



Midwest Reliability Organization (MRO)

2008 Regional Compliance Monitoring and Enforcement Implementation Plan

Reviewed by MRO Compliance Committee: October 31, 2007

Submitted to NERC: November 1, 2007

Approved by NERC: December 4, 2007

Table of Contents

1. Introduction -----	3
2. MRO Regional Responsibilities -----	4
3. 2008 MRO Compliance Monitoring and Enforcement Program Implementation -----	5
A. Registration and Certification -----	6
B. Compliance Audits-----	7
C. Periodic Data Submittals -----	7
D. Investigations -----	8
E. Self Certification-----	8
F. Spot (Random) Check-----	9
G. Reporting -----	10
H. Enforcement and Mitigation-----	12
4. MRO Compliance Program Supporting Documentation-----	14
A. Methods of Measurement -----	14
B. Communication Plan/Supporting Documentation-----	14
5. References-----	14
Attachment A – 2008 Actively Monitored Standards -----	15
Attachment B – CIP Implementation Plan -----	21
Attachment C – Compliance Audit Schedules-----	31
Attachment D – MRO 2008 Self-Certification Compliance Schedule, and Periodic Data Submittal and Reporting -----	33
Attachment E – Special 48-Hour Reporting-----	36
Attachment F – MRO Compliance and Enforcement Process Maps -----	38



1. Introduction

The Midwest Reliability Organization (MRO) Compliance Monitoring and Enforcement Program Implementation Plan (Implementation Plan) is a description of the annual compliance monitoring and enforcement activities to ensure MRO, as a Cross Border Regional Entity, fulfills its responsibilities under the NERC Delegation Agreement and other applicable obligations. The compliance monitoring and enforcement activities are carried out by the MRO staff. This plan outlines the implementation of the MRO Compliance Monitoring and Enforcement Program (CMEP).

The objective of the Implementation Plan is to:

- Promote the reliability of the bulk power system through rigorous compliance monitoring and enforcement activities,
- Facilitate uniformity of compliance activities throughout the MRO footprint, and
- Improve the compliance program by analyzing compliance monitoring experience across the MRO footprint and implementing necessary improvements.

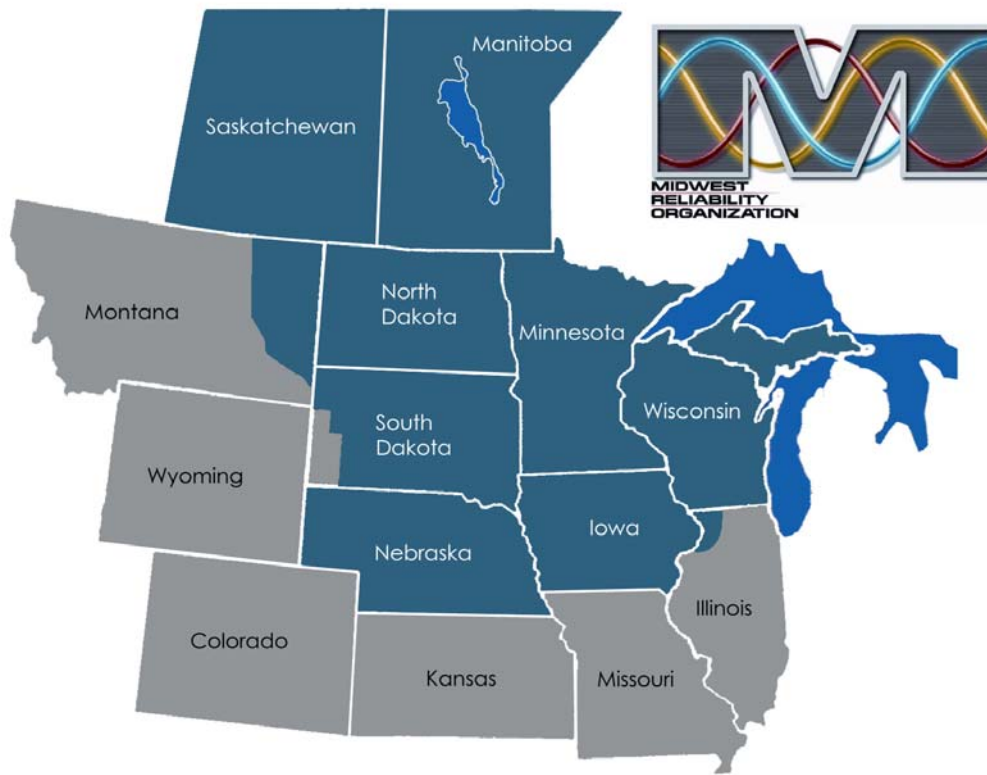
The Regional Implementation Plan and other MRO relevant Compliance Program documents are posted on the MRO web site at:

<http://www.midwestreliability.org/CDMS.html>.

