

TEXAS REGIONAL ENTITY

AN INDEPENDENT DIVISION OF ERCOT

November 1, 2007

**2008 Regional Implementation Plan
to
Monitor and Enforce Compliance
with
North American Electric Reliability Corporation
Reliability Standards**

Submitted by:
Mark R. Henry, P.E.
Manager, Compliance Review and Verification

**2008 REGIONAL IMPLEMENTATION PLAN TO
MONITOR AND ENFORCE COMPLIANCE WITH
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
RELIABILITY STANDARDS**

TABLE OF CONTENTS

COMPLIANCE PROGRAM OVERVIEW3

REGISTRATION AND ORGANIZATIONAL CERTIFICATION.....5

COMPLIANCE MONITORING6

ENFORCEMENT AND FOLLOW-UP ACTIVITIES9

DATA COLLECTION AND RETENTION11

COMPLIANCE SEMINARS AND WEB INFORMATION11

ATTACHMENT A: TEXAS REGIONAL ENTITY ORGANIZATIONAL CHART12

ATTACHMENT B: 2008 CMEP MATRIX / NERC RELIABILITY STANDARDS13

ATTACHMENT C: 2008 TEXAS REGIONAL ENTITY COMPLIANCE AUDIT SCHEDULE.....25

ATTACHMENT D: CIP IMPLEMENTATION PLAN27

ATTACHMENT E: SPECIAL 48-HOUR REPORTING.....36

Compliance Program Overview

This document describes the background principles along with assessment and enforcement methods used to execute the ERCOT Regional compliance program for North American Electric Reliability Corporation (NERC) Reliability Standards. Further details are contained in NERC's Rules of Procedure and the Regional Delegation Agreement between NERC and the Texas Regional Entity (Texas RE). Sections below and attachments describe the assessments and enforcement related activities planned in 2008.

Implementing Procedures

In the United States, the North American Electric Reliability Corporation (NERC) has delegated its compliance and enforcement authority to Regional Entities, along with certain other duties such as Regional Standards development. All are described in NERC's Rules of Procedure. Within the Electric Reliability Council of Texas's (ERCOT) metered area, the Texas Regional Entity (Texas RE) is assigned to monitor, assess, and enforce compliance to NERC's reliability standards by owners, end-users and operators of the bulk power system in accordance with the Regional Delegation agreement approved by the Federal Energy Regulatory Commission (FERC). 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. Further details can be found in the TRE's Regional Delegation Agreement filing, along with the TRE business plan and budget information.

Governance

Texas RE has been established as an independent division of ERCOT, with provisions made in the ERCOT corporate bylaws to provide the separation necessary to fulfill NERC requirements in this area. The Texas RE Board of Directors governs overall activities including compliance functions; its membership includes representation of different industry market segments. The Chief Compliance Officer reports to the TRE Board and directs staff to achieve the stated program goals. The Texas RE is also not dependent on stakeholder committees in its NERC compliance roles, although reports are provided to ERCOT Regional committees, subcommittees and technical working groups. Further details can be found in the TRE's Regional Delegation Agreement filing, along with the TRE business plan and budget information.

Compliance Staff Role

Texas RE staff handles all activities within the Region for registration along with compliance monitoring and enforcement. Industry volunteers or stakeholder technical committees are not part of these duties. Contractors may be used to augment staff but are not presently part of the work plan for compliance assessment duties. Any contractors used will work under the direction and review of Texas RE in accordance with NERC's Rules of Procedure.

The staff chiefly responsible for compliance-related activities is organized into the Compliance Enforcement group and will report to a Director of Compliance. The Compliance Review and Verification subgroup will perform most monitoring and compliance assessment duties. The Performance Analysis and Assessment subgroup will maintain overall work progress, provide notifications and assure that records and documents are maintained. The Compliance Enforcement subgroups will work with the Legal & Enforcement group as needed to process violations. An organization chart is provided in Attachment A.

