



Midwest Reliability Organization (MRO)

2007 Regional Compliance Monitoring and Enforcement Implementation Plan

Revised July 12, 2007

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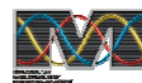
1: Implementation Plan Introductory Statement

NERC Compliance Program Implementation Plan

NERC will maintain and update the NERC Compliance Program Implementation Plan (“NERC Implementation Plan”) to be carried out by Compliance Enforcement Authorities in the performance of their responsibilities and duties in implementing the NERC Compliance Monitoring and Enforcement Program. The NERC Implementation Plan will specify the Reliability Standards that require reporting by Registered Entities to the Compliance Enforcement Authority. The NERC Implementation Plan will be posted on the NERC web site.

MRO Compliance Program Implementation Plan

The MRO shall submit a “Regional Implementation Plan” for the following calendar year to NERC for approval. The Regional Implementation Plan shall encompass activities designed to monitor, evaluate, enforce, assess, and report on compliance by Registered Entities with all Reliability Standards that have been designated to be actively monitored by the NERC Implementation Plan. The Regional Implementation Plan and other MRO relevant Compliance Program documents shall be posted on the MRO web site. MRO staff will update the plan and associated documents as required, and will provide notices on upcoming compliance requirements to the Registered Entities.

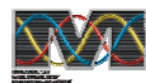


2: Regional Implementation Plan

This plan is used by the Midwest Reliability Organization (MRO) to meet the requirements of the North American Electric Reliability Corporation (NERC) 2007 Compliance Monitoring and Enforcement Program (CMEP). NERC shall delegate compliance monitoring and enforcement activities to Regional Entities and Cross Border Regional Entities. The MRO is designed to operate under delegated authority as a Cross Border Regional Entity (CBRE). The MRO CMEP is designed to monitor, assess, and enforce compliance with Reliability Standards duly approved by the ERO and the regulatory authorities in the United States and Canada. The entities responsible for compliance with Reliability Standards are referred to as “Registered Entities.” Registered Entities are owners, operators, and users of the bulk-power system that have at least one functional responsibility defined in any of the approved NERC or Regional Entity Reliability Standards.

In the United States, NERC has delegated its compliance and enforcement authority to each Regional Entity. The MRO is the Regional Entity for Registered Entities within the MRO corporate footprint, in accordance with the approved delegation agreement. In addition, the MRO will have similar delegation agreements with Saskatchewan and Manitoba. In the lieu of the provincial agreements, MRO will rely on its membership agreement and bylaws to enforce reliability standards in the two provinces. These delegated functions include but are not limited to data gathering, data reporting, monitoring, investigations, auditing activities, evaluating and determining compliance and non-compliance, imposing penalties and sanctions, and approving and tracking mitigation plans. NERC will oversee and monitor the MRO to assure the CMEP is performed in accordance with the delegation agreement and carried out in a fair, non-discriminatory manner. This document is consistent with the processes outlined in the uniform NERC CMEP.

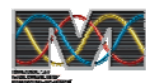
A Registered Entity's acceptance of sanctions and penalties, mitigation plans or other remedial actions shall not be construed as an acceptable alternative to any Registered Entity's continued obligation to comply with the Reliability Standards.



The MRO will monitor, assess, and enforce compliance with the standards and specific requirements for each Registered Entity that has compliance responsibilities as defined in its registration. Registration requirements are provided by NERC and the MRO will carry out those responsibilities. The MRO will make its best efforts to register all entities subject to the Reliability Standards and will provide the ERO and other applicable authorities' revisions to the list as appropriate.

The MRO compliance and enforcement functions are designed to be executed in a fair, non-discriminatory manner that affords all Registered Entities with adequate due process. MRO staff shall make all initial assessments of non-compliance and enforcement actions. The MRO shall provide for a review of findings with the MRO Compliance Committee and a hearing with the MRO Board of Directors if a Registered Entity disputes findings. All Registered Entities shall have the right to appeal a decision by the MRO to NERC.

Please refer to the MRO process map attached (**Attachment A**).



3) NERC Compliance Monitoring and Enforcement Program (CMEP)

A. Responsibilities

NERC

It is the responsibility of NERC to oversee the reliability of the bulk power system in North America. NERC shall ensure there is a comparable and consistent plan for each Regional Entity or CBRE to monitor and enforce compliance. CBREs may establish additional policies or standards. However, this is in addition to and not in lieu of the NERC Compliance Monitoring and Enforcement Program.

Midwest Reliability Organization (Cross Border Regional Entity)

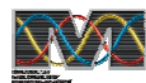
Each Regional Entity has the responsibility to comply with the NERC requirements consistent with the delegation agreement. This includes the administrative function of compiling the required data and adequately staffing to support the compliance program. The MRO shall be responsible for performing compliance audits of Registered Entities within the MRO corporate region as defined in the delegation agreement.

Registered Entity

An owner, operator, or users of the bulk power system that have responsibility for meeting at least one requirement as defined in the NERC and regional Reliability Standards. The MRO Registry is posted on the MRO web site.

B. NERC Compliance Program Overview

The NERC CMEP is the program used by NERC and the MRO to monitor, assess, and enforce compliance with Reliability Standards for Registered Entities in the U.S. This is accomplished through compliance monitoring and compliance audits. The regional compliance monitoring and enforcement program shall be implemented by the MRO for the two Canadian provinces (Saskatchewan and Manitoba) in which it has responsibility. The CMEP shall be administered consistent with Canadian laws and agreements.



The annual program includes monitoring the compliance of a specific subset of reliability standards. This subset of “actively monitored” reliability standards is determined in conjunction with the other Regional Entities and NERC to ensure uniform compliance monitoring. However, it should be noted that a Registered Entity can be monitored for any and all applicable standards at any time.

Compliance audits shall be scheduled to accommodate compliance reporting requirements. All reliability standards are subject to audit. Compliance audits will be conducted by MRO staff on a three-year cycle for Registered Entities performing the Balancing Authority (BA), Transmission Operator (TOP), and Reliability Coordinator (RC) functions. Compliance audits for Registered Entities performing all other functions will be conducted on a six-year cycle. The frequency of audits can be shortened if deemed necessary.

1. Key Reliability Elements

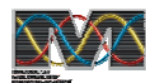
- Identify Standards to be Monitored
- Measure Performance Relative to the Standards
- Ensure Compliance with Standards (enforcement)
- Develop a Process to Mitigate Violations
- Violation Reporting and Disclosure
- Process for Hearing and Appeal

2. Compliance Program

The Compliance Program is the process, procedures, and timeline to be followed for evaluating and assessing compliance with the NERC and MRO regional Reliability Standards by all Registered Entities listed in the MRO Registry.

3. Compliance Program Processes

Compliance Programs are used to monitor and measure system quantities and performance to determine compliance with the NERC and MRO regional Reliability Standards. Responsible entities found to be non-compliant shall submit mitigation plans to rectify the non-compliance findings.



4. Enforcement Process

The Enforcement Process is used to assess the findings, determine compliance results, and administer sanctions and penalties.

5. Disclosure

Compliance reports shall identify violations to the Standards and shall include the names of the violating party(s). See the NERC web site (www.nerc.com) for full documentation on Disclosure.