In the first quarter of 2008, MRO will develop its 2009 implementation plan to more effectively align with the budget development and approval cycle.



2. MRO Regional Responsibilities



MRO Footprint

In the United States, NERC has delegated its compliance and enforcement authority to Regional Entities. The MRO is the Regional Entity assigned to monitor, assess, and enforce compliance of Registered Entities located within the MRO corporate footprint in accordance with the approved delegation agreement. In addition, the MRO will have similar agreements with Saskatchewan and Manitoba. In 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, registration, 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.



3. 2008 MRO Compliance Monitoring and Enforcement Program Implementation

The MRO Compliance Monitoring and Enforcement Program implementation plan is organized into the following eight processes:

- **Registration and Certification**
- **Compliance Audits**
- **Periodic Data Submittals**
- **Investigations**
- **Self-certification**
- **Spot (Random) Checks**
- **Reporting**
- **Enforcement and Mitigation**

NERC has designated a subset of Reliability Standards for active compliance monitoring and reporting by the entities in their 2008 Implementation Plan. MRO assumes that NERC has performed an assessment to determine the Reliability Standards to be “actively monitored”. For these Standards, active monitoring means that Registered Entities within the MRO region are required to report compliance data or results to the MRO even if they are fully compliant.

Attachment A contains the list of “actively monitored” Standards identified for the 2008 Compliance Program. In 2008, a total of **64** NERC Standards have been identified to be actively monitored in the annual program which includes a total of **303** requirements. In addition, the MRO has identified **1** MRO Standard (MRO-MBAL-002) which includes a total of **2** requirements as actively monitored (as of January 2007).

The **8** NERC CIP-002-1 through CIP-009-1 Standards which include 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 B** of this document. In 2008, 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 CIP survey/questionnaire is accessed and submitted via CDMS. All Registered Entities listed in the MRO Registry must complete the survey by a date yet to be determined.

The MRO will serve as the single point of contact for Registered Entities and coordinate as needed with NERC and the regulatory authorities.

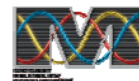
The designated Primary Compliance Contact shall serve as the single point of contact between the MRO and the Registered Entity.

A. Registration and Certification

The entities responsible for compliance with Reliability Standards are referred to as "Registered Entities." Registered Entities are owners, operators, and/or 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.

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. 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 and as specified in the NERC Implementation Plan.

Organizational Registration and Certification requirements and processes are provided by NERC and the MRO will carry out those responsibilities. In 2008, the MRO will lead the Reliability Coordinator certification for Saskatchewan Power Corporation and participate in a joint Balancing Authority certification for the Midwest ISO.



B. Compliance Audits

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

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. MRO staff shall perform comprehensive compliance audits to determine compliance with the CMEP. Each MRO Audit Team member will have completed NERC training applicable to the compliance audit.

The audit schedule for Registered Entities on the three-year cycle was determined prior to 2008 and will continue. The MRO will perform six (6) of these audits in 2008. The audit schedule for Registered Entities on the six-year cycle was determined by assigning a random number (or identifier) to each entity and then performing a lottery (or electronic random selection) to create the six-year audit schedule. The MRO will perform fourteen (14) of these audits in 2008. Registered Entities scheduled for compliance audits in 2008 will be assessed for compliance with all applicable requirements in the 2008 program for which the entity is responsible. **Attachment C** includes a schedule of all compliance audits and the identity of the entity scheduled for audit.

C. Periodic Data Submittals

Periodic submittals consist of monthly, quarterly, and annual data submittals. These submittals are monitored for timeliness and quality.



The MRO will require Periodic Data Submittals in accordance with the established schedule or on an ad hoc basis. This submittal may include data to support modeling, studies, analysis, 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 inform the Registered Entities of changes and/or updates.

D. Investigations

Investigations are used to confirm or deny all alleged or probable violations identified by NERC, MRO, or other parties. 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.

MRO staff will investigate and determine if the alleged violation is valid. 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.

E. Self Certification

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 2008 program. Registered Entities participating in a compliance audit during the 2008 program year will not participate in the annual self-certification process.



The self-certification process is performed 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. 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 detailed self-certification guideline document is posted on the MRO compliance program web site.

Attachment D contains a compliance schedule for self-certification and periodic data submittal.

F. Spot (Random) Check

Spot checking shall be conducted by MRO staff at any time to verify or confirm self-certification and periodic data submittal.

Spot Checks may be initiated at any time in response to events or operating problems as described in a Reliability Standard, system events, or complaints from within or outside of the MRO area of responsibility. The strategy for spot check is designed to improve reliability by demonstrating compliance with Standards and placing all registered entities “on notice” that every applicable Standard is “at risk” for being audited at any time during the audit year.

MRO may randomly select functions, registered entities, and Standards and/or particular requirements of Standards to conduct a spot check as described below.