2008 Monitored Standards

All standards approved by the NERC are subject to monitoring, although only the subset approved by FERC is subject to the possibility of financial sanctions. NERC has designated a subset of FERC-approved Reliability Standards for active review and reporting across North America in its 2008 Implementation Plan. For these Standards, active monitoring means that Registered Entities within the ERCOT region are required to report on their adherence to the Standards or provide data and information to the Texas RE so that it can establish compliance, in accordance with the assessment approaches in this plan and the NERC Rules of Procedure. Attachment B contains the list of “actively monitored” Standards identified for the 2008 Compliance Program. In 2008, sixty-four (64) NERC Standards, each with a varying number of requirements and sub-requirements, have been selected for review in NERC’s annual program. Two of these apply only in the Western Electric Coordinating Council. All of the actively monitored standards from 2007 are carried forward into the 2008 program. The additions to the program are indicated by highlights and markings in the table in Attachment B.

The Texas RE has not created any Regional Standards at this time to include in the 2008 program. Creation of Regional Standards will begin in 2008, in accordance with the NERC Rules of Procedure and the Texas RE’s Regional Delegation Agreement. Supplemental monitoring of certain requirements contained in the ERCOT Protocols will occur but under the terms of the 2006 Compliance Process filed with the Public Utility Commission of Texas and approved on July 20, 2006. These Protocol compliance-related activities will be conducted so long as the activities do not conflict with the Delegated Authority. Such work is funded separately from the delegated NERC obligations and does not include the provisions for sanctions that apply to NERC standards.

Part of this list of standards includes NERC’s eight (8) cyber and physical security standards, CIP-002-1 through CIP-009-1, totaling forty-one (41) requirements. These will be assessed by means of a special self-assessment survey developed by NERC in early 2008. Registered Entities will identify their progress towards becoming “auditably compliant” per the tables found in Attachment D of this document. In 2008, enforcement of violations for these particular standards will not lead to determination of any sanctions or other penalties as is possible with the other standards. The ERCOT ISO is the only registered entity in ERCOT that must conform to the schedule in Table 1, as the ISO participated in the original Urgent Action (UA1200) program. All other registered entities will fall under the schedule found in Table 3 or Table 4, depending on when the entity first registered with NERC. A NERC CIP self-assessment form will be developed during early 2008 and issued to Registered Entities who perform an applicable

function. All applicable entities must complete the self-assessment survey by a date yet to be determined.

Registration and Organizational 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. Within the ERCOT Region, the ERCOT ISO currently holds registration as the Reliability Coordinator, Balancing Authority, Transmission Operator, Planning Authority, Resource Planner and Transmission Service Provider. The ERCOT ISO will likely become the Interchange Authority during 2008 once registration questions are settled. Other entities in ERCOT hold the remaining NERC functional registrations, either individually or as part of joint registrations. Texas RE has two appeals still unresolved at this time and it continues to monitor developments in other Regions’ appeals related to the Load Serving Entity, Generator Operator and Generator Owner functions. Further activity in joint registration is expected during 2008 as well as ongoing maintenance of registration contacts and data.

Texas RE 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. Texas RE continues to make its best efforts to register all entities subject to the Reliability Standards and will provide its list, with revisions, to the ERO and other applicable authorities as appropriate. Texas RE will perform these updates as specified in the NERC Implementation Plan, and will work with NERC during 2008 to incorporate any further process changes.

Each Registered Entity has a primary compliance contact for issues regarding compliance. This person may or may not be the same as the point of contact as the Entity’s contact maintained for its ERCOT registration as defined by the ERCOT Protocols. It is the responsibility of each Registered Entity to keep its compliance contact information up-to-date. Texas RE will not be using the same contact lists for compliance communications as maintained by the ERCOT ISO’s Wholesale Account Managers.

Organizational Certification requirements and processes will be provided by NERC and Texas RE will carry out those responsibilities. In 2008, there are no planned Certification activities other than to affirm the current certification of the ERCOT ISO as Reliability Coordinator, Balancing Authority and Transmission Operator for this Region. It is possible that development of joint registration, particularly for the Transmission Operator function, will lead to additional Registered Entities requiring certification. The Texas RE will initiate, schedule and lead any such additional Certification audits in accordance with the NERC processes as required.

Compliance Monitoring

Texas RE expects to utilize the monitoring methods as described in Section 3 of Appendix 4C of NERC's Rules of Procedure, the uniform Compliance Monitoring and Enforcement Program (CMEP). Texas RE will use internal procedures, checklists and forms to aid in execution of the steps required in the CMEP. After review, any possible violations uncovered by these means will be handled through the enforcement actions detailed in Section 5 of the same document. The designated primary compliance contact at the Registered Entity shall serve as the single point of contact with Texas RE for communication regarding monitoring and assessment.

