

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*	FERC Approval	5/3/2010	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	4/19/2010	Medium
9	AM	2/24/2010	Preliminary	Technical	TBD	M	Not Submitted	NAVAPS	4/30/2010	Medium
10	AO	3/24/2010	Preliminary	Admin	TBD	M	Approval (by NERC)	Settlement Agreement	5/31/2010	Medium
11	AP	4/2/2010	Preliminary	Technical	TBD	M	Not Submitted	NAVAPS	5/31/2010	Medium
12	Q	9/22/2008	Alleged	Technical	S	H	Completed	Settlement Agreement	5/24/2010	Small
13	U	9/24/2008	Alleged	Technical	S	H	Completed*	Settlement Agreement	5/21/2010	Small
14	F	10/10/2008	Preliminary	Technical	M	H	Approval (by NERC)*	Settlement Agreement	5/3/2010	Small
15	V	11/3/2008	Alleged	Technical	S	H	Approval (by NERC)	Notice of Confirmed Violation	5/3/2010	Small
16	V	11/3/2008	Alleged	Technical	S	M	Approval (by NERC)	Notice of Confirmed Violation	5/3/2010	Small
17	AC	6/2/2009	Preliminary	Technical	TBD	H	Completed	NAVAPS	4/19/2010	Small
18	AC	6/2/2009	Preliminary	Technical	TBD	H	Completed	NAVAPS	4/19/2010	Small
19	F	6/8/2009	Preliminary	Technical	TBD	H	Approval (by NERC)	Settlement Agreement	5/3/2010	Small
20	AN	10/1/2009	Preliminary	Technical	TBD	M	Not Submitted	NAVAPS		Small

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21	T	10/20/2008	Alleged	Technical	S	H	Completed*	Settlement Agreement (NERC)		Small
22	A	10/3/2007	Confirmed	Admin	S	L	Completed	FERC Filing	5/21/2010	Minimal
23	A	10/3/2007	Confirmed	Admin	S	L	Completed	FERC Filing	5/21/2010	Minimal
24	A	10/3/2007	Confirmed	Admin	S	L	Completed	FERC Filing	5/21/2010	Minimal
25	A	10/3/2007	Confirmed	Technical	L	H	Approved, Completed	N/A	N/A	Minimal
26	C	1/23/2008	Confirmed	Admin	L	M	Completed & Verified	N/A	N/A	Minimal
27	C	1/23/2008	Confirmed	Admin	H	M	Completed & Verified	N/A	N/A	Minimal
28	T	10/20/2008	Alleged	Technical	L	M	Completed*	Settlement Agreement (NERC)		Minimal
29	F	11/18/2008	Preliminary	Technical	TBD	M	Completed*	Settlement Agreement	5/3/2010	Minimal
30	F	11/18/2008	Preliminary	Technical	S	M	Completed*	Settlement Agreement	5/3/2010	Minimal
31	Z	12/18/2008	Preliminary	Technical	TBD	H	Approval (by NERC)	NAVAPS	4/26/2010	Minimal
32	F	6/8/2009	Preliminary	Technical	TBD	M	Approval (by NERC)*	Settlement Agreement	5/3/2010	Minimal
33	T	8/25/2009	Preliminary	TBD	TBD	TBD	Completed*	Settlement Agreement		Minimal
34	T	8/25/2009	Preliminary	TBD	TBD	TBD	Completed*	Settlement Agreement		Minimal
35	AC	6/2/2009	Preliminary	Technical	TBD	M	Completed	NAVAPS	4/19/2010	Minimal
36	AD	8/20/2009	Preliminary	Technical	TBD	M	Not Submitted	NAVAPS	4/30/2010	Minimal
37	AE	8/20/2009	Preliminary	Technical	TBD	M	Not Submitted	NAVAPS	4/30/2010	Minimal
38	AF	8/20/2009	Preliminary	Technical	TBD	M	Not Submitted	NAVAPS	4/30/2010	Minimal
39	AG	8/20/2009	Preliminary	Technical	TBD	M	Not Submitted	NAVAPS	4/30/2010	Minimal
40	AH	8/20/2009	Preliminary	Technical	TBD	M	Not Submitted	NAVAPS	4/30/2010	Minimal
41	AI	11/11/2009	Preliminary	Technical	TBD	H	Submitted	Settlement Agreement	4/30/2010	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
42	AJ	12/17/2009	Preliminary	Technical	TBD	H	Approval (by NERC)	Settlement Agreement	5/27/2010	Minimal
43	AK	2/24/2010	Preliminary	Technical	TBD	H	Approval (by NERC)	Settlement Agreement	5/21/2010	Minimal
44	AL	2/24/2010	Preliminary	Technical	TBD	M	Submitted	NAVAPS	5/14/2010	Minimal

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

	Violation Date	Violation Status	Mitigation Plan Status	Next Status Step	Estimated Date of Next Step	Texas RE Assessment of Reliability Impact
1	4/30/2009	Alleged	Completed	Review Plan	5/7/2010	Medium
2	6/9/2009	Alleged	Submitted	Approve Mitigation Plan	5/7/2010	Medium
3	1/13/2009	Alleged	Submitted	Verify Completion	5/14/2010	Small
4	4/20/2009	Alleged	Completed	Verify Completion	4/30/2010	Small
5	6/2/2009	Initial	Not Submitted	Review Response	5/14/2010	Small

*Next step is dependent on entity

Legend:

Violation Status – Initial, Alleged, Confirmed

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