- i. For a registered entity random selection, all or a subset of the applicable Standards will be audited.
- ii. For a function, all or a subset of the applicable Standards of that function.
- iii. For the Standard or requirements, all or a subset of registered entities will be audited for that Standard or requirement.

In addition, spot-checks are conducted annually 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.

G. 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 other internal review process. The MRO staff will review the information and determine formal findings of non-compliance.

The MRO encourages Registered Entities to self-report each violation of a requirement or multiple requirements of the same Reliability Standard at the time the Registered Entity becomes aware of the violation. Self-reporting will be considered a mitigating factor when the MRO determines the appropriate sanction or penalty.

The MRO 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 (**Attachment E**).

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 possible violations to the extent required by any Reliability Standards. 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.

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, (3) if the complainant wishes to remain anonymous, or (4) the complainant specifically requests NERC to conduct the review of the complaint.

Data Collection and Retention

The Compliance Data Management System (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 MRO CMEP Manual.



H. Enforcement and Mitigation

The MRO shall determine (i) whether there have been alleged violations of Reliability Standards by Registered Entities within the MRO area of responsibility, and (ii) if so, the appropriate remedial actions, penalties, and sanctions to impose as prescribed in the NERC Sanction Guidelines.

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

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

- the Reliability Standard and provision thereof which the Registered Entity has violated,
- the date and time the alleged violation occurred (or is occurring),
- a summary of the facts as determined by the MRO demonstrating or constituting the alleged violation, and
- the proposed penalty or sanction, if any, determined by the MRO to be applicable to the alleged 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 will also issue an initial notice of alleged violation, without specifying the proposed penalty or sanction, to the Registered Entity. A Registered Entity found to allegedly be in violation of a Reliability Standard shall file with the MRO (i) a proposed Mitigation Plan to correct the violation, (ii) any request for extension to an existing mitigation plan, (iii) and a report of a completed mitigation. Specific timing requirements



for mitigation plan submittal can be found in the MRO CMEP Manual. Mitigation Plans are accessed and submitted via CDMS.

Hearing Process

The MRO Hearing Process (**Attachment F**) 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 support as needed. Any settlement must be approved by the Board.

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

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.



4. 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. A list of the FERC Approved Reliability Standards is also posted on the MRO compliance program web page at: <http://www.midwestreliability.org/CDMS.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 (linked to the NERC website)
- Standard / Requirement / Functional entity matrix (linked to the NERC website)
- Registered Entity Compliance Contact Information
- Calendar of Events and Pertinent Dates
- Archived Compliance Program Information

5. References

- NERC web site (<http://www.nerc.com>)
- MRO Compliance Website
(<http://www.midwestreliability.org/CDMS.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 – 2008 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.

MRO - 2008 CMEP Matrix NERC and MRO Reliability Standards										
	Std #	Requirements	Standard	Who	Purpose	Audit	Self-Certification	Monthly/Quarterly Reporting	Exception Reporting	Investigation
1	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		
2	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		
3	BAL-003-0	All	Frequency Response and Bias	BA	This standard provides a consistent method for calculating the Frequency Bias component of ACE.	√			√	
4	BAL-004-0	All	Time Error Correction	RC and BA	The purpose of this standard is to ensure that Time Error Corrections are conducted in a manner that does not adversely affect the reliability of the Interconnection.	√				
5	BAL-005-0	All	Automatic Generation Control	BA, GOP, TOP and LSE	This standard establishes requirements for Balancing Authority Automatic Generation Control (AGC) necessary to calculate Area Control Error (ACE) and to routinely deploy the Regulating Reserve. The standard also ensures that all facilities and load electrically synchronized to the Interconnection are included within the metered boundary of a Balancing Area so that balancing of resources and demand can be achieved.	√				
6	BAL-006-1	All	Inadvertent Interchange	BA	This standard defines a process for monitoring Balancing Authorities to ensure that, over the long term, Balancing Authority Areas do not excessively depend on other Balancing Authority Area so that balancing of resources and demand can be achieved.	√		M	√	
7	MRO- MBAL-002	All	Operating Reserves - Spinning (MRO)	BA and RC	Regional Reliability Standard to address the Operating Reserve (spinning) requirements within the MRO.	√		M	√	
8	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.	√	√			
9	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		Special Survey			

Program Section 5.2 –2008 Midwest Reliability Organization Implementation Plan

10	COM-001-1	R2 and R5	Telecommunications	TOP, 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.	√	√				
11	COM-002-2	All	Communications and Coordination	RC, BA, TOP and GOP	To ensure Balancing Authorities, Transmission Operators, and Generator Operators have adequate communications and that these communications capabilities are staffed and available for addressing a real-time emergency condition. To ensure communications by operating personnel are effective.	√	√				
12	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.	√	√				
13	EOP-002-2	All	Capacity and Energy Emergencies	RC and BA	To ensure Reliability Coordinators and Balancing Authorities are prepared for capacity and energy emergencies.	√	√				√
14	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.	√	√				
15	EOP-004-1	All	Disturbance Reporting	RC, BA, TOP, GOP, LSE and RRO	Disturbances or unusual occurrences that jeopardize the operation of the Bulk Electric System, or result in system equipment damage or customer interruptions, need to be studied and understood to minimize the likelihood of similar events in the future.	√	√				√
16	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	√	√				
17	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.	√	√				
18	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.	√	√				
19	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.	√	√				
20	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.	√	√			M	