6. Participants in the Compliance Program

- NERC (acting as the Electric Reliability Organization – ERO)
- MRO (a Cross Border Regional Entity)
- Registered Entities
 - Balancing Authority
 - Distribution Provider
 - Generator Operator
 - Generator Owner
 - Load Serving Entity
 - Planning Authority
 - Purchase Selling Entity
 - Reliability Coordinator
 - Resource Planner
 - Reserve Sharing Group
 - Transmission Operator
 - Transmission Owner
 - Transmission Planner
 - Transmission Service Provider



4: MRO Compliance Monitoring and Enforcement Program

A. Introduction

This section describes the MRO compliance processes used to monitor and determine compliance of Registered Entities with the NERC and MRO regional Reliability Standards. Details of the MRO compliance monitoring processes can be found in the MRO Compliance Monitoring and Enforcement Program Manual. The MRO CMEP Manual is posted on the MRO web site.

MRO staff (with approval from NERC) determines the type of monitoring process used for each standard. All requests for information will be sent to the Primary Compliance Contact (PCC). Any person responsible for the information of a Registered Entity may forward the information to the MRO staff, with copies to the PCC. The PCC is the Registered Entity's designated contact person responsible for coordination and dissemination of compliance requirements, reporting, and data submittals to the MRO.

B. Compliance Data Management System

In the MRO Region, the Compliance Data Management System (CDMS) is used by Registered Entities for data submittal to MRO, and by MRO staff for data review and compliance assessment.

C. Compliance Program Summary

The defined subset of standards used for assessing compliance by all Regional Entities during the year (annual program) is determined by NERC and the Regional Entities. Regional Entities are allowed to add requirements to the individual regional compliance program as deemed necessary by the Regional Entity. **Attachment B** contains the list of “actively monitored” standards identified in the 2007 compliance review program.

In 2007, a total of **48** NERC standards have been identified to be actively monitored in the annual program, which encompass a total of **199** requirements. However, the **8** NERC CIP-002-1 through CIP-009-1 standards which encompass a total of **41**



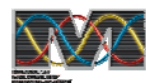
requirements will only be assessed by means of a special survey developed by NERC and where Registered Entities are to identify the status (progress status) per the tables found in **Attachment E** of this document. In 2007, compliance assessment and violation determination, as well as sanction and penalty will not occur for the CIP-002-1 through CIP-009-1 standards. For Registered Entities in the MRO the special NERC developed survey / questionnaire is accessed and submitted via the CDMS tool. All Registered Entities listed in the MRO Registry must complete the survey by no later than July 14, 2007. In addition, the MRO has identified 1 MRO standard (MRO-MBAL-002) which encompasses a total of 2 requirements as actively monitored (as of January 2007). The MRO requires self-certification submittals from all Registered Entities for the applicable functions in which they are registered, and specifically for the Reliability Standards identified as “actively monitored” in the 2007 program.

Registered Entities scheduled for compliance audits in 2007 will be assessed for compliance with all applicable requirements in the 2007 program for which the entity is responsible. **Attachment C** contains the 2007 compliance audit schedules. **Attachment D** contains a compliance schedule for self-certification and periodic data submittal.

NERC will continue the Readiness Evaluation program in 2007. Although the Readiness Evaluations are not a part of the compliance program, the NERC staff will report any suspected compliance violation to the NERC Director of Compliance who then notifies the MRO Compliance Manager. MRO staff will investigate all proposed violations. Any confirmed violation becomes part of the normal compliance program process, requiring a mitigation plan, correction, and tracking to completion.

The MRO compliance program consists of:

- Compliance audits for BA, TOP, and RC on a 3-year cycle (and as needed)
- Compliance audits for entities performing all other functions on a 6-year cycle (and as needed)
- Monitoring data and data submittals over various time periods
- Investigating those standards that are triggered by an event or complaint



- Measuring applicable standards by self-certification
- Perform a spot check of each Registered Entity for compliance with at least one standard for which the entity claimed to be “Fully Compliant” in the self-certification process
- Report the results of regional compliance monitoring, including disclosure, according to NERC guidelines

The MRO is responsible for disseminating information on new and revised requirements. This may be accomplished by committee reports, direct mailings, formal training/informational sessions, compliance web site, etc.

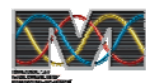
A team lead by MRO staff will perform all compliance audits of the Registered Entities, such that all Balancing Authorities, Transmission Operators, and Reliability Coordinators are audited at least once every three-years (or as needed), and Registered Entities performing all other functions will be audited at least once every six-years (or as needed). The audit team will measure compliance with the defined subset of “actively monitored” standards that are listed in this Implementation Plan.

The MRO will serve as the single point of contact for requests pertaining to compliance information from NERC and questions from Registered Entities, and coordinate as needed with other MRO committees.

- See the full calendar of compliance events at <http://www.midwestreliability.org/Compliance.html> .

D. Monitoring Sources

The Compliance Program uses eight monitoring processes to collect information in order to determine or assess compliance: (1) compliance audit, (2) self-certification, (3) spot (random) check, (4) compliance violation investigation, (5) self-reporting, (6) data submittals, (7) exception reporting, and (8) complaints.



1) Compliance Audit

Registered Entities

MRO staff shall perform comprehensive compliance audits to determine compliance with the Implementation Plan. Compliance audits are normally conducted on a three-year and a six-year cycle depending upon the function(s) performed by the Registered Entity. However, audits can be event-driven, special audit, or as requested by the MRO Board. The audit schedule for Registered Entities on the three-year cycle was determined prior to 2007 and will continue. The process performed by the MRO for creating the six-year audit schedule includes assigning a random number (or identifier) to each Registered Entity, and then performing a lottery (or electronic random selection) to create the six-year audit schedule. **Attachment C** contains the 2007 compliance audit schedules. The PCC shall be the responsible party to disseminate audit materials, and coordinate agendas and schedules.

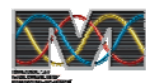
All Registered Entities are subject to audit for compliance with all Reliability Standards applicable to the functions for which the entity is registered. All compliance audits shall be conducted in accordance with audit guides established for the Reliability Standards in accordance with guidelines established by NERC.

NERC Review of Regional Entity

Each year NERC reviews and approves each Regional Entity's Implementation Plan. NERC performs an audit of the Regional Entity every three-years (or as needed).

2) Self Certification

Self-certification is limited to a specific set of actively monitored Reliability Standards. MRO staff may require documentation and other information be made available upon request, but does not require the data to be submitted until



requested. The data will be reviewed and validated via subsequent audits or specific requests and/or spot (*i.e.* random) checks on a periodic basis.

The self-certification compliance process for a specified Reliability Standard is submitted via the CDMS. In addition, a Corporate Signature Form must be signed by the individual responsible for the compliance program at the Registered Entity, attesting to the validity of the self certification submittal and notifying the MRO staff of the status of either fully compliant or some level of non-compliance. The MRO staff will review, assess, and determine the final status of compliance.

