

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 (NERC) | | Large |
| 2 | T | 10/20/2008 | Alleged | Technical | H | M | Completed* | Settlement Agreement (NERC) | | Large |
| 3 | T | 10/20/2008 | Alleged | Technical | H | M | Completed* | Settlement Agreement (NERC) | | Large |
| 4 | T | 10/20/2008 | Alleged | Technical | S | H | Completed* | Settlement Agreement (NERC) | | Large |
| 5 | T | 10/20/2008 | Alleged | Technical | H | H | Completed* | Settlement Agreement (NERC) | | 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 (NERC) | | Medium |
| 8 | W | 11/17/2008 | Preliminary | Technical | S | H | Completed* | Settlement Agreement | 1/22/2010 | Medium |
| 9 | Q | 9/22/2008 | Preliminary | Technical | S | H | Completed | Settlement Agreement | 2/5/2010 | Small |
| 10 | U | 9/24/2008 | Alleged | Technical | S | H | Completed* | Settlement Agreement | 2/15/2010 | Small |
| 11 | F | 10/10/2008 | Preliminary | Technical | M | H | Approval (by NERC)* | Settlement Agreement | 2/19/2010 | Small |
| 12 | V | 11/3/2008 | Preliminary | Technical | S | H | Not Submitted | Mitigation Plan Submission | 2/4/2010 | Small |
| 13 | V | 11/3/2008 | Preliminary | Technical | S | M | Not Submitted | Mitigation Plan Submission | 2/4/2010 | Small |
| 14 | AC | 6/2/2009 | Preliminary | Technical | TBD | H | Approval (by NERC) | NAVAPS | 3/22/2010 | Small |
| 15 | AC | 6/2/2009 | Preliminary | Technical | TBD | H | Approval (by NERC) | NAVAPS | 3/22/2010 | Small |
| 16 | F | 6/8/2009 | Preliminary | Technical | TBD | H | Approval (by NERC) | Settlement Agreement | 2/19/2010 | 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 |

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|----|--------|----------------|------------------|-----------|-----|-----|------------------------|-----------------------------|-------------------------------------|---|
| 21 | A | 10/3/2007 | Confirmed | Admin | S | M | New Plan Submitted | Approval (by NERC) | | Minimal |
| 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 (NERC) | | Minimal |
| 39 | T | 10/20/2008 | Alleged | Technical | S | H | Completed* | Settlement Agreement (NERC) | | 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 |

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|----|--------|----------------|------------------|-----------|-----|-----|------------------------|----------------------|-------------------------------------|---|
| 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 | 2/19/2010 | Minimal |
| 44 | F | 11/18/2008 | Preliminary | Technical | S | M | Completed* | Settlement Agreement | 2/19/2010 | Minimal |
| 45 | Z | 12/18/2008 | Preliminary | Technical | TBD | H | Approval (by NERC) | NAVAPS | 3/1/2010 | 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 | 2/19/2010 | 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 | 3/1/2010 | Minimal |
| 51 | AD | 8/20/2009 | Preliminary | Technical | TBD | M | Not Submitted | NAVAPS | 3/15/2010 | Minimal |
| 52 | AE | 8/20/2009 | Preliminary | Technical | TBD | M | Not Submitted | NAVAPS | 3/15/2010 | Minimal |
| 53 | AF | 8/20/2009 | Preliminary | Technical | TBD | M | Not Submitted | NAVAPS | 3/15/2010 | Minimal |
| 54 | AG | 8/20/2009 | Preliminary | Technical | TBD | M | Not Submitted | NAVAPS | 3/15/2010 | Minimal |
| 55 | AH | 8/20/2009 | Preliminary | Technical | TBD | M | Not Submitted | NAVAPS | 3/15/2010 | Minimal |
| 56 | AI | 11/11/2009 | Preliminary | Technical | TBD | H | Submitted | NAVAPS | 3/1/2010 | Minimal |
| 57 | AJ | 12/17/2009 | Preliminary | Technical | TBD | H | Not Submitted | NAVAPS | 3/12/2010 | 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 | Completed | Review Plan | 1/29/2010 | Medium |
| 2 | P6.10.5.3 | SCPS2 Score less than 90% | 6/9/2009 | Alleged | Submitted | Approve Mitigation Plan | 1/19/2010 | Medium |
| 3 | OG1.8.2 | Training Requirements | 1/13/2009 | Alleged | Submitted | Verify Completion | 1/25/2010 | Small |
| 4 | OG1.8.2 | Training Requirements | 4/20/2009 | Alleged | Submitted | Verify Completion | 1/25/2010 | Small |
| 5 | OG1.8.2 | Training Requirements | 6/2/2009 | Initial | Not Submitted | Review Response | 1/29/2010 | Small |

*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