Program Section 5.2 –2008 Midwest Reliability Organization Implementation Plan

21	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.	√	√				
22	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.	√	√				
23	FAC-013-1	All	Establish and Communicate Transfer Capabilities	RC and PA	To ensure that Transfer Capabilities used in the reliable planning and operation of the Bulk Electric System (BES) are determined based on an established methodology or methodologies.	√	√				
24	INT-001-2	All	Interchange Information	BA and PSE	To ensure that Interchange information is submitted to the NERC-identified reliability analysis service.	√	√				√
25	INT-003-2	All	Interchange Transaction Implementation	BA	To ensure Balancing Authorities confirm Interchange Schedules with Adjacent Balancing Authorities prior to implementing the schedules in their Area Control Error (ACE) equations.	√	√				√
26	INT-004-1	All	Dynamic Interchange Transaction Modifications	RC, BA, TOP and PSE	To ensure Dynamic Transfers are adequately tagged to be able to determine their reliability impacts.	√					
27	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.	√	√				
28	IRO-003-2	All	Reliability Coordination – Wide-Area View	RC	The Reliability Coordinator must have a wide-area view of its own Reliability Coordinator Area and that of neighboring Reliability Coordinators.	√	√				√
29	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.	√	√				√
30	IRO-005-1	All	Reliability Coordination – Current Day Operations	RC, BA, TOP, TSP, GOP, LSE AND PSE	The Reliability Coordinator must be continuously aware of conditions within its Reliability Coordinator Area and include this information in its reliability assessments. The Reliability Coordinator must monitor Bulk Electric System parameters that may have significant impacts upon the Reliability Coordinator Area and neighboring Reliability Coordinator Areas.	√					



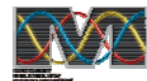
Program Section 5.2 –2008 Midwest Reliability Organization Implementation Plan

31	IRO-006-3	All	Reliability Coordination – Transmission Loading Relief	RC, TOP and BA	Regardless of the process it uses, the Reliability Coordinator must direct its Balancing Authorities and Transmission Operators to return the transmission system to within its Interconnection Reliability Operating Limits as soon as possible, but no longer than 30 minutes. The Reliability Coordinator needs to direct Balancing Authorities and Transmission Operators to execute actions such as reconfiguration, redispatch, or load shedding until relief requested by the TLR process is achieved.	√					√
32	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.	√	√				
33	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.	√	√				
34	IRO-016-1	All	Coordination of Real-time Activities 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.	√	√				
36	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.	√	√				
37	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.	√		M			
38	PER-004-1	All	Reliability Coordination — Staffing	RC	Reliability Coordinators must have sufficient, competent staff to perform the Reliability Coordinator functions.		√				
39	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.	√	√				
40	PRC-005-1	All	Transmission and Generation Protection System Maintenance and Testing	DP*, GO, TO	Document/implement transmission protection system maintenance/testing/monitoring PROGRAM	√	√				



Program Section 5.2 –2008 Midwest Reliability Organization Implementation Plan

41	PRC-008-0	All	Implementation and Documentation of Underfrequency Load Shedding Equipment Maintenance Program	DP, TO	Document/implement UFLS maintenance/testing PROGRAM	√	√			
42	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	√	√			
43	PRC-011-0	All	UVLS System Maintenance and Testing	DP, TO	Document/implement UVLS maintenance/testing PROGRAM	√	√			
44	PRC-016-0	All	Special Protection System Misoperations	DP, GO, TO	DOCUMENT/analyze misoperations	√	√			
45	PRC-017-0	All	Special Protection System Maintenance and Testing	DP, GO, TO	Document/implement SPS maintenance/testing PROGRAM	√	√			
46	PRC-021-1	All	Under-Voltage Load Shedding Program Data	DP, TO	DOCUMENTATION of undervoltage load shedding program	√	√			
47	TOP-002-2	All	Normal Operations Planning	BA, TOP, GOP, LSE and TSP	Current operations plans and procedures are essential to being prepared for reliable operations, including response for unplanned events.	√	√			√
48	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.	√	√			√
49	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.	√	√			√
50	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.	√	√			√
51	TOP-007-0	All	Reporting System Operating Limit (SOL) and Interconnection Reliability	RC, TOP	Ensure SOL and IROL violations are being reported to the Reliability Coordinator so that the Reliability Coordinator may evaluate actions being taken and direct additional corrective actions as needed.	√		M		√
52	TPL-001-0	All	System Performance Under Normal (No Contingency) Conditions	PA, TP	System performance under normal conditions	√	√			
53	TPL-002-0	All	System Performance Following Loss of a Single Bulk Electric System Element	PA, TP	System performance under single contingency	√	√			
54	TPL-003-0	All	System Performance Following Loss of Two or More Bulk Electric System Elements	PA, TP	System performance under multiple contingencies	√	√			
55	TPL-004-0	All	System Performance Following Extreme Events Resulting in the Loss of Two or More Bulk Electric System Elements	PA, TP	System performance under extreme contingencies	√	√			