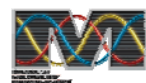
3) Spot (Random) Checking

Spot checking shall be conducted by MRO staff and may be initiated at any time to verify or confirm self-certification and periodic data submittal. Spot checking may be random or may be initiated in response to events, as described in the Reliability Standards, or by operating problems, system events, or complaints from within or outside of the MRO area of responsibility.

Spot checks are normally conducted annually and after the self-certification process has concluded. MRO staff is responsible for performing the spot check process. Spot checks can be used to verify or confirm data from a self-certification submittal where the status of full compliance was declared, and to ensure compliance to specific standards that MRO staff deems appropriate. Spot checks can take the form of an on-site review, or may be completed through off-site data submittal and review. The MRO staff reviews the information submitted to verify the Registered Entity's compliance with the Reliability Standard.

4) Investigation

A compliance violation investigation may be initiated at any time by MRO or NERC in response to a system disturbance, complaint, or possible violation with



a Reliability Standard as identified by any means. Compliance violation investigations will generally be led by MRO staff. However, for good cause, NERC reserves the right to assume the leadership of a compliance violation investigation.

Investigations are used to confirm or deny all alleged or probable violations identified by NERC, MRO, or other parties. MRO staff will investigate and determine if the alleged violation is confirmed or non-confirmed. If the event requires, MRO staff may at its discretion, use site visits, team investigations, data submittals, etc. to further determine the compliance and/or adherence to reliability standards pertinent to the event.

5) Self Reporting

Self-reporting is the identification and reporting by the Registered Entity of a violation to any reliability standard applicable to the functions performed by the entity as the result of a self-assessment or some other internal review process. A Registered Entity performs an internal review of the requirements of a standard, assessing how they are satisfying the requirements and notifying the MRO staff of any level of non-compliance or any change in the level of non-compliance to a specific standard. The MRO staff will review the information and determine formal findings of non-compliance.

Self-reporting of a violation with a Reliability Standard is encouraged regardless of whether the Reliability Standard requires reporting on a pre-defined schedule in the compliance program and the violation is determined outside the pre-defined reporting schedule. The MRO encourages Registered Entities to self-report each violation of a Reliability Standard at the time the Registered Entity becomes aware of the violation. If a Registered Entity self-reports to the MRO any level of violation, or a change in the level of a previously-reported violation with a Reliability Standard, the MRO shall review the Registered Entity's submittal and determine any initial findings of alleged violations. Self-reporting



will be considered a mitigating action when the MRO determines the appropriate sanction or penalty. Self-reporting a violation is completed via the CDMS.

6) Periodic Data Submittals

The MRO will require Periodic Data Submittals in accordance with the established schedule or on an ad hoc basis. This data may include data to support modeling, studies, analyses, documents, procedures, methodologies, operating data, and process information necessary to support the assessment of compliance with Reliability Standards. The MRO will provide notice to the Registered Entities of periodic data submittal requirements by posting the current data submittal reporting schedule on the MRO web site, and informs the Registered Entities of changes and/or updates.

Typically, periodic submittal consists of monthly, quarterly, and annual data submittals. These submittals are monitored for timeliness and quality.

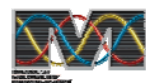
7) Exception Reporting

Some Reliability Standards require reporting of exceptions to compliance with the Reliability Standard as a form of compliance monitoring. The MRO shall require Registered Entities to provide Exception Reports identifying any violations to the extent required by any Reliability Standard.

The MRO shall also require Registered Entities to confirm the number of exceptions that have occurred in a given time period identified by NERC, even if the number of exceptions is zero.

8) Complaints

NERC or MRO may receive a complaint from individuals or entities alleging a violation with a Reliability Standard by one or more Registered Entities. The MRO will conduct a review of each complaint it receives to determine if the complaint provides sufficient basis for a compliance violation investigation, with an exception that NERC will review any complaint (1) that is related to MRO in its



performance related to the functions in the delegation agreement, (2) where the MRO determines it cannot conduct the review, or (3) if the complainant wishes to remain anonymous or specifically requests NERC to conduct the review of the compliant.

E. Mitigation Plan

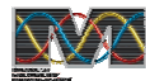
A Registered Entity found to be in violation with a Reliability Standard shall file with the MRO (i) a proposed Mitigation Plan to correct the violation or (ii) a description of how the violation has already been mitigated, (iii) any request for extension to an existing mitigation plan, and (iv) a report of a completed mitigation. Specific timing requirements for mitigation plan submittal can be found in the MRO CMEP Manual.

F. Enforcement

If the MRO determines a Registered Entity has violated a Reliability Standard, the MRO shall provide written notice of the alleged violation and sanction signed by an officer or designee to the Registered Entity (Primary Compliance Contact) and NERC. It should be noted that a sanction is not final until it is filed with and approved by FERC. Payment is due 30 days after FERC's acceptance.

The notice of alleged violation and sanction shall contain, at a minimum:

- (i) the Reliability Standard and provision thereof which the Registered Entity has violated,
- (ii) the date and time the alleged violation occurred (or is occurring),
- (iii) a summary of the facts as determined by the MRO demonstrating or constituting the alleged violation, and
- (iv) the proposed penalty or sanction, if any, determined by the MRO to be applicable to the violation in accordance with the NERC Sanction Guidelines, including an explanation of the basis on which the particular penalty or sanction was determined to be applicable.



The MRO may also issue an initial notice of alleged violation, without specifying the proposed penalty or sanction, to the Registered Entity.

G. Hearing Process

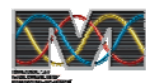
The MRO Hearing Process shall be available to a Registered Entity for contesting an alleged violation, penalty, sanction, mitigation plan requirement, or remedial action. The hearing body (MRO Board) shall issue a decision at the conclusion of the hearing and provide a report to the Registered Entity and NERC consistent with the delegation agreement.

Prior to initiation of a formal hearing with the MRO Board as described above, MRO staff, on behalf of the MRO, may agree on a settlement with a Registered Entity for a specific occurrence of non-compliance. The MRO Compliance Committee may provide technical reviews and provide technical support as needed. Any settlement must be approved by the Board. Specific details pertaining to the MRO hearing process can be found in the MRO CMEP Manual.

Settlements need to be filed and accepted at FERC to be final.

H. NERC Appeal Process

If the appeal by a Registered Entity has been heard by the MRO Board and the Registered Entity remains unsatisfied with the result, the Registered Entity has the option of proceeding with an appeal to NERC. During the appeal process, only the information submitted to the MRO during the hearing process will be allowed to be forwarded to NERC. New information cannot be included in the appeals process. If NERC agrees with the MRO, the process is complete. If the Registered Entity remains unsatisfied with the result, the Registered Entity may proceed to FERC and eventually to court. For Canadian provinces, the process follows the laws and authority in Canada.



I. Data Collection and Retention

The CDMS will be used for data entry, reporting and archiving. The MRO will ensure all data, both hard copy and electronic, is maintained in a secure location, according to the records management and retention requirements as identified in the NERC CMEP.



5: MRO Compliance Program Supporting Documentation

A. Methods of Measurement

The NERC Reliability Standards are posted on the NERC web site, and the MRO Standards on the MRO web page. **Attachment B** of this document provides a list of the 2007 “actively monitored” standards. A list of the FERC Approved Reliability Standards is also posted on the MRO compliance program web page at (<http://www.midwestreliability.org/Compliance.html>).

