NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

June 5, 2008

Ms. Kimberly Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: NERC Notice of Penalty regarding Sam Rayburn G&T Electric Cooperative, Inc., FERC Docket No. NP08-_-000

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this Notice of Penalty regarding Sam Rayburn G&T Electric Cooperative, Inc.,[1] in accordance with the Federal Energy Regulatory Commission's (Commission or FERC) rules, regulations and orders, as well as NERC Rules of Procedure including Appendix 4C (NERC Compliance Monitoring and Enforcement Program (CMEP)).[2]

This Notice of Penalty is being filed with the Commission because, based on information from SERC Reliability Corporation, Sam Rayburn G&T Electric Cooperative, Inc. submitted self-certifications of the violations at issue and did not respond to the previously issued Notice of Alleged Violation and Proposed Penalty or Sanction within thirty (30) days of its receipt and is thereby deemed to have accepted the violations of CIP-001-1 R.1-4, PRC-005-1 R.1 and FAC-008-1 R.1 and proposed penalty of $0 to be assessed to Sam Rayburn G&T Electric Cooperative, Inc. at issue in this Notice of Penalty. Accordingly, the violations identified as NERC Violation Tracking Identification Numbers SERC200700018, SERC200700024, SERC200700027, SERC200700028, SERC200700029 and SERC200700030 are Confirmed Violations, as that term is defined in the NERC Rules of Procedure and the CMEP.

Statement of Findings Underlying the Violations

This Notice of Penalty incorporates by reference the findings and justifications set forth in the Notice of Confirmed Violation and Proposed Penalty or Sanction (NOC) issued on March 26, 2008, by SERC Reliability Corporation. The details of the findings and basis for the penalty are

[1] *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards* (Order No. 672), III FERC Stats. & Regs. ¶ 31,204 (2006); *Notice of New Docket Prefix "NP" for Notices of Penalty Filed by the North American Electric Reliability Corporation*, Docket No. RM05-30-000 (February 7, 2008). *See also* 18 C.F.R. Part 39 (2008). *Mandatory Reliability Standards for the Bulk-Power System*, FERC Stats. & Regs. ¶ 31,242 (2007) (Order No. 693), *reh'g denied*, 120 FERC ¶ 61,053 (2007) (Order No. 693-A).
[2] *See* 18 C.F.R § 39.7(c)(2).

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set forth in Table 1 of the NOC, as well as the determinations of the NERC Board of Trustees Compliance Committee (NERC BOTCC) in its decision. In accordance with Section 39.7 of the Commission's regulations, 18 C.F.R. § 39.7 (2007), NERC provides the following summary table identifying each Reliability Standard violated by Sam Rayburn G&T Electric Cooperative, Inc.

NOP ID	Region	Registered Entity	NOC ID	NERC Violation ID	Reliability Std.	Req. (R)	VRF	Total Penalty ($)
NOP-24	SERC	Sam Rayburn G&T Electric Cooperative, Inc.	NOC-32	SERC200700018	PRC-005-1	1	High	0
	SERC	Sam Rayburn G&T Electric Cooperative, Inc.	NOC-32	SERC200700024	FAC-008-1	1	Lower/ Medium	0
	SERC	Sam Rayburn G&T Electric Cooperative, Inc.	NOC-32	SERC200700027	CIP-001-1	1	Medium	0
	SERC	Sam Rayburn G&T Electric Cooperative, Inc.	NOC-32	SERC200700028	CIP-001-1	2	Medium	0
	SERC	Sam Rayburn G&T Electric Cooperative, Inc.	NOC-32	SERC200700029	CIP-001-1	3	Medium	0
	SERC	Sam Rayburn G&T Electric Cooperative, Inc.	NOC-32	SERC200700030	CIP-001-1	4	Medium	0

In summary, CIP-001-1 R.1 requires Sam Rayburn G&T Electric Cooperative, Inc. to have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi-site sabotage affecting larger portions of the Interconnection.

CIP-001-1 R.2 requires Sam Rayburn G&T Electric Cooperative, Inc. to have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.

CIP-001-1 R.3 requires Sam Rayburn G&T Electric Cooperative, Inc. to provide its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events.

CIP-001-1 R.4 requires Sam Rayburn G&T Electric Cooperative, Inc. to establish communication contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials and develop reporting procedures as appropriate to their circumstances.

PRC-005-1 R.1 requires Sam Rayburn G&T Electric Cooperative, Inc., which owns a Protection System, to have a Protection System maintenance and testing program for Protection Systems that affect the reliability of the BPS.