Program Section 5.2 –2008 Midwest Reliability Organization Implementation Plan

56	VAR-001-1	All	Voltage and Reactive Control	PSE, TOP	To ensure voltage levels, reactive flows, and reactive resources are monitored, controlled, and maintained within limits in real time to protect equipment and the reliable operation of the Interconnection.	√	√			
57	VAR-002-1	All	Generator Operation for Maintaining Network Voltage Schedules	GO and GOP	To ensure generators provide reactive and voltage control necessary to ensure voltage levels, reactive flows, and reactive resources are maintained within applicable Facility Ratings to protect equipment and the reliable operation of the Interconnection.	√	√			√



Attachment B – CIP Implementation Plan

For 2008, 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 2008, 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 2008, 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.)

	Upon Registration	Registration + 12 months	Registration + 24 months	Registration + 36 months
Requirement	All Facilities	All Facilities	All Facilities	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 C – Compliance Audit Schedules

BA, TOP, RC Audit Schedule

Note: All functions for 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
ATC	TOP
CBPC	TOP
DPC	BA, TOP
GRE	BA, TOP
ITC	TOP
LES	BA, TOP
MEC	BA, TOP
MGE	BA
MH	BA, TOP
MISO - RC(2)	RC
MP	BA, TOP
MPC	TOP
MPW	BA, TOP
NPPD	BA, TOP
OPPD	BA, TOP
OTP	BA, TOP
RPW	TOP
SMP	BA, TOP
SPC	BA, TOP, RC
TSGT	TOP
UPPC	BA
WAPA	BA, TOP
WPS	BA
Xcel (NSP)	BA, TOP

<u>2008</u>	<u>Audit Date</u>
DPC	TBD
LES	TBD
CBPC	TBD
MEC	TBD
SPC	TBD
Xcel (NSP)	TBD
ITC	TBD

2009
 GRE
 MH
 MP
 SMP
 MPC
 WPS & UPPC
 MISO-STP
 TSGT

2010
 MPW
 OPPD
 OTP
 MGE
 WAPA
 RPW
 NPPD
 ATC
 ALT

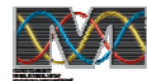


Other Functional Entities Audit Schedule.

2007 was the first year of the six-year cycle. Therefore, the first six-year cycle will be completed in 2012.

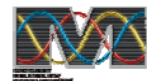
MRO List of "Other" Functional Entities:

Entity 2008:	Entity 2009:	Entity 2010:	Entity 2011:	Entity 2012:	Entity 2013:
FPL Energy Duane Arnold, LLC Aug 6-7	Minnesota Municipal Power Agency (MMPA)	City of Ames Electric Services	White Pine Electric Power, LLC	Sempra Energy Trading Corp.	Adams Columbia Electric Cooperative
PPM Energy Aug 20-21	Watertown Municipal Utilities Department	GEN-SYS Energy	Badger Windpower, LLC	The Energy Authority Inc.	Jo Carroll Energy
Missouri Basin Municipal Power Agency Aug 26-27	Wisconsin Public Power Inc. and Sub-registry	PPL EnergyPlus, LLC	BP Energy Company	Highline Electric Association	Manitowoc Public Utilities
Central Minnesota Municipal Power Agency (CMMPA) Sept 3-4	Marshall Municipal Utilities	Detroit Lakes Public Utilities	Fortis Energy Marketing & Trading GP	City of Grand Island, NE	High Prairie Wind Farm
Wheat Belt Public Power District Sept 10-11	Municipal Energy Agency of Nebraska	Moorhead Public Service	Marshfield Utilities	LSP - Cottage Grove, LP	Merrill Lynch
Midwest Contingency Reserve Sharing Group Sept 17-18	FPL Energy Midwest Wind	Central Iowa Power Cooperative (CIPCO)	Alexandria Light & Power	EPCOR Energy Marketing (US) Inc.	Citigroup Energy Inc.
Cedar Falls Utilities Sept 24-25	Mid-Continent Area Power Pool (MAPP)	Constellation Energy Commodities Group Inc.	ConocoPhillips Company	Wisconsin Rapids Water Works & Lighting Commission	Silver Bay Power Corp.
Lighthouse Energy Trading Co., Inc. Oct 1-2	Pierre Municipal Utilities	Midwest Electric Cooperative Corporation	City of Elkhorn Electric Department	Tenaska Power Services Co.	
Roquette American Oct 8-9	Board of Waterworks & Electric Power Plant Trustees - Atlantic, Iowa	DC Energy Midwest, LLC	Covanta Hennepin Energy Resource Co., LP	Hutchinson Utilities Commission	
Badger Power Marketing Authority Oct 15-16	Corp of Engineers	Basin Electric Power Cooperative	Willmar Municipal Utilities	Escanaba Municipal Electric Utility	
DC Energy, LLC Oct 22-23	Occidental Power Services, Inc.	Dominion Energy Kewaunee, Inc.	DC Energy Mid-Atlantic, LLC	St. Leon Wind Energy LP	
Hastings Utilities Oct 30-31	Calpine Corporation	Panhandle Rural Electric Membership Association, Inc.	Edison Mission Marketing & Trading, Inc.	Heartland Consumers Power District	
Calpine Energy Services Nov 5-6	Northern Iowa Wind Power 1, LLC	Cargill Power Markets, LLC	TransAlta Energy Marketing (U.S) Inc.	Montana-Dakota Utilities Company	
	J. Aron & Company	Dominion Energy Marketing, Inc.	NorthWestern Energy	Cottage Grove Operating Services	



