & Operating Guides Violations

	Protocol/ Operating Guide	Brief Description	Violation Date	Violation Status	Mitigation Plan Status	Next Status Step	Estimated Date of Next Step	Texas RE Assessment of Reliability Impact
1	P6.10.5.4	Responsive Reserve Services Deployment	11/12/2008	Alleged	Completed	Verify Complete Plan	7/24/2009	Minimal
2	OG2.9.2	Automatic Firm Load Shedding (LaaRs)	7/24/2008	Alleged	Verified	N/A	N/A	Small
3	OG8.3.3	QSE Responsibilities	9/24/2008	Alleged	Submitted	Verify Complete Plan	40024	Small
4	P6.5.7.2 P16.2.2	QSE Responsibilities	11/4/2008	Alleged	Completed	N/A	N/A	Small
5	OG1.8.2	System Operating Training Requirements	1/13/2009	Alleged	Submitted	Complete Plan ⁺	12/31/2009	Small
6	OG1.8.2	System Operating Training Requirements	4/20/2009	Alleged	Not Submitted		12/31/2009	Small
7	OG1.8.2	System Operating Training Requirements	6/2/2009	Initial	Not Submitted	Submit Plan ⁺	7/24/2009	Small
8	P6.10.5.3	SCPS2 Score less than 90%	4/30/2009	Alleged	Submitted	Review Plan	7/20/2009	Medium
9	P8.1.3.2	Planned Outage and Maintenance Outage	5/12/2009	Alleged	Completed	Verify Complete Plan	7/17/2009	Medium
10	P6.10.5.3	SCPS2 Score less than 90%	6/9/2009	Initial	Submitted	Approve Mitigation Plan	7/17/2009	Medium

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

Assessment of Reliability Impact - Minimal, Small, Medium, Large, Immense

- Assessment of Reliability Impact Considers:
- Time horizon (real-time issues versus planning issues)
 - Size of the entity (assets and facilities);
 - Category of violation (technical versus documentation)
 - Potential effect of violation
 - Actual effect of violation

*Next step is dependent on entity