FAC-008-1 R.1 requires an entity, such as Sam Rayburn G&T Electric Cooperative, Inc., to document its current methodology used for developing Facility Ratings (Facility Ratings Methodology) of its solely and jointly-owned Facilities.

With respect to CIP-001-1 R.1-4, Sam Rayburn G&T Electric Cooperative, Inc.'s Emergency Operations Plan did not address recognition of sabotage events, communicating sabotage events to the Interconnection, or contact with Federal law enforcement officials. Further, employee training in recognition of sabotage has not occurred. Sam Rayburn G&T Electric Cooperative, Inc. reported the referenced violations in a self-certification dated October 1, 2007.

With respect to PRC-005-1 R.1, Sam Rayburn G&T Electric Cooperative, Inc.'s program did not include maintenance cycles or their basis for the components specified in the standard and did not include a summary of the maintenance and testing procedures. Sam Rayburn G&T Electric Cooperative, Inc. reported the referenced violations in a self-certification dated August 31, 2007.

With respect to FAC-008-1 R.1, Sam Rayburn G&T Electric Cooperative, Inc.'s Facility Rating Methodology document did not specifically state that the most limiting equipment rating of the Facility determines the Facility Rating. Additionally, the methodology for both Normal and Emergency ratings of facilities was not defined within the Facility Rating Methodology document. Sam Rayburn G&T Electric Cooperative, Inc. reported the referenced violations in a self-certification dated August 31, 2007.

CIP-001-1 R.1-4 have a "Medium" VRF; PRC-005-1 R.1 has a "High" VRF; FAC-008-1 R.1 has a "Lower" VRF, although the sub-requirements have a "Medium" VRF. While the standards as approved utilize Levels of Non-Compliance, SERC Reliability Corporation assessed the violations of CIP-001-1 R.1-4 as a "High" Violation Severity Level (VSL); PRC-005-1 R.1 as a "High" VSL; and FAC-008-1 R.1 as a "Moderate" VSL. Based on the NERC Sanction Guidelines Base Penalty Table, the possible penalty range for a "Medium" VRF and a "High" VSL is $6,000 to $200,000. The possible penalty range for a "High" VRF and a "High" VSL is $12,000 to $625,000, and the possible Penalty Range for a "Lower" VRF and a "Moderate" VSL is $2,000 to $7,500.

However, Section 4.4.2 of the NERC Sanction Guidelines states that:

> If the actual or foreseen impact of the violation is judged to be inconsequential by NERC or the regional entity and the violation is the first incidence of violation of the requirement in question by the violator, NERC or the regional entity may at its discretion: (i) set the Base Penalty Amount to a value it deems appropriate within the initial value range set above pursuant to Section 4.1, *or (ii) excuse the penalty for the violation (i.e. set the Base Penalty Amount* to 0$).[3]

[3] *Id.* (emphasis added).

SERC exercised its discretion to assess no penalty for these violations because (1) they occurred during the period of transition to mandatory standards during which the Commission authorized such discretion (*see* Order Nos. 693 and 693-A[4]); and (2) the violations were deemed by SERC Reliability Corporation not to be violations that put bulk power system reliability at serious or substantial risk.

Status of Mitigation Plan[5]

Sam Rayburn G&T Electric Cooperative, Inc.'s Mitigation Plans were accepted by SERC Reliability Corporation on December 11, 2007 and February 11, 2008 and were approved by NERC on December 11, 2007 and February 11, 2008. The Mitigation Plans for the violations listed are designated as MIT-07-0194, MIT-07-0241 and MIT-07-0238, and were submitted as non-public information to FERC on December 11, 2007 and February 11, 2008, in accordance with FERC orders. Sam Rayburn G&T Electric Cooperative, Inc. requested and received permission from SERC Reliability Corporation for an extension of the completion date of February 29, 2008 for MIT-07-0238. Sam Rayburn G&T Electric Cooperative, Inc. certified the Mitigation Plans were completed on February 29, 2008, February 20, 2008, and January 31, 2008. SERC Reliability Corporation reviewed evidence submitted by Sam Rayburn G&T Electric Cooperative, Inc. in support of its certification of completion of the subject Mitigation Plans, and, on February 25, 2008, March 8, 2008 and March 11, 2008, verified Sam Rayburn G&T Electric Cooperative, Inc.'s certification that the Mitigation Plans were completed.