Attachment D – MRO 2008 Self-Certification Compliance Schedule, and Periodic Data Submittal and Reporting

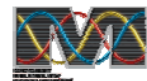
Registered Entities shall report violations to MRO when detected MRO shall report violations to NERC within two days after verification and review of alleged violation	On-going
Self-Certification notification sent to all Registered Entities in MRO footprint	September
Self-Certification forms due to MRO from Registered Entities via CDMS Note: MRO will provide at least 30-days between notification and required submittal date	October
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	Within 30-days after receiving the Notice of Alleged Violation Letter



submitted by Registered Entity within 30-days after being served the notice of alleged violation from MRO	
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, 2008



2008 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
PER	Personnel Credentials	Monthly	By the 10th of the month for previous month	PER-003-0 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 – 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

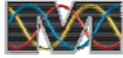


- IRO-016-1 — Coordination of Real-time Activities Between Reliability Coordinators
- PER-004-1 — Reliability Coordinator Staffing
- TOP-001-1 — Reliability Responsibilities and Authorities
- TOP-003-0 — Planned Outage Coordination
- TOP-004-1 — Transmission Operations –for R4 only
- TOP-005-1 — Operational 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



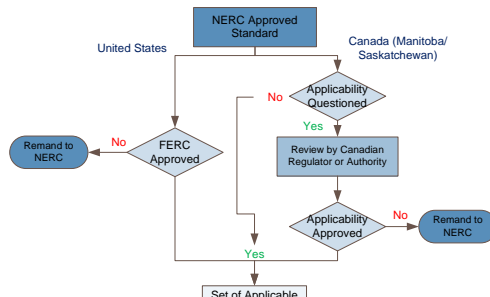
Attachment F – MRO Compliance and Enforcement Process Maps



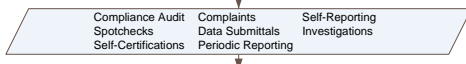


Midwest Reliability Organization Compliance and Enforcement Process Map (United States)

