

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	Alleged	Technical	H	M	Approval (by NERC)	NAVAPS Response+	10/30/2009	Large
2	T	10/20/2008	Alleged	Technical	H	M	Approval (by NERC)	NAVAPS Response+	10/30/2009	Large
3	T	10/20/2008	Alleged	Technical	H	M	Approval (by NERC)	NAVAPS Response+	10/30/2009	Large
4	T	10/20/2008	Alleged	Technical	S	H	Approval (by NERC)	NAVAPS Response+	10/30/2009	Large
5	T	10/20/2008	Alleged	Technical	H	H	Approval (by NERC)	NAVAPS Response+	10/30/2009	Large
6	F	3/21/2008	Preliminary	Technical	S	H	Completed & Confirmed*	NERC Settlement Approval		Medium
7	T	10/10/2008	Alleged	Technical	H	M	Submitted*	Settlement Agreement	10/26/2009	Medium
8	W	11/17/2008	Preliminary	Technical	S	H	Approval (by NERC)*	Settlement Agreement	10/19/2009	Medium
9	Q	9/22/2008	Preliminary	Technical	S	H	Completed*	Settlement Agreement		Small
10	U	9/24/2008	Alleged	Technical	S	H	Completed*	Settlement Agreement	11/9/2009	Small
11	F	10/10/2008	Preliminary	Technical	M	H	Approval (by NERC)*	Settlement Agreement	10/26/2009	Small
12	V	11/3/2008	Preliminary	Technical	S	H	Not Submitted	NAVAPS	11/9/2009	Small
13	V	11/3/2008	Preliminary	Technical	S	M	Not Submitted	NAVAPS	11/9/2009	Small
14	AC	6/2/2009	Preliminary	Technical	TBD	H	Approval (by NERC)	NAVAPS	11/30/2009	Small
15	AC	6/2/2009	Preliminary	Technical	TBD	H	Approval (by NERC)	NAVAPS	11/30/2009	Small
16	F	6/8/2009	Preliminary	Technical	TBD	H	Approval (by NERC)	NAVAPS	11/30/2009	Small
17	A	10/3/2007	Confirmed	Admin	S	L	New Plan Submitted	Approval (by NERC)		Minimal
18	A	10/3/2007	Confirmed	Admin	S	L	New Plan Submitted	Approval (by NERC)		Minimal
19	A	10/3/2007	Confirmed	Admin	S	L	New Plan Submitted	Approval (by NERC)		Minimal
20	A	10/3/2007	Confirmed	Admin	S	M	New Plan Submitted	Approval (by NERC)		Minimal
21	A	10/3/2007	Confirmed	Admin	S	M	New Plan Submitted	Approval (by NERC)		Minimal