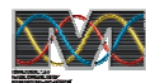
B. Communication Plan / Supporting Documentation

The following documentation and information shall be posted on the MRO Compliance website.

- NERC CMEP
- MRO CMEP Manual
- MRO Reliability Manual (hotlink)
- MRO Regional Compliance Monitoring and Enforcement Implementation Plan
- MRO Regional Compliance Registry
- List of FERC Approved Standards
- Standard / Requirement / Functional Entity Matrix
- Registered Entity Compliance Contact Information
- Calendar of Events and Pertinent Dates
- Archived Compliance Program Information

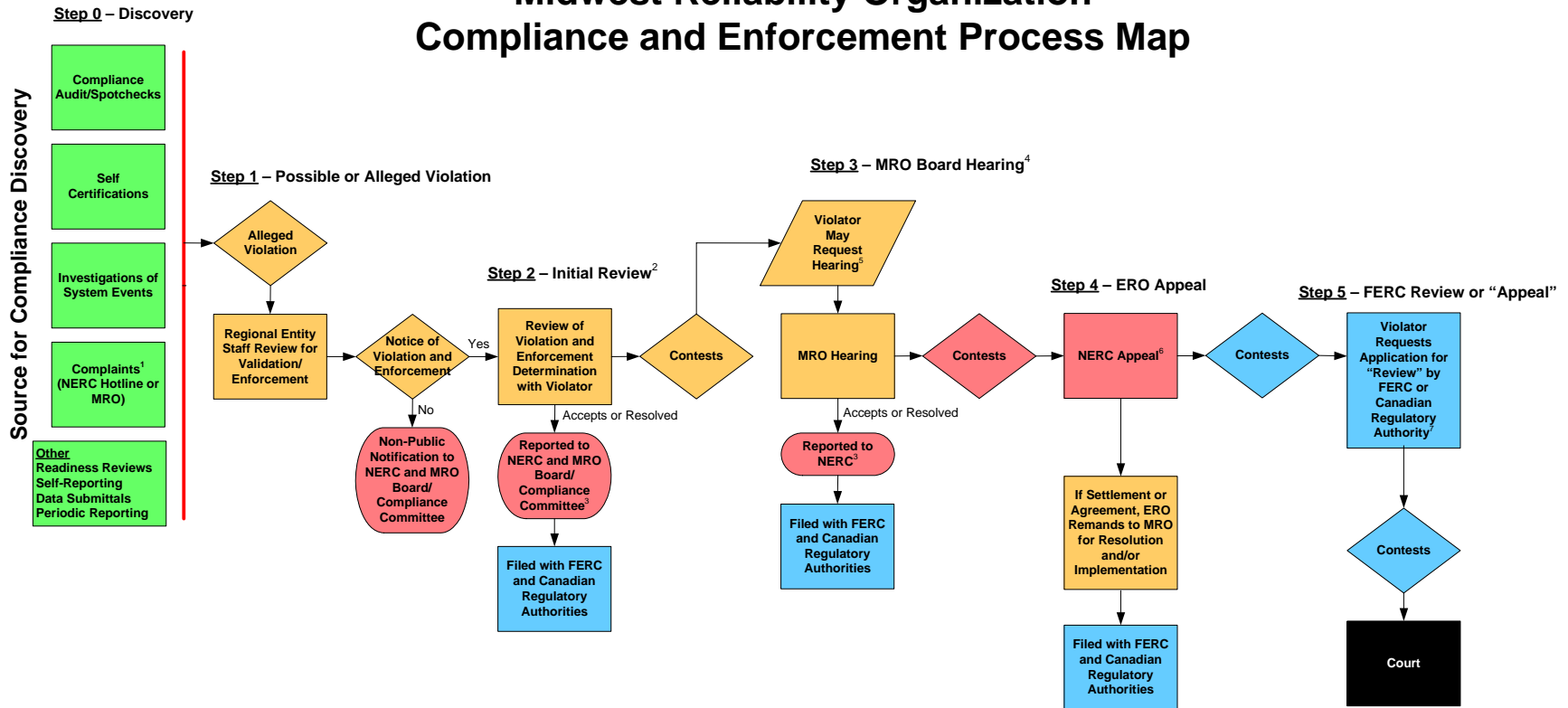
References

- NERC web site (<http://www.nerc.com>)
- MRO Compliance Website (<http://www.midwestreliability.org/Compliance.html>)
- MRO Reliability Manual (<http://www.mapp.org/content/reliabilityhandbook.shtml>)
- MRO Compliance Data Management System
(http://www.midwestreliability.org/CDMS_db.html)



Attachment A – MRO Compliance and Enforcement Process Map

Midwest Reliability Organization Compliance and Enforcement Process Map



¹Whistleblower policy primarily used for complaints other than compliance.
²Staff may include Compliance Committee to review facts and circumstances of violation.
³NERC may request reconsideration by the MRO (remand back to the RE). MRO Board approves all enforcement actions.
⁴MRO Board may consider/approve a settlement.
⁵MRO Compliance Committee and staff prepare report to Board.
⁶NERC appeal cannot include "new" information.
⁷If no Canadian regulatory authority, proceed directly to court.

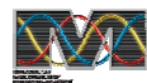


Attachment B - 2007 Actively Monitored Standards

Note: The actively monitored standards listed below have been approved by FERC except the CIP-002 through CIP-009 which will only be assessed through special survey and where Registered Entities indicate the status per the tables found in Attachment D.

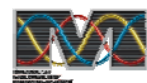
2007 CEP Matrix NERC Reliability Standards											
Std #	Requirements	Standard	Who	Purpose	NERC 48-hour	3-Year On-Site Audit	Self-Certification	Monthly/Quarterly Reporting	Data Submission	Exception Reporting	Investigation
BAL-001-0	All	Real Power Balancing Control Performance	BA	To maintain Interconnection steady-state frequency within defined limits by balancing real power demand and supply in real-time.				M	√		
BAL-002-0	All	Disturbance Control Performance	BA, RSG, RRO	To ensure the Balancing Authority is able to utilize its Contingency Reserve to balance resources and demand and return Interconnection frequency within defined limits.				Q	√		
BAL-003-0	All	Frequency Response and Bias	BA	This standard provides a consistent method for calculating the Frequency Bias component of ACE.						√	
CIP-001-1	All	Sabotage Reporting	RC, BA, TOP, GOP, LSE	Disturbances or unusual occurrences, suspected or determined to be caused by sabotage, shall be reported to the appropriate systems, governmental agencies, and regulatory bodies.			√				
CIP-002-1 through CIP-009-1	All	Critical Infrastructure Protection Standards	BA, GO, GOP, IA, LSE, NERC, RC, RRO, TO, TOP, TSP	Cyber Security Standards- Follow revised Implementation Plan for Cyber Security Standards CIP-002-1 through CIP-009-1			√				
COM-001-1	R2 and R5	Telecommunications	TO, BA, RC, NERCNet User Organizations	Each Reliability Coordinator, Transmission Operator and Balancing Authority needs adequate and reliable telecommunications facilities internally and with others for the exchange of Interconnection and operating information necessary to maintain reliability.			√				
EOP-001-0	All	Emergency Operations Planning	BA, TOP	Each Transmission Operator and Balancing Authority needs to develop, maintain, and implement a set of plans to mitigate operating emergencies. These plans need to be coordinated with other Transmission Operators and Balancing Authorities, and the Reliability Coordinator.			√				
EOP-003-1	All	Load Shedding Plans	BA, TOP	A Balancing Authority and Transmission Operator operating with insufficient generation or transmission capacity must have the capability and authority to shed load rather than risk an uncontrolled failure of the Interconnection.			√				
EOP-005-1	All	System Restoration Plans	BA, TOP	To ensure plans, procedures, and resources are available to restore the electric system to a normal condition in the event of a partial or total shut down of the system			√				