Compliance Audits

Auditing is the primary tool for compliance monitoring. 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. Audits begin with notification of the entity and questionnaires sent two months prior to the published audit time. Steps outlined in Section 3.1 of the CMEP will be followed in conducting the audit and issuing the audit report, in addition to the NERC Compliance Auditor Manual. Feedback will be requested from audit team members and the Registered Entity following the audit, using forms and steps developed and amended by NERC for this purpose. As noted earlier, current plans call for Texas RE staff to perform all audits, which will examine those standards included in the 2008 actively monitored program and also review evidence for previous year's compliance with standards in the 2007 actively monitored program (to the start date of the program, June 18, 2007). Texas RE auditors – whether staff or possible contractors – will abide by the code of conduct, respect confidentiality and conflict of interest provisions, and complete NERC auditor training prior to participation in audits.

As the ERCOT ISO presently holds the only registration for top level NERC functions of Reliability Coordinator, Balancing Authority, and Transmission Operator, Planning Authority, and Resource Planner, Texas RE plans to conduct an on-site audit in 2008 of those standards added to the program in 2008 that are applicable to the ISO, as well as review any issues from previous audits or assessments. (The ERCOT ISO was audited in 2007 for those standards in the 2007 program.) NERC staff will play a lead role in this audit. Other ERCOT entities who maintain a local control center in direct operational communication with ERCOT have received audits on a three year cycle, and that effort will continue in 2008. These entities have local control centers connected to the ERCOT ISO's wide-area communications network and have also signed agreements under the ERCOT Protocols as Transmission and Distribution Service Providers (TDSP's) or Qualified Scheduling Entities (QSE's). These entities typically hold NERC Registrations as Transmission Owners or Generator Operators, respectively (although other arrangements may exist). These audits involving the ISO and local control centers will be conducted on-site at the entity. Within the ERCOT Region, compliance audits

for other entities will be on a six-year cycle consistent with their NERC registration. These audits are planned as off-site reviews. Texas RE may additionally request unscheduled audits following events or significant changes in an entity's status.

Attachment C includes a schedule of all NERC compliance audits to be conducted in 2008 and the identity of the entity scheduled for audit.

Self-Certification

Texas RE will continue to use self-certification by Registered Entities to affirm that they meet requirements of applicable, actively monitored Reliability Standards in the 2008 program. Registered Entities subject to a compliance audit during the 2008 program year will not typically be expected to provide a self-certification.

Past years' self-certification involved transmittal and completion of a response form that listed applicable standards; in 2008 Texas RE plans to roll-out a web-based portal similar to that used by three other Regions (Midwest Reliability Organization's Compliance Data Management System, or CDMS). As in the past, and in accordance with the NERC CMEP Section 3.2, Registered Entity notification will be provided at least 30 days prior to due dates to prepare their response. Typically, data is not included with self-certifications. The data will be reviewed and validated via subsequent audits or spot (*i.e.* random) checks. Texas RE will review all self-certifications and determine the final status of compliance where possible violations are indicated by the Registered Entity, which may require contacting the entity for supplemental information to provide a record. Details on self-certifications will be posted on the Texas RE webpage to assist Registered Entities.

Self-certifications are planned for September of 2008, with responses due in October. Again, details will be provided at the time of notification, along with postings on the Texas RE webpage.

Spot (Random) Checks

Spot checking is intended primarily to verify a sample of self-certifications but may also be initiated in response to system events or to validate periodic data submittals, as described in Section 3.3 of the NERC CMEP. Texas RE may randomly select functions, registered entities, or particular requirements of Standards to conduct a spot check, with the latter approach most commonly used.

Whether initiated in response to events or operating problems as described in a Reliability Standard, system events, or conducted as a follow-up to self-certifications, the Texas RE will notify the Registered Entity. Unless a particular Reliability Standard specifies the advance notice period, the Registered Entity will be allowed at least 20 days for the information to be submitted or available for review. This request may include data, documentation, or possibly an on-site review, depending on the standard. If a particular information format is needed, it will be specified in the request to the Registered Entity.

Texas RE staff will review the information submitted to determine compliance with the Reliability Standards and may request additional data and/or information if necessary for a complete assessment of compliance.