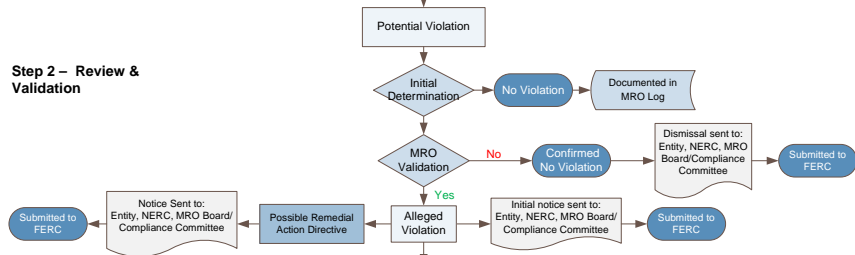
Step 0 – Applicability of Standards



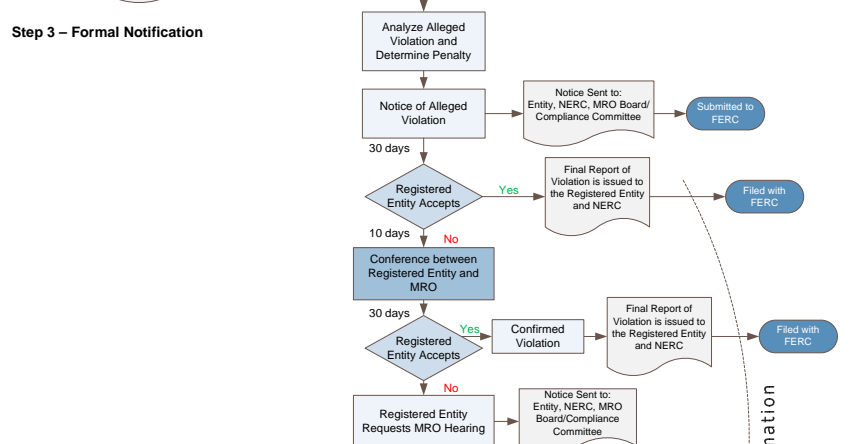
Step 1 – Discovery



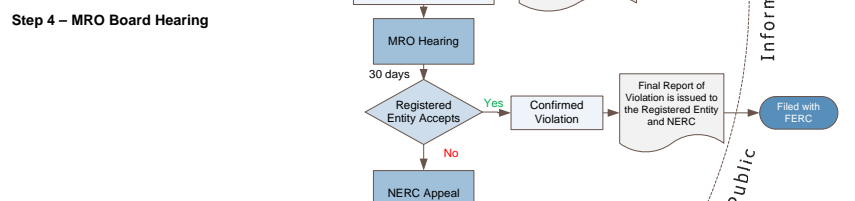
Step 2 – Review & Validation



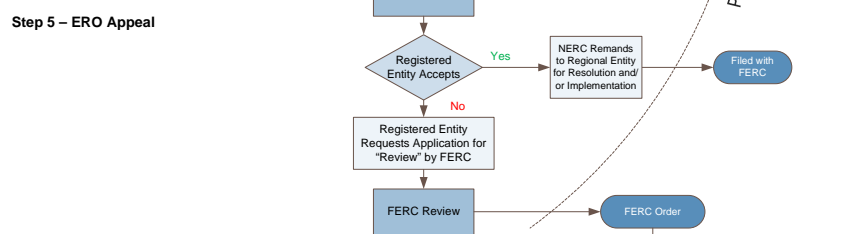
Step 3 – Formal Notification



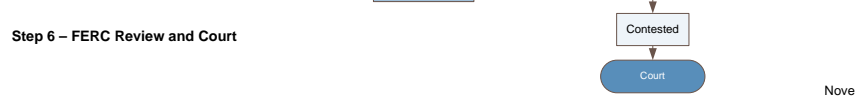
Step 4 – MRO Board Hearing



Step 5 – ERO Appeal

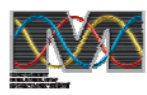


Step 6 – FERC Review and Court



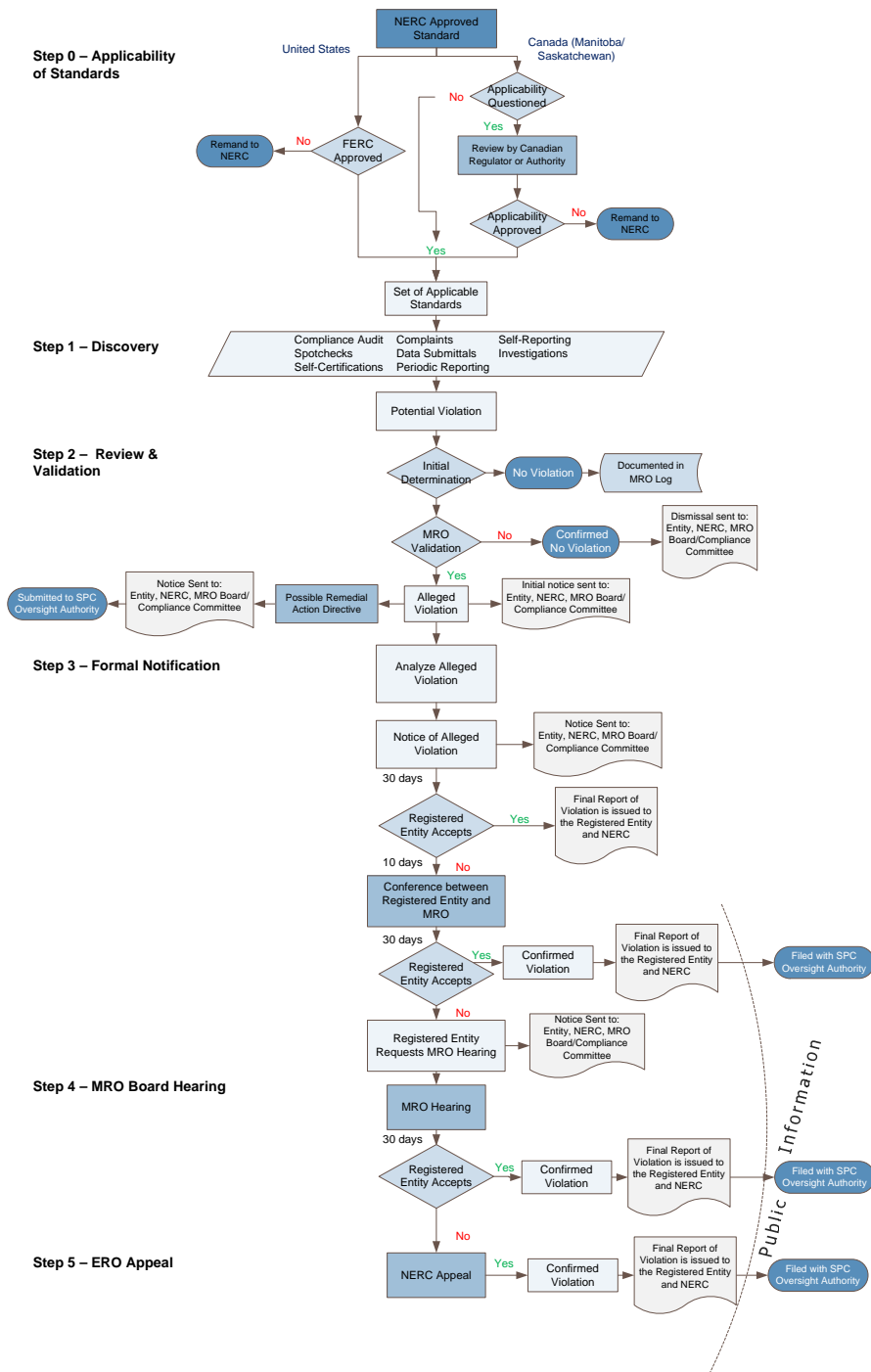
Public Information

November 28, 2007