EOP-006-1	All	Reliability Coordination – System Restoration	RC	The Reliability Coordinator must have a coordinating role in system restoration to ensure reliability is maintained during restoration and priority is placed on restoring the Interconnection.			√					
EOP-008-0	All	Plans for Loss of Control Center Functionality	BA, RC, TOP	Each reliability entity must have a plan to continue reliability operations in the event its control center becomes inoperable.			√					
EOP-009-0	All	Documentation of Blackstart Generating Unit Test Results	GO, GOP	To ensure that the quantity and location of system blackstart generators are sufficient and that they can perform their expected functions.			√					
FAC-003-1	All	Vegetation Management	RRO, TO	To improve the reliability of the electric transmission systems by preventing outages from vegetation located on transmission rights-of-way (ROW) and minimizing outages from vegetation located adjacent to ROW, maintaining clearances between transmission lines			√	Q				
FAC-008-1	All	Facility Ratings Methodology	GO, TO	To ensure that Facility Ratings used in the reliable planning and operation of the Bulk Electric System (BES) are determined based on an established methodology			√					
FAC-009-1	All	Establish and Communicate Facility Ratings	GO, TO	To ensure that Facility Ratings used in the reliable planning and operation of the Bulk Electric System (BES) are determined based on an established methodology or methodologies.			√					
IRO-001-1	All	Reliability Coordination – Responsibilities and Authorities	BA, GOP, LSE, PSE, RC, RRO, TOP, TSP	Reliability Coordinators must have the authority, plans, and agreements in place to immediately direct reliability entities within their Reliability Coordinator Areas to re-dispatch generation, reconfigure transmission, or reduce load to mitigate critical conditions to return the system to a reliable state. If a Reliability Coordinator delegates tasks to others, the Reliability Coordinator retains its responsibilities for complying with NERC and regional standards. Standards of conduct are necessary to ensure the Reliability Coordinator does not act in a manner that favors one market participant over another.			√					
IRO-004-1	All	Reliability Coordination — Operations Planning	BA, GO, GOP, LSE, RC, TO, TOP, TSP	Each Reliability Coordinator must conduct next-day reliability analyses for its Reliability Coordinator Area to ensure the Bulk Electric System can be operated reliably in anticipated normal and Contingency conditions.			√				√	
IRO-014-1	All	Procedures, Processes, or Plans to Support Coordination Between Reliability Coordinators	RC	To ensure that each Reliability Coordinator's operations are coordinated such that they will not have an Adverse Reliability Impact on other Reliability Coordinator Areas and to preserve the reliability benefits of interconnected operations.			√					
IRO-015-1	All	Notifications and Information Exchange Between Reliability Coordinators	RC	To ensure that each Reliability Coordinator's operations are coordinated such that they will not have an Adverse Reliability Impact on other Reliability Coordinator Areas and to preserve the reliability benefits of interconnected operations.			√					



Program Section 5.2 – 2007 Midwest Reliability Organization Implementation Plan

IRO-016-1	All	Coordination of Real-time Activities Between Reliability Coordinators	RC	that they will not have an Adverse Reliability Impact on other Reliability Coordinator Areas			√					
PER-002-0	All	Operating Personnel Training	BA, TOP	Each Transmission Operator and Balancing Authority must provide their personnel with a coordinated training program that will ensure reliable system operation.			√					
PER-003-0	All	Operating Personnel Credentials	BA, RC, TOP	Certification of operating personnel is necessary to ensure minimum competencies for operating a reliable Bulk Electric System.							√	
PER-004-1	All	Reliability Coordination — Staffing	RC	Reliability Coordinators must have sufficient, competent staff to perform the Reliability Coordinator functions.			√					
PRC-004-1	All	Analysis and Mitigation of Transmission and Generation Protection System Misoperations	DP*, GO, TO	Provide trip operation / misoperation information per regional process.			√		√			
PRC-005-1	All	Transmission and Generation Protection System Maintenance and Testing	DP*, GO, TO	Document/implement transmission protection system maintenance/testing/monitoring PROGRAM			√					
PRC-008-0	All	Implementation and Documentation of Underfrequency Load Shedding Equipment Maintenance Program	DP, TO	Document/implement UFLS maintenance/testing PROGRAM			√					
PRC-010-0	All	Technical Assessment of the Design and Effectiveness of Undervoltage Load Shedding Program.	DP, LSE, TO, TOP	ASSESS design and effectiveness of UVLS programs			√					
PRC-011-0	All	UVLS System Maintenance and Testing	DP, TO	Document/implement UVLS maintenance/testing PROGRAM			√					
PRC-016-0	All	Special Protection System Misoperations	DP, GO, TO	DOCUMENT/analyze misoperations			√		√			
PRC-017-0	All	Special Protection System Maintenance and Testing	DP, GO, TO	Document/implement SPS maintenance/testing PROGRAM			√					
PRC-021-1	All	Under-Voltage Load Shedding Program Data	DP, TO	DOCUMENTATION of undervoltage load shedding program			√					
TOP-003-0	All	Planned Outage Coordination	BA, GOP, RC, TOP	Scheduled generator and transmission outages that may affect the reliability of interconnected operations must be planned and coordinated among Balancing Authorities, Transmission Operators, and Reliability Coordinators.			√				√	
TOP-004-1	R6	Transmission Operations	TOP	To ensure that the transmission system is operated so that instability, uncontrolled separation, or cascading outages will not occur as a result of the most severe single Contingency and specified multiple Contingencies.			√					
TOP-005-1	All	Operational Reliability Information	BA, PSE, RC, TOP	To ensure reliability entities have the operating data needed to monitor system conditions within their areas.			√				√	



Attachment C: Three-year BA, TOP, RC Compliance Audit Schedule

Note: All functions in which the entity is registered will be reviewed.