Upon completion of its assessment of the Registered Entity for compliance with the Reliability Standard, Texas RE will provide a report to the Registered Entity indicating the results of the spot check. If a violation is indicated, a notice will be sent to the Registered Entity as with other violations and handled accordingly.

Periodic Data Submittals

Periodic submittals consist of monthly, quarterly, and annual data submittals specified in certain Reliability Standards such as BAL-001-0. Texas RE will monitor these submittals to confirm that requirements are met per Section 3.6 of the CMEP. For monthly and quarterly submittals, the Texas RE will post the current data submittal reporting schedule and required formats on its web site and inform the Registered Entities of changes or updates. Annual submittals will include direct notification to the Registered Entities of such data submittal requirements at least 30 days prior to requested date of submittal if not otherwise specified in the Reliability Standard. As necessary, the Texas RE may use escalating notices in the Rules of Procedure's Process for Non-Submittal of Requested Data (to address lack of timeliness in submittals).

Investigations

Investigations are used to confirm or deny all alleged or probable violations identified by Texas RE, NERC or other parties. A compliance violation investigation may be initiated at any time by Texas RE or NERC in response to a system disturbance or possible violation with a Reliability Standard as identified by any means. Compliance violation investigations will generally be led by Texas RE staff. However, for good cause, NERC reserves the right to assume the leadership of a compliance violation investigation.

In general, notices and steps described in Section 3.4 of the CMEP will be used for investigations. Texas RE staff will investigate and determine if violations may have occurred. Texas RE staff may, at its discretion, use site visits, data submittals, or other means to further evaluate compliance with Reliability Standards pertinent to the event.

Complaints

NERC or Texas RE may receive a complaint from individuals or entities alleging a violation with a Reliability Standard by one or more Registered Entities. The Texas RE will conduct a review of each complaint it receives to determine if the complaint provides sufficient basis for a compliance violation investigation, and provide notification to NERC in the agreed upon format. Exceptions are that NERC will

review any complaint (1) that is related to Texas RE in its performance related to the functions in the delegation agreement, (2) where the Texas RE 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. Notices and steps described in Section 3.8 of the CMEP will be used; the process is very similar to investigations described above and allows for similar requests for additional information.

Self - Reporting

Self-reporting is defined as 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. It differs from Self-Certification in that no request is made by the Texas RE for the internal review. Self-reporting is encouraged when a Registered Entity identifies internal violations; it will be considered a mitigating factor when the Texas RE determines the appropriate sanction or penalty. A form is provided on the Texas RE website for self-reported violations for this purpose. Upon receiving such completed forms, Texas RE staff will review the information and evaluate the reported non-compliance, per CMEP Section 3.5.

Exception Reporting

Some Reliability Standards require reporting of exceptions to compliance with the Reliability Standard as a form of compliance monitoring. Per Section 3.7 of the CMEP, the Texas RE shall require Registered Entities to provide Exception Reports identifying any possible violations to the extent required by any Reliability Standards. The Texas RE 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.

Enforcement and Follow-up Activities

Section 5, 6 and 7 of the CMEP will be followed by the Texas RE in its evaluation and processing of violations in the ERCOT Region, calculation of appropriate sanctions and handling of associated mitigation plans.

Enforcement Steps

Possible violations resulting from any of the monitoring activities above shall be reviewed further by Texas RE staff to validate the evidence. If the evidence obtained suggests that a violation has occurred, then the violation reporting process is initiated. An initial violation notice will then be sent to the Registered Entity. This initial notice will describe the standard and requirements violated, the time of the finding, and the basis for the finding, but will not include any calculation of sanctions. Concurrently, an entry will be made in NERC's violation tracking

tool to provide confidential notice to NERC. Both notifications will be made within 5 business days of the validation, to fulfill this reporting obligation of the CMEP. However, if the violation has resulted in (or has the potential to result in) a reduced level of reliability to the bulk power system (per Section 408 of the NERC Rules of Procedure), Texas RE shall notify NERC within 48 hours. A group of Reliability Standards and requirements that carry this expedited notice are identified in Attachment E, Special 48 Hour Reporting.

Sanction calculations in accordance with NERC's Sanction Guidelines contained in Appendix 4B of the Rules of Procedure will follow these initial notifications, including evaluation of factors that may diminish or increase a sanction. Upon completion of sanction calculation, a formal Notice of Alleged Violation will be issued to the Registered Entity, using the format developed by NERC containing the six elements of CMEP Section 5.1. This Notice will be signed by an officer or designee of the Texas RE and copied to NERC.