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22	A	10/3/2007	Confirmed	Technical	L	H	Approved, Completed	N/A		Minimal
23	C	1/23/2008	Alleged	Admin	L	M	Completed & Confirmed	N/A	N/A	Minimal
24	C	1/23/2008	Alleged	Admin	H	M	Completed & Confirmed	N/A	N/A	Minimal
25	D	2/15/2008	Preliminary	Technical	S	H	Completed & Confirmed	N/A	N/A	Minimal
26	D	2/15/2008	Preliminary	Technical	S	H	Completed & Confirmed	N/A	N/A	Minimal
27	D	2/15/2008	Preliminary	Technical	S	M	Completed & Confirmed	N/A	N/A	Minimal
28	D	2/15/2008	Preliminary	Technical	S	M	Completed & Confirmed	N/A	N/A	Minimal
29	D	2/15/2008	Preliminary	Technical	S	M	Completed & Confirmed	N/A	N/A	Minimal
30	D	2/15/2008	Preliminary	Admin	L	M	Completed & Confirmed	N/A	N/A	Minimal
31	D	2/15/2008	Preliminary	Admin	L	M	Completed & Confirmed	N/A	N/A	Minimal
32	D	2/15/2008	Preliminary	Admin	H	M	Completed & Confirmed	N/A	N/A	Minimal
33	D	2/15/2008	Preliminary	Admin	L	M	Completed & Confirmed	N/A	N/A	Minimal
34	D	2/15/2008	Preliminary	Admin	S	M	Completed & Confirmed	N/A	N/A	Minimal
35	D	2/15/2008	Preliminary	Admin	S	L	Completed & Confirmed	N/A	N/A	Minimal
36	E	3/5/2008	Preliminary	Admin	M	L	Completed & Confirmed*	FERC Approval		Minimal
37	E	3/5/2008	Preliminary	Admin	M	M	Completed & Confirmed*	FERC Approval		Minimal
38	T	10/20/2008	Alleged	Technical	L	M	Approval (by NERC)	NAVAPS Response+	10/30/2009	Minimal
39	T	10/20/2008	Alleged	Technical	S	H	Approval (by NERC)	NAVAPS Response+	10/30/2009	Minimal
40	T	10/20/2008	Alleged	Technical	L	M	Approval (by NERC)	Dismissed	N/A	Minimal
41	T	10/20/2008	Alleged	Technical	S	L	Approval (by NERC)	Dismissed	N/A	Minimal
42	T	10/20/2008	Alleged	Technical	M	M	Approval (by NERC)	Dismissed	N/A	Minimal

	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
43	F	39770	Preliminary	Technical	TBD	M	Completed*	Settlement Agreement	10/26/2009	Minimal
44	F	39770	Preliminary	Technical	S	M	Completed*	Settlement Agreement	10/26/2009	Minimal
45	Z	12/18/2008	Preliminary	Technical	TBD	H	Approval (by NERC)	NAVAPS	11/27/2009	Minimal
46	F	2/10/2009	Possible	N/A	N/A	N/A	N/A	Dismissed	N/A	N/A
47	F	6/8/2009	Preliminary	Technical	TBD	M	Approval (by NERC)*	Settlement Agreement	10/26/2009	Minimal
48	T	8/25/2009	Preliminary	TBD	TBD	TBD	Approval (by NERC)	NAVAPS	11/30/2009	Minimal
49	T	8/25/2009	Preliminary	TBD	TBD	TBD	Approval (by NERC)	NAVAPS	11/30/2009	Minimal
50	AC	6/2/2009	Preliminary	Technical	TBD	M	Approval (by NERC)	NAVAPS	11/30/2009	Minimal
51	AD	8/20/2009	Preliminary	Technical	TBD	M	Not Submitted	NAVAPS	11/23/2009	Minimal
52	AE	8/20/2009	Preliminary	Technical	TBD	M	Not Submitted	NAVAPS	11/23/2009	Minimal
53	AF	8/20/2009	Preliminary	Technical	TBD	M	Not Submitted	NAVAPS	11/23/2009	Minimal
54	AG	8/20/2009	Preliminary	Technical	TBD	M	Not Submitted	NAVAPS	11/23/2009	Minimal
55	AH	8/20/2009	Preliminary	Technical	TBD	M	Not Submitted	NAVAPS	11/23/2009	Minimal

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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	P6.10.5.3	SCPS2 Score less than 90%	4/30/2009	Alleged	Submitted	Review Plan	10/30/2009	Medium
2	P8.1.3.2	Planned Outage and Maintenance Outage	5/12/2009	Alleged	Completed	Verify Complete Plan	10/16/2009	Medium
3	P6.10.5.3	SCPS2 Score less than 90%	6/9/2009	Alleged	Submitted	Approve Mitigation Plan	10/30/2009	Medium
4	OG8.3.3	QSE Responsibilities	9/24/2008	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	Submitted	Complete Plan ⁺	12/31/2009	Small
7	OG1.8.2	System Operating Training Requirements	6/2/2009	Initial	Not Submitted	Review Response	10/30/2009	Small
8	P6.10.5.4	Responsive Reserve Services Deployment	11/12/2008	Alleged	Completed	N/A	N/A	Minimal

*Next step is dependent on entity

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