MRO List of BA, TOP, and RC Functional Entities:

<u>Entity:</u>	<u>Type:</u>
ALTE	BA
ALTW	BA, TOP
ATC	TOP
CBPC	TOP
DPC	BA, TOP
GRE	BA, TOP
LES	BA, TOP
MEC	BA, TOP
MGE	BA, TOP
MH	BA, TOP
MISO - RC(2)	RC
MP	BA, TOP
MPC	TOP
MPW	BA, TOP
NPPD	BA, TOP
OPPD	BA, TOP
OTP	BA, TOP
RPU	TOP
SMP	BA, TOP
SPC	BA, TOP, RC
TSGT	TOP
UPPC	BA
WAPA	BA, TOP
WPS	BA
Xcel (NSP)	BA, TOP

<u>2007</u>	<u>Audit Date</u>	<u>2008</u>	<u>2009</u>
MPW	April 11-12	DPC	GRE
OPPD	April 25-26	LES	MH
OTP	May 2-3	CBPC	MP
MGE	July 25-26	MEC	SMP
WAPA	August 21-23	SPC	MPC
RPU	September 6-7	TSGT	WPS & UPPC
NPPD	November 14-15	Xcel (NSP)	MISO-STP
ATC	December 4-5		
ALT	December 12-13		

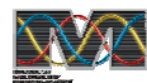
Attachment C: Six-year (non BA, TOP, RC) Compliance Audit Schedule (tentative schedule). 2007 is the first year of the six-year cycle. Therefore, the first six-year cycle will be completed in 2012.

MRO List of "Other" Functional Entities:

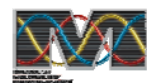
Entity 2008:	Entity 2009:	Entity 2010:	Entity 2011:	Entity 2012:
FPL Energy Duane Arnold, LLC	Minnesota Municipal Power Agency (MMPA)	City of Ames Electric Services	White Pine Electric Power, LLC	Sempra Energy Trading Corp.
St. Paul Cogeneration LLC	Watertown Municipal Utilities Department	GEN-SYS Energy	Badger Windpower, LLC	The Energy Authority Inc.
Trimont Wind I, LLC	Wisconsin Public Power Inc. and Sub-registry	PPL EnergyPlus, LLC	BP Energy Company	Highline Electric Association
Missouri Basin Municipal Power	Marshall Municipal Utilities	Detroit Lakes Public Utilities	Fortis Energy Marketing & Trading	City of Grand Island, NE
Central Minnesota Municipal Power Agency (CMMPA)	Municipal Energy Agency of Nebraska	Moorhead Public Service	Marshfield Utilities	LSP - Cottage Grove, LP
Wheat Belt Public Power District	FPL Energy Midwest Wind	Central Iowa Power Cooperative (CIPCO)	Alexandria Light & Power	EPCOR Energy Marketing (US) Inc.
Midwest Contingency Reserve Sharing Group	Mid-Continent Area Power Pool (MAPP)	Constellation Energy Commodities Group Inc.	ConocoPhillips Company	Wisconsin Rapids Water Works & Lighting Commission
Cedar Falls Utilities	Pierre Municipal Utilities	Midwest Electric Cooperative Corporation	City of Elkhorn Electric Department	Tenaska Power Services Co.
Lighthouse Energy Trading Co., Inc.	Board of Waterworks & Electric Power Plant Trustees - Atlantic, Iowa	DC Energy Midwest, LLC	Covanta Hennepin Energy Resource Co., LP	Hutchinson Utilities Commission
Roquette American	Corp of Engineers	Basin Electric Power Cooperative	Willmar Municipal Utilities	Escanaba Municipal Electric Utility
Badger Power Marketing Authority	Occidental Power Services, Inc.	Dominion Energy Kewaunee, Inc.	DC Energy Mid-Atlantic, LLC	St. Leon Wind Energy LP
Lake Benton Power Partners II, LLC	Calpine Corporation	Panhandle Rural Electric Membership Association, Inc.	Edison Mission Marketing & Trading, Inc.	Heartland Consumers Power District
DC Energy, LLC	Northern Iowa Wind Power 1, LLC	Cargill Power Markets, LLC	TransAlta Energy Marketing (U.S) Inc.	Montana-Dakota Utilities Company
Hastings Utilities	J. Aron & Company	Dominion Energy Marketing, Inc.	NorthWestern Energy	LSP - Cottage Grove, Inc.
Calpine Energy Services	Adams Columbia Electric Cooperative	Jo Carroll Energy	Manitowoc Public Utilities	

Attachment D - MRO 2007 Self-Certification Compliance Schedule, and Periodic Data Submittal and Reporting

Registered Entities shall report violations to MRO when detected MRO shall report violations to NERC within two days after verification and review of alleged violation	On-going
Self-Certification notification sent to all Registered Entities in MRO footprint	September
Self-Certification forms due to MRO from Registered Entities via CDMS Note: MRO will provide at least 30-days between notification and required submittal date	November
Signature Page submitted by all Registered Entities in MRO corporate footprint	Must be sent by Registered Entity on date in which final Self-Certification form is submitted
Mitigation Plan due to MRO via CMDS (resulting from Self-Certification) Note: Mitigation Plan required to be submitted by Registered Entity within 30-days after being served the notice of alleged violation from MRO	December
Spot-Check request sent by MRO to Compliance Contacts	November
Registered Entities submit Spot-Check documentation to MRO Note: MRO will provide at least 20-days between spot-check requests and required submittal date	November / December
End of 2007 Compliance Program	December 31, 2007



2007 MRO Preliminary Periodic Data Submittal and Reporting					
Abbr	Full Name	Frequency	Due Date	NERC / MRO Standard	Comments
CPS	Control Performance Standard	Monthly	By the 10th of the month for previous month	BAL-001-0 All Requirements	Monthly Data Request
DCS	Disturbance Control Performance	Monthly	By the 10th of the month for previous month	BAL-002-0 All Requirements	Midwest Reserve Sharing Group based upon actual event
MBAL	Operating Reserve Spinning Requirement	Monthly	By the 10th of the month for previous month	MBAL-002-0 All Requirements	Monthly Data Request
CERT	Certification of Operating Personnel	Monthly	By the 10th of the month for previous month	PER-003-0 All Requirements	Monthly Data Request
FAC	Vegetation Management	Monthly	By the 10th of the month for previous month	FAC-003-1 All Requirements	Monthly Data Request
N/A	Special Protection System Misoperations	Quarterly	By the 10th of the month following the quarter	PRC-016-0 Requirements All	Quarterly Data Request
N/A	2008 Series MRO Models	Annual	TBD	MOD-010-0, MOD-012-0, PRC-006-0, PRC-007-0, PRC-021-0 All requirements	Model Submittal TBD
N/A	All other Standards identified for event or exception reporting	Per event and / or exception	As identified in Standard and 48-Hour Reporting	All other Standards identified for event or exception reporting	On-going Reporting Requirements



Attachment E – CIP Implementation Plan

For 2007, compliance assessment with CIP-002-1 through CIP-009-1 includes validating the Responsible Entity’s status of BW (Begin Work), SC (Substantially Compliant), C (Compliant), and AC (Auditably Compliant), per the implementation tables below. A special survey / questionnaire have been developed.

“Begin Work” means a Responsible Entity has developed and approved a plan to address the requirements of a standard, has begun to identify and plan for necessary resources, and has begun implementing the requirements.

“Substantially Compliant” means an entity is well along in its implementation to becoming compliant with a requirement, but is not yet fully compliant.

“Compliant” means the entity meets the full intent of the requirements and is beginning to maintain required “data, documents, documentation, logs, and records”.

