

NERC Standards Violations

	Entity	Violation Date	Violation Status	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	H	M	Completed*	Settlement Agreement (NERC)		Large
2	T	10/20/2008	Alleged	H	M	Completed*	Settlement Agreement (NERC)		Large
3	T	10/20/2008	Alleged	H	M	Completed*	Settlement Agreement (NERC)		Large
4	T	10/20/2008	Alleged	S	H	Completed*	Settlement Agreement (NERC)		Large
5	T	10/20/2008	Alleged	H	H	Completed*	Settlement Agreement (NERC)		Large
6	F	3/21/2008	Preliminary	S	H	Completed*	N/A	N/A	Medium
7	T	10/10/2008	Alleged	H	M	Submitted*	Settlement Agreement (NERC)		Medium
8	W	11/17/2008	Preliminary	S	H	Completed*	NERC Approval of Settlement Agreement		Medium
9	AM	2/24/2010	Preliminary	TBD	M	Not Submitted	NAVAPS	6/25/2010	Medium
10	AO	3/24/2010	Preliminary	TBD	M	Approval (by NERC)	Settlement Agreement	7/9/2010	Medium
11	AP	4/2/2010	Preliminary	TBD	M	Not Submitted	NAVAPS	6/25/2010	Medium
12	Q	9/22/2008	Alleged	S	H	Completed*	Settlement Agreement	7/9/2010	Small
13	U	9/24/2008	Alleged	S	H	Completed*	Settlement Agreement	7/9/2010	Small
14	F	10/10/2008	Preliminary	M	H	Completed*	Settlement Agreement	6/11/2010	Small
15	V	11/3/2008	Alleged	S	H	Completed	Notice of Penalty	5/21/2010	Small
16	V	11/3/2008	Alleged	S	M	Completed	Notice of Penalty	5/21/2010	Small
17	AC	6/2/2009	Preliminary	TBD	H	Completed	NAVAPS	6/1/2010	Small
18	AC	6/2/2009	Preliminary	TBD	H	Completed	NAVAPS	6/1/2010	Small
19	F	6/8/2009	Preliminary	TBD	H	Completed*	Settlement Agreement	6/11/2010	Small
20	AN	10/1/2009	Preliminary	TBD	M	Not Submitted	Settlement Agreement	6/30/2010	Small

	Entity	Violation Date	Violation Status	VSL	VRF	Mitigation Plan Status	Next Step(s) Needed	Deadline for Finishing Next Step(s)	Texas RE Assessment of Reliability Impact
21	T	10/20/2008	Alleged	S	H	Completed*	Settlement Agreement (NERC)		Small
22	A	10/3/2007	Confirmed	S	L	Completed	FERC Filing	6/30/2010	Minimal
23	A	10/3/2007	Confirmed	S	L	Completed	FERC Filing	6/30/2010	Minimal
24	A	10/3/2007	Confirmed	S	L	Completed	FERC Filing	6/30/2010	Minimal
25	A	10/3/2007	Confirmed	L	H	Approved, Completed	N/A	N/A	Minimal
26	T	10/20/2008	Alleged	L	M	Completed*	Settlement Agreement (NERC)		Minimal
27	F	11/18/2008	Preliminary	TBD	M	Completed*	Settlement Agreement	6/11/2010	Minimal
28	F	11/18/2008	Preliminary	S	M	Completed*	Settlement Agreement	6/11/2010	Minimal
29	Z	12/18/2008	Preliminary	TBD	H	Completed	NAVAPS	6/1/2010	Minimal
30	F	6/8/2009	Preliminary	TBD	M	Completed*	Settlement Agreement	6/11/2010	Minimal
31	T	8/25/2009	Preliminary	TBD	TBD	Completed*	Settlement Agreement		Minimal
32	T	8/25/2009	Preliminary	TBD	TBD	Completed*	Settlement Agreement		Minimal
33	AC	6/2/2009	Preliminary	TBD	M	Completed	NAVAPS	6/1/2010	Minimal
34	AD	8/20/2009	Preliminary	TBD	M	Not Submitted	NAVAPS	7/16/2010	Minimal
35	AE	8/20/2009	Preliminary	TBD	M	Not Submitted	NAVAPS	7/16/2010	Minimal
36	AF	8/20/2009	Preliminary	TBD	M	Not Submitted	NAVAPS	7/16/2010	Minimal
37	AG	8/20/2009	Preliminary	TBD	M	Not Submitted	NAVAPS	7/16/2010	Minimal
38	AH	8/20/2009	Preliminary	TBD	M	Not Submitted	NAVAPS	7/16/2010	Minimal
39	AI	11/11/2009	Preliminary	TBD	H	Submitted	Settlement Agreement	6/30/2010	Minimal
40	AJ	12/17/2009	Preliminary	TBD	H	Completed	NAVAPS	6/30/2010	Minimal
41	AK	2/24/2010	Preliminary	TBD	H	Completed*	Settlement Agreement	7/9/2010	Minimal

	Entity	Violation Date	Violation Status	VSL	VRF	Mitigation Plan Status	Next Step(s) Needed	Deadline for Finishing Next Step(s)	Texas RE Assessment of Reliability Impact
42	AL	2/24/2010	Preliminary	TBD	M	Completed*	NAVAPS	7/30/2010	Minimal
43	AP	4/2/2010	Preliminary	TBD	M	Not Submitted	NAVAPS	7/30/2010	Minimal
44	AQ	1/21/2010	Preliminary	TBD	H	Submitted	NAVAPS	7/12/2010	Minimal
45	E	1/29/2010	Preliminary	TBD	M	Not Submitted	NAVAPS	7/30/2010	Minimal
46	AS	1/14/2008	Preliminary	TBD	H	Submitted	NAVAPS	7/30/2010	Minimal
47	AS	1/14/2008	Preliminary	TBD		Submitted	NAVAPS	7/30/2010	Minimal
48	AT	4/15/2010	Preliminary	TBD	H	Not Submitted	NAVAPS	7/30/2010	Minimal
49	AT	4/15/2010	Preliminary	TBD	M	Not Submitted	NAVAPS	7/30/2010	Minimal

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

Entity	Violation Date	Violation Status	Mitigation Plan Status	Next Status Step	Estimated Date of Next Step	Texas RE Assessment of Reliability Impact
L	4/30/2009	Alleged	Completed	Review Plan	6/21/2010	Medium
L	6/9/2009	Alleged	Submitted	Approve Mitigation Plan	6/21/2010	Medium
Y	1/13/2009	Alleged	Submitted	Verify Completion	6/21/2010	Small
F	4/20/2009	Alleged	Completed	N/A	N/A	Small
D	6/2/2009	Initial	Not Submitted	Review Response	6/21/2010	Small
AR	4/7/2010	Alleged	Submitted	Mitigation Plan Completion	6/30/2010	Small
AU	5/27/2010	Alleged	Not Submitted	Mitigation Plan Submission	6/28/2010	Small

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