

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

	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
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*	N/A	N/A	Minimal
37	E	3/5/2008	Preliminary	Admin	M	M	Completed & Confirmed*	N/A	N/A	Minimal
38	T	10/20/2008	Alleged	Technical	L	M	Completed*	Settlement Agreement+		Minimal
39	T	10/20/2008	Alleged	Technical	S	H	Completed*	Settlement Agreement+		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
43	F	11/18/2008	Preliminary	Technical	TBD	M	Completed*	Settlement Agreement	12/18/2009	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
44	F	11/18/2008	Preliminary	Technical	S	M	Completed*	Settlement Agreement	12/18/2009	Minimal
45	Z	12/18/2008	Preliminary	Technical	TBD	H	Approval (by NERC)	NAVAPS	12/18/2009	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	12/18/2009	Minimal
48	T	8/25/2009	Preliminary	TBD	TBD	TBD	Completed*	Settlement Agreement+		Minimal
49	T	8/25/2009	Preliminary	TBD	TBD	TBD	Completed*	Settlement Agreement+		Minimal
50	AC	6/2/2009	Preliminary	Technical	TBD	M	Approval (by NERC)	NAVAPS	12/11/2009	Minimal
51	AD	8/20/2009	Preliminary	Technical	TBD	M	Not Submitted	NAVAPS	12/18/2009	Minimal
52	AE	8/20/2009	Preliminary	Technical	TBD	M	Not Submitted	NAVAPS	12/18/2009	Minimal
53	AF	8/20/2009	Preliminary	Technical	TBD	M	Not Submitted	NAVAPS	12/18/2009	Minimal
54	AG	8/20/2009	Preliminary	Technical	TBD	M	Not Submitted	NAVAPS	12/18/2009	Minimal
55	AH	8/20/2009	Preliminary	Technical	TBD	M	Not Submitted	NAVAPS	12/18/2009	Minimal
56	AI	11/11/2009	Preliminary	Technical	TBD	H	Not Submitted	NAVAPS	11/20/2009	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
--	--------	----------------	------------------	----------	-----	-----	------------------------	---------------------	-------------------------------------	---

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	12/4/2009	Medium
2	P8.1.3.2	Planned Outage and Maintenance Outage	5/12/2009	Alleged	Completed	N/A	N/A	Medium
3	P6.10.5.3	SCPS2 Score less than 90%	6/9/2009	Alleged	Submitted	Approve Mitigation Plan	11/30/2009	Medium
4	OG1.8.2	System Operating Training Requirements	1/13/2009	Alleged	Submitted	Complete Plan <sup>+</sup>	12/31/2009	Small
5	OG1.8.2	System Operating Training Requirements	4/20/2009	Alleged	Submitted	Complete Plan <sup>+</sup>	12/31/2009	Small
6	OG1.8.2	System Operating Training Requirements	6/2/2009	Initial	Not Submitted	Review Response	12/4/2009	Small

<sup>+</sup>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

<sup>+</sup>Next step is dependent on entity