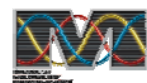
“Auditably Compliant” means the entity meets the full intent of the requirement and can demonstrate compliance to an auditor, including 12-calendar-months of auditable “data, documents, documentation, logs, and records”. Per the standards, each subsequent compliance-monitoring period will require the previous full calendar year of such material.

In 2007, Responsible Entities shall self-certify the status in terms of progress (BW, SC, C, or AC) in meeting the requirements found in CIP-002-1 through CIP-009-1 per the tables below. In 2007, compliance assessment and violation determination, as well as sanction and penalty will not occur for the CIP-002-1 through CIP-009-1 standards.

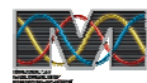
**Table 1
Compliance Schedule for Standards CIP-002-1 through CIP-009-1**

Table 1 defines the implementation schedule for Balancing Authorities (BA), Transmission Operators (TOP), and Reliability Coordinators (RC) that were required to self-certify compliance to the NERC Urgent Action Cyber Security Standard 1200 (UA 1200).

Requirement	End of 2nd Qtr 2007		End of 2nd Qtr 2008		End of 2nd Qtr 2009		End of 2nd Qtr 2010	
	System Control Center	Other Facilities	System Control Center	Other Facilities	System Control Center	Other Facilities	System Control Center	Other Facilities
Standard CIP-002-1 — Critical Cyber Assets								
R1	SC	BW	C	SC	AC	C	AC	AC



R2	SC	BW	C	SC	AC	C	AC	AC
R3	SC	BW	C	SC	AC	C	AC	AC
R4	BW	BW	SC	SC	C	C	AC	AC
Standard CIP-003-1 — Security Management Controls								
R1	SC	BW	C	SC	AC	AC	AC	AC
R2	SC	SC	C	C	AC	AC	AC	AC
R3	SC	BW	C	SC	AC	C	AC	AC
R4	BW	BW	SC	SC	C	C	AC	AC
R5	BW	BW	SC	SC	C	C	AC	AC
R6	BW	BW	SC	SC	C	C	AC	AC
Standard CIP-004-1 — Personnel & Training								
R1	BW	BW	SC	SC	C	C	AC	AC
R2	SC	BW	C	SC	AC	C	AC	AC
R3	SC	BW	C	SC	AC	C	AC	AC
R4	SC	BW	C	SC	AC	C	AC	AC
Standard CIP-005-1 — Electronic Security								
R1	BW	BW	SC	SC	C	C	AC	AC
R2	BW	BW	SC	SC	C	C	AC	AC
R3	BW	BW	SC	SC	C	C	AC	AC
R4	BW	BW	SC	SC	C	C	AC	AC
R5	BW	BW	SC	SC	C	C	AC	AC
Standard CIP-006-1 — Physical Security								
R1	BW	BW	SC	SC	C	C	AC	AC
R2	BW	BW	SC	SC	C	C	AC	AC
R3	BW	BW	SC	SC	C	C	AC	AC
R4	BW	BW	SC	SC	C	C	AC	AC
R5	BW	BW	SC	SC	C	C	AC	AC
R6	BW	BW	SC	SC	C	C	AC	AC

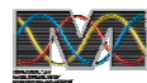


Standard CIP-007-1 — Systems Security Management								
R1	SC	BW	C	SC	AC	C	AC	AC
R2	BW	BW	SC	SC	C	C	AC	AC
R3	BW	BW	SC	SC	C	C	AC	AC
R4	BW	BW	SC	SC	C	C	AC	AC
R5	BW	BW	SC	SC	C	C	AC	AC
R6	BW	BW	SC	SC	C	C	AC	AC
R7	BW	BW	SC	SC	C	C	AC	AC
R8	BW	BW	SC	SC	C	C	AC	AC
R9	BW	BW	SC	SC	C	C	AC	AC
Standard CIP-008-1 — Incident Reporting and Response Planning								
R1	SC	BW	C	SC	AC	C	AC	AC
R2	BW	BW	SC	SC	C	C	AC	AC
Standard CIP-009-1 — Recovery Plans								
R1	SC	BW	C	SC	AC	C	AC	AC
R2	SC	BW	C	SC	AC	C	AC	AC
R3	BW	BW	SC	SC	C	C	AC	AC
R4	BW	BW	SC	SC	C	C	AC	AC
R5	BW	BW	SC	SC	C	C	AC	AC

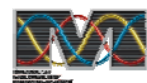
Table 2
Compliance Schedule for Standards CIP-002-1 through CIP-009-1

Table 2 defines the implementation schedule for Transmission Service Providers (TSP), those Transmission Operators (TOP) and Balancing Authorities (BA) that were not required to Self-certify compliance to UA 1200, NERC, and Regional Reliability Organizations.

	End of 2nd Qtr 2007	End of 2nd Qtr 2008	End of 2nd Qtr 2009	End of 2nd Qtr 2010
Requirement	All Facilities	All Facilities	All Facilities	All Facilities
Standard CIP-002-1 — Critical Cyber Assets				
R1	BW	SC	C	AC
R2	BW	SC	C	AC
R3	BW	SC	C	AC
R4	BW	SC	C	AC
Standard CIP-003-1 — Security Management Controls				



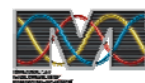
R1	BW	SC	C	AC
R2	SC	C	AC	AC
R3	BW	SC	C	AC
R4	BW	SC	C	AC
R5	BW	SC	C	AC
R6	BW	SC	C	AC
Standard CIP-004-1 — Personnel & Training				
R1	BW	SC	C	AC
R2	BW	SC	C	AC
R3	BW	SC	C	AC
R4	BW	SC	C	AC
Standard CIP-005-1 — Electronic Security				
R1	BW	SC	C	AC
R2	BW	SC	C	AC
R3	BW	SC	C	AC
R4	BW	SC	C	AC
R5	BW	SC	C	AC
Standard CIP-006-1 — Physical Security				
R1	BW	SC	C	AC
R2	BW	SC	C	AC
R3	BW	SC	C	AC
R4	BW	SC	C	AC
R5	BW	SC	C	AC
R6	BW	SC	C	AC
Standard CIP-007-1 — Systems Security Management				
R1	BW	SC	C	AC
R2	BW	SC	C	AC
R3	BW	SC	C	AC
R4	BW	SC	C	AC
R5	BW	SC	C	AC
R6	BW	SC	C	AC
R7	BW	SC	C	AC
R8	BW	SC	C	AC
R9	BW	SC	C	AC
Standard CIP-008-1 — Incident Reporting and Response Planning				
R1	BW	SC	C	AC
R2	BW	SC	C	AC
Standard CIP-009-1 — Recovery Plans				
R1	BW	SC	C	AC
R2	BW	SC	C	AC
R3	BW	SC	C	AC
R4	BW	SC	C	AC
R5	BW	SC	C	AC



**Table 3
Compliance Schedule for Standards CIP-002-1 through CIP-009-1**

Table 3 defines the implementation schedule for Responsible Entities required to register during 2006. Interchange Authorities, Transmission Owners, Generator Owners, Generator Operators, and Load-Serving Entities.