The Registered Entity will have 30 days to review the finding and sanction, and either accept or contest them. If the finding and sanction are not contested, Texas RE will issue a final report of Confirmed Violation to the Registered Entity, copied to NERC and accompanied by any written explanatory statements provided by the Registered Entity. At a later date, following approval of the sanction by FERC, Texas RE will invoice and collect the sanction. Alternatively, if a Registered Entity contests any violation, Texas RE will schedule a conference within ten (10) business days and attempt to resolve the concerns within forty (40) days in accordance with Section 5.2 of the CMEP. If resolution is not achieved, the Registered Entity may then request a hearing.

Directives for remedial actions may be issued by Texas RE to a Registered Entity at any time should it appear that such actions are needed to protect the bulk power system from an imminent threat. Such actions shall be conducted in conformance with Section 7 of the CMEP.

Mitigation Plans

A Registered Entity found to allegedly be in violation of a Reliability Standard shall be directed to file a proposed Mitigation Plan to correct the violation with the Texas RE, along with any request for extension to an existing mitigation plan, and a report of a completed mitigation. Texas RE will follow the steps and timing for mitigation plan review and acceptance as listed in CMEP Section 6, along with tracking of progress and notifications to the Registered Entity and NERC. Texas RE has created a standard form for filing of Mitigation Plans that is available on its website; later in 2008, filings may be accomplished through a web-portal interface.

Regional Hearings Overview

The Rules of Procedure mandates that a Hearing Process be available to a Registered Entity for contesting an alleged violation, penalty, sanction, mitigation plan requirement, or remedial action directive. If a Registered Entity requests a hearing, then Texas RE will initiate the process. The hearing body will be the PUCT, and the hearing will be conducted as detailed in the Texas RE's Regional Delegation Agreement (Attachment 1 to Exhibit D of that document). The hearing body shall issue a recommendation to the Chief Compliance Officer of the Texas RE, who in

turn will issue a decision accepting or rejecting this recommendation. Details and timelines of this procedure are contained in the Texas RE Delegation Agreement. Records and notification will be provided to document the hearing results in accordance with the Rules of Procedure, and allow for the Registered Entity to appeal to NERC if it so chooses.

Settlements

Prior to initiation of a formal hearing with the PUCT as described above, Texas RE staff may agree on a settlement with a Registered Entity for a specific occurrence of non-compliance. All settlement agreements must conform to requirements of NERC Rules of Procedure 403.18. In the event of a settlement, Texas RE will issue a letter detailing the terms for NERC's review and approval. A second attempt will be made to negotiate a settlement by the Texas RE should NERC reject a settlement agreement; if that proves unsuccessful, the hearing process will proceed to its conclusion.