Midwest Reliability Organization Compliance and Enforcement Process Map (Saskatchewan)



November 28, 2007

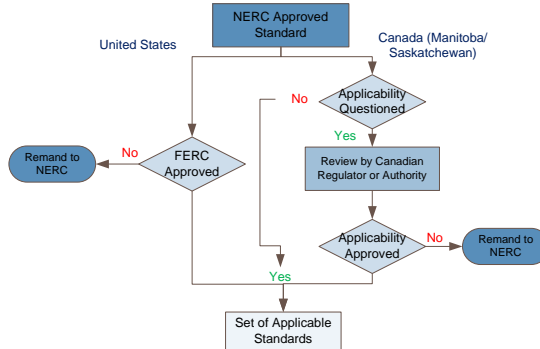




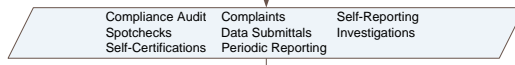
Midwest Reliability Organization Compliance and Enforcement Process Map (Manitoba, Canada)

DRAFT

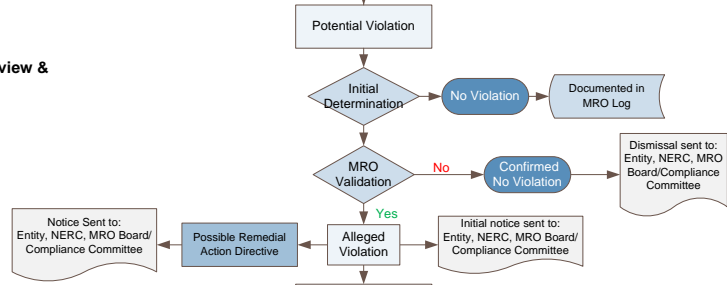
Step 0 – Applicability of Standards



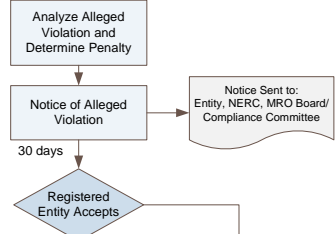
Step 1 – Discovery



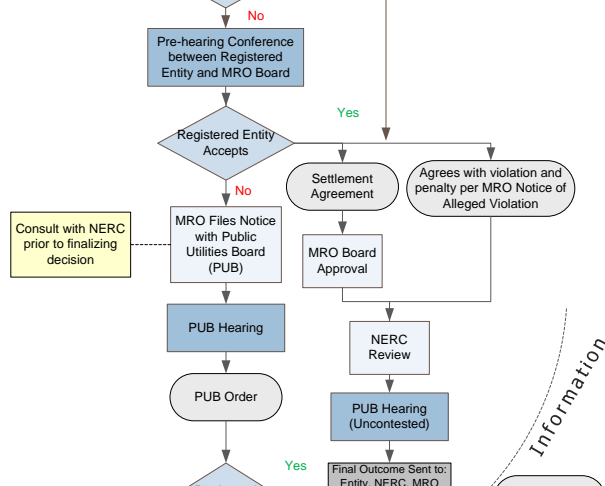
Step 2 – Review & Validation



Step 3 – Formal Notification



Step 4 – PUB Hearing



Step 5 – Court Appeal

November 28, 2007