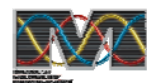
	December 31, 2006	December 31, 2008	December 31, 2009	December 31, 2010
Requirement	All Facilities	All Facilities	All Facilities	All Facilities
Standard CIP-002-1 — Critical Cyber Assets				
R1	BW	SC	C	AC
R2	BW	SC	C	AC
R3	BW	SC	C	AC
R4	BW	SC	C	AC
Standard CIP-003-1 — Security Management Controls				
R1	BW	SC	C	AC
R2	SC	C	AC	AC
R3	BW	SC	C	AC
R4	BW	SC	C	AC
R5	BW	SC	C	AC
R6	BW	SC	C	AC
Standard CIP-004-1 — Personnel & Training				
R1	BW	SC	C	AC
R2	BW	SC	C	AC
R3	BW	SC	C	AC
R4	BW	SC	C	AC
Standard CIP-005-1 — Electronic Security				



R1	BW	SC	C	AC
R2	BW	SC	C	AC
R3	BW	SC	C	AC
R4	BW	SC	C	AC
R5	BW	SC	C	AC

Table 3 (cont.)

	December 31, 2006	December 31, 2008	December 31, 2009	December 31, 2010
Requirement	All Facilities	All Facilities	All Facilities	All Facilities
Standard CIP-006-1 — Physical Security				
R1	BW	SC	C	AC
R2	BW	SC	C	AC
R3	BW	SC	C	AC
R4	BW	SC	C	AC
R5	BW	SC	C	AC
R6	BW	SC	C	AC
Standard CIP-007-1 — Systems Security Management				
R1	BW	SC	C	AC
R2	BW	SC	C	AC
R3	BW	SC	C	AC
R4	BW	SC	C	AC
R5	BW	SC	C	AC
R6	BW	SC	C	AC
R7	BW	SC	C	AC
R8	BW	SC	C	AC
R9	BW	SC	C	AC
Standard CIP-008-1 — Incident Reporting and Response Planning				
R1	BW	SC	C	AC
R2	BW	SC	C	AC



Standard CIP-009-1 — Recovery Plans				
R1	BW	SC	C	AC
R2	BW	SC	C	AC
R3	BW	SC	C	AC
R4	BW	SC	C	AC

Table 3 (CIP-009-1 cont.)

	December 31, 2006	December 31, 2008	December 31, 2009	December 31, 2010
Requirement	All Facilities	All Facilities	All Facilities	All Facilities
R5	BW	SC	C	AC

**Table 4
Compliance Schedule for Standards CIP-002-1 through CIP-009-1**

Table 4 defines the implementation scheduled for Responsible Entities registering to a Functional Model function in 2007 and Thereafter.

	Upon Registration	Registration + 12 months	Registration + 24 months	Registration + 36 months
Requirement	All Facilities	All Facilities	All Facilities	All Facilities

Standard CIP-002-1 — Critical Cyber Assets

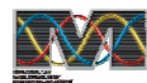
R1	BW	SC	C	AC
R2	BW	SC	C	AC
R3	BW	SC	C	AC
R4	BW	SC	C	AC

Standard CIP-003-1 — Security Management Controls

R1	BW	SC	C	AC
R2	SC	C	AC	AC
R3	BW	SC	C	AC
R4	BW	SC	C	AC
R5	BW	SC	C	AC
R6	BW	SC	C	AC

Standard CIP-004-1 — Personnel & Training

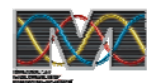
R1	BW	SC	C	AC
R2	BW	SC	C	AC



R3	BW	SC	C	AC
R4	BW	SC	C	AC

Table 4 (cont.)

Requirement	Upon Registration All Facilities	Registration + 12 months All Facilities	Registration + 24 months All Facilities	Registration + 36 months All Facilities
Standard CIP-005-1 — Electronic Security				
R1	BW	SC	C	AC
R2	BW	SC	C	AC
R3	BW	SC	C	AC
R4	BW	SC	C	AC
R5	BW	SC	C	AC
Standard CIP-006-1 — Physical Security				
R1	BW	SC	C	AC
R2	BW	SC	C	AC
R3	BW	SC	C	AC
R4	BW	SC	C	AC
R5	BW	SC	C	AC
R6	BW	SC	C	AC
Standard CIP-007-1 — Systems Security Management				
R1	BW	SC	C	AC
R2	BW	SC	C	AC
R3	BW	SC	C	AC
R4	BW	SC	C	AC
R5	BW	SC	C	AC
R6	BW	SC	C	AC
R7	BW	SC	C	AC
R8	BW	SC	C	AC
R9	BW	SC	C	AC
Standard CIP-008-1 — Incident Reporting and Response Planning				
R1	BW	SC	C	AC
R2	BW	SC	C	AC
Standard CIP-009-1 — Recovery Plans				
R1	BW	SC	C	AC
R2	BW	SC	C	AC
R3	BW	SC	C	AC
R4	BW	SC	C	AC
R5	BW	SC	C	AC



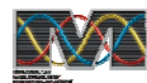
Attachment F – Special 48-Hour Reporting

Regional Entities shall report to NERC, on a confidential basis, any Alleged Violations of Reliability Standards regardless of significance, whether verified or still under investigation, within five (5) business days, unless the violation has resulted in or has the potential to result in, a reduced level of reliability to the bulk power system (as provided in Section 408 of the NERC Rules of Procedure), in which cases the Regional Entity shall notify NERC within forty-eight (48) hours.

NERC shall notify FERC or any Applicable Governmental Authority within two (2) business days of receiving notice from the Regional Entity. Such reports shall include information regarding the nature of the Alleged Violation and its potential impact on the reliability of the bulk power system, the name of the Registered Entity involved, the status and timetable of any compliance violation assessment, and the name of a Regional Entity staff person knowledgeable about the violation or Alleged Violation to serve as a point of contact.

In 2007, the following reliability standards and specific requirements have been identified for 48-hour reporting:

- COM-002-2 — Communications and Coordination
- EOP-004-1 — Disturbance Reporting
- FAC-003-1 – R3.4.1 and R3.4.2 — Vegetation Management Program
- IRO-001-1 — Reliability Coordination – Responsibilities and Authorities –for R8 and R9 only, the rest are administrative
- IRO-002-1 — R4-R9 - Reliability Coordination – Facilities
- IRO-003-2 — Reliability Coordination – Wide Area View
- IRO-004-1 — Reliability Coordination – Operations Planning
- IRO-005-1 — Reliability Coordination – Current Day Operations
- IRO-006-3 — Reliability Coordination –Transmission Loading Relief
- IRO-015-1 — Notifications and Information Exchange Between Reliability Coordinators
- IRO-016-1 — Coordination of Real-time Activities Between Reliability Coordinators
- PER-004-1 — Reliability Coordinator Staffing
- TOP-001-1 — Reliability Responsibilities and Authorities
- TOP-003-0 — Planned Outage Coordination
- TOP-004-1 — Transmission Operations –for R4 only
- TOP-005-1 — Operational Reliability Information (website needs to be updated. Not all approved standards are in the PDF of the complete list)



- TOP-006-1 — Monitoring System Conditions
- TOP-007-0 — Reporting SOL and IROL Violations
- TOP-008-1 — Response to Transmission Limit Violations
- VAR-001-1 — Voltage and Reactive Control
- Regional standards, as designated by each region