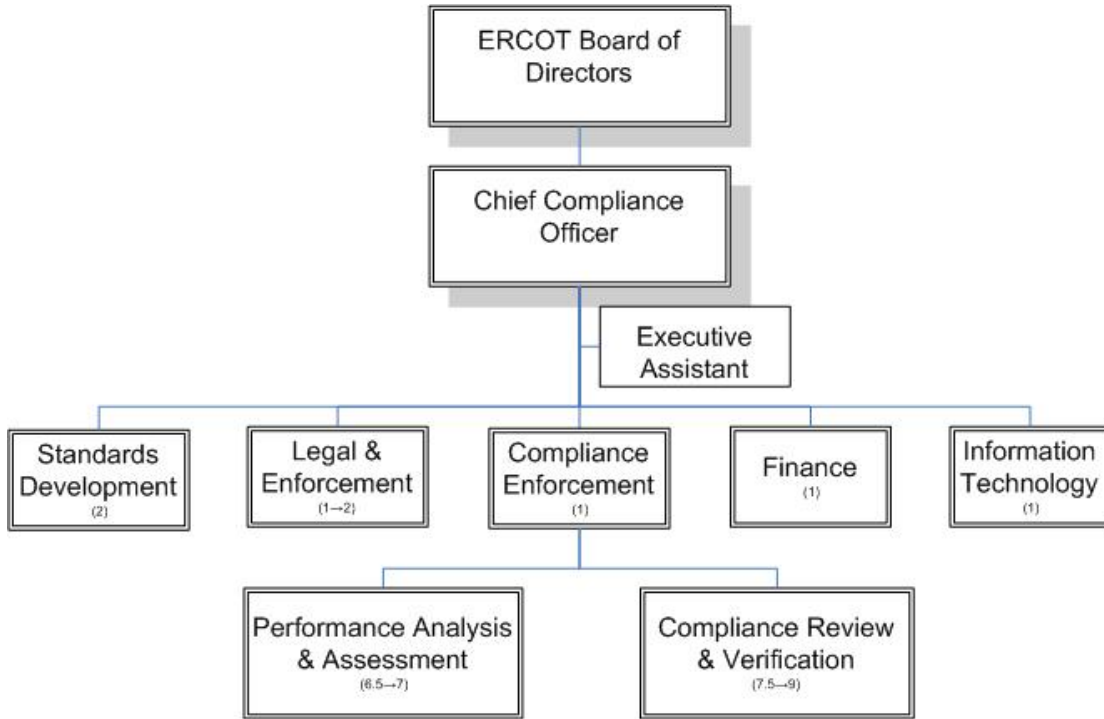
Data Collection and Retention

The Texas RE will ensure that records related to the compliance program, both hard copy and electronic, are maintained in a secure location, according to the records management and retention requirements identified in Section 9 of the CMEP. Record retention policy and practice will provide for a minimum five (5) year retention period unless longer intervals are required by certain Reliability Standards. During 2008, Texas RE plans to transition to wider usage of a web-portal and database system noted earlier, the CDMS.

Compliance Seminars and Web Information

The Texas RE will conduct at least two general workshops on the Compliance program during 2008, tentatively with day-long events in spring and fall. Use of web-ex capability to reach a wider audience is being evaluated, as are other means of outreach. The Texas RE webpage provides access to documents, forms and background material associated with compliance monitoring and enforcement, as well as other statutory functions. Extensive modification to the Texas RE webpage is planned beginning in late 2007, with the goal of making access to information more straightforward for Registered Entity personnel.

Attachment A: Texas Regional Entity Organizational Chart



Numbers under each group refer to 2007 staff; arrows indicate budgeted 2008 staff changes.

Attachment B: 2008 CMEP Matrix / NERC Reliability 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. Blue highlights in the standard # column, along with a “-8” in the 3-year on site audit, indicate new requirements in 2008.

2008 CMEP Matrix NERC Reliability Standards									
Std #	Requirements	Standard	Who	Purpose	3 or 6 - Year On-Site Audit	Self-Certification	Monthly/Quarterly Reporting	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.	√-8				

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.	√-8				
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.	√-8				
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.	√-8		M	√	
BAL-STD-002-0	All-WECC Only	Operating Reserves (WECC)	BA and RSG	Regional Reliability Standard to address the Operating Reserve requirements of the Western Interconnection.	√-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.	√	√			

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	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.	√	√			
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.	√-8	√			
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-002-2	All	Capacity and Energy Emergencies	RC and BA	To ensure Reliability Coordinators and Balancing Authorities are prepared for capacity and energy emergencies.	√-8	√			√
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-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.	√-8	√			√
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.	√	√			
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.	√-8	√			

INT-001-2	All	Interchange Information	BA and PSE	To ensure that Interchange information is submitted to the NERC-identified reliability analysis service.	√-8	√			√
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.	√-8	√			√
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.	√-8				
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-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.	√-8	√			√

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-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.	√-8				
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.	√-8				√

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.	√	√			
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.	√	√			
IRO-STD-006-0	All – WECC Only	Qualified Path Unscheduled Flow Relief (WECC)	BA, TOP and LSE	Mitigation of transmission overloads due to unscheduled line flow on Qualified Paths.	√-8			√	
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-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.	√-8	√			√
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.	√-8	√			√
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.	√	√		√	

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.	√			√	
TPL-001-0	All	System Performance Under Normal (No Contingency) Conditions	PA, TP	System performance under normal conditions	√	√			
TPL-002-0	All	System Performance Following Loss of a Single Bulk Electric System Element	PA, TP	System performance under single contingency	√	√			
TPL-003-0	All	System Performance Following Loss of Two or More Bulk Electric System Elements	PA, TP	System performance under multiple contingencies	√	√			
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	√	√			
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.	√	√			

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.	√-8	√			√
-----------	-----	--	------------	--	-----	---	--	--	---

Attachment C: 2008 Texas RE Compliance Audit Schedule

10-22-07		
Registered Entity Name	Function/s	Proposed Audit Date
CITY OF GARLAND (QSE)	GOP	1/08-1/09-2008
BTU QSE SERVICES INC	GOP	1/16-1/17-2008
BASTROP ENERGY PARTNERS LP	GO	1/23-1/24-2008
CITY OF AUSTIN DBA AUSTIN ENERGY (RES)	GO	1/30-1/31-2008
CITY OF AUSTIN DBA AUSTIN ENERGY (QSE)	GOP	1/30-1/31-2008
COLETO CREEK POWER LP	GO, TO	2/12-2/14-2008
HAYS ENERGY LP	GO	2/12-2/14-2008
MIDLOTHIAN ENERGY LP	GO, TO	2/12-2-14-2008
BRAZOS ELECTRIC POWER CO OP INC	TO, TP	2/27-2/28-2008
CITY OF SAN ANTONIO CITY PUBLIC SERVICE	TO, TP,DP	3/05-3/06-2008
ERCOT ISO Readiness Review		3/10-03/13-2008
PEDERNALES ELEC CO OP INC	TO, TP,DP	3/12-3/13-2008
RIO NOGALES POWER PROJECT LP	GO	3/26-3/27-2008
TEXAS-NEW MEXICO POWER CO	TO, TP	4/09-4/10-2008
GUADALUPE VALLEY ELECTRIC CO OP INC	TO, TP	4/16-4/17-2008
DIRECT ENERGY LP	GOP	4/29-4/30-2008
BOSQUE POWER COMPANY LLC	GO	5/07-5/08-2008
FORMOSA UTILITY VENTURE LTD	GO	5/14-5/15-2008
CITY OF COLLEGE STATION	TO, TP,DP	5/21-5/22-2008
RELIANT ENERGY POWER SUPPLY LLC (QSE)	GOP	6/04-6/05-2008
RELIANT ENERGY CHANNELVIEW LP	GO	6/04-6/05-2008
NEW BRAUNFELS UTILITIES	TO, TP,DP	6/18-6/19-2008
BRYAN TEXAS UTILITIES	TO, TP,DP	6/25-6/26-2008
COLLIN POWER COMPANY LLC (TXU site)	GO	7/23-7/24-2008
TRADINGHOUSE COMPANY LP (RES)	GO	7/23-7/24-2008
TRENT WIND FARM LP	GO	8/6-8/7-2008
ALTURA COGEN, LLC	GO	8/13-8/14-2008
BANDERA ELECTRIC CO OP INC	TO, TP,DP	8/20-8/21-2008
BPTX	see note	8/29-8/30-2008
SOUTH HOUSTON GREEN POWER, LP	GO, GOP	8/29-8/30-2008
GUADALUPE POWER PARTNERS, LP	GO, GOP	8/29-8/30-2008
ODESSA POWER PARTNERS, LP	GO, GOP	8/29-8/30-2008
ERCOT ISO - Operations	TO, RC, BAL	9/08-9/12-2008

AIR LIQUIDE LARGE INDUSTRIES U.S. LP	GO	9/24-9/25-2008
AES DEEPWATER INC	GO	10/01-10/02-2008
FRONTERA GENERAL LIMITED PARTNERSHIP	GO	10/15-10/16-2008
SWEENEY COGENERATION GENERAL LP	GO	10/18-10/19-2008
RAYBURN COUNTRY CO OP DBA RAYBURN ELECTRIC (TDSP)	DP	10/22-10/23-2008
WOLF HOLLOW I LP	GO, GOP	10/29-10/30-2008
TENASKA GATEWAY PARTNERS LTD	GO, GOP	11/06-11/07-2008
KIOWA POWER PARTNERS,	GO, GOP, TO	11/06-11/07-2008
CORAL POWER LLC	see note	11/06-11/07-2008
TENASKA POWER SERVICES (QSE)	see note	11/12-11/13-2008
Note: Registration questions remain regarding the applicable NERC functions which may include GOP, PSE or other functions.		

Attachment D: 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 will be developed in coordination with NERC.

“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

	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-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
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 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