Statement Describing the Proposed Penalty, Sanction or Enforcement Action Imposed[6]

FERC Order Excerpts

In Order No. 693, the Commission provided guidance to NERC and the industry on the determination of penalties during the first six month period of mandatory and enforceable Reliability Standards:

> 222. . . . In light of commenters' concerns, including the fact that there are new aspects to the Reliability Standards and the proposed compliance program that will apply to all users, owners and operators of the Bulk-Power System, *the Commission directs the ERO and Regional Entities to focus their resources on the most serious violations during an initial period through December 31, 2007*. This thoughtful use of enforcement discretion should apply to all users, owners and operators of the Bulk-Power System, and not just those new to the program as originally proposed in the NOPR. This approach will allow the ERO, Regional Entities and other entities time to ensure that the compliance monitoring and enforcement processes work as intended and that all entities have time to implement new processes.

[4] *See* n.1 *supra.*
[5] *See* 18 C.F.R § 39.7(d)(7).
[6] *See* 18 C.F.R § 39.7(d)(4).

> 223. *By directing the ERO and Regional Entities to focus their resources on the most serious violations through the end of 2007, the ERO and Regional Entities will have the discretion necessary to assess penalties for such violations, while also having discretion to calculate a penalty without collecting the penalty if circumstances warrant*. Further, even if the ERO or a Regional Entity declines to assess a monetary penalty during the initial period, they are authorized to require remedial actions where a Reliability Standard has been violated. Furthermore, where the ERO uses its discretion and does not assess a penalty for a Reliability Standard violation, we encourage the ERO to establish a process to inform the user, owner or operator of the Bulk-Power System of the violation and the potential penalty that could have been assessed to such entity and how that penalty was calculated. We leave to the ERO's discretion the parameters of the notification process and the amount of resources to dedicate to this effort. Moreover, the Commission retains its power under section 215(e)(3) of the FPA to bring an enforcement action against a user, owner or operator of the Bulk-Power System.
>
> 224. *The Commission believes that the goal should be to ensure that, at the outset, the ERO and Regional Entities can assess a monetary penalty in a situation where, for example, an entity's non-compliance puts Bulk-Power System reliability at risk.* Requiring the ERO and Regional Entities to focus on the most serious violations will allow the industry time to adapt to the new regime while also protecting Bulk-Power System reliability by allowing the ERO or a Regional Entity *to take an enforcement action against an entity whose violation causes a significant disturbance.* Our approach strikes a reasonable balance in ensuring that the ERO and Regional Entities will be able to enforce mandatory Reliability Standards in a timely manner, while still allowing users, owners and operators of the Bulk-Power System time to acquaint themselves with the new requirements and enforcement program. In addition, our approach ensures that all users, owners and operators of the Bulk-Power System take seriously mandatory, enforceable reliability standards at the earliest opportunity and before the 2007 summer peak season.[7]

Basis for Determination

Taking into consideration the Commission's direction in Order No. 693 and the NERC Sanction Guidelines, the NERC BOTCC reviewed the NOC and supporting documentation on April 24, 2008 and May 5, 2008.

The NERC BOTCC affirmed SERC Reliability Corporation's determination to exercise enforcement discretion to impose a zero dollar ($0) penalty against Sam Rayburn G&T Electric Cooperative, Inc., based upon the NERC BOTCC's review of the applicable requirements of the

[7] Order No. 693 at PP 222-224 (emphasis added).

Commission-approved Reliability Standards and the underlying facts and circumstances of the violations at issue.

In reaching this determination, NERC BOTCC considered the following: (1) As to the instant violations of CIP-001-1 R.1-4, PRC-005-1 R.1, and FAC-008-1 R.1, which were self-certified by Sam Rayburn G&T Electric Cooperative, Inc., SERC Reliability Corporation deemed the violations as documentation issues not representing substantive lapses in its actual procedures. SERC Reliability Corporation made no findings that Sam Rayburn G&T Electric Cooperative, Inc. did not have a maintenance plan and schedule, or facility ratings; (2) No system disturbance occurred as a result of the violations, and the violations were deemed not to be violations that put bulk power system reliability at serious or substantial risk; (3) The violations occurred prior to January 2008 (during the period the Commission stated NERC and the Regional Entities should focus their enforcement resources on the most serious violations and those that involved a significant disturbance); (4) The violations are the first incidence of violations of the Requirements at issue by Sam Rayburn G&T Electric Cooperative, Inc.; (5) Sam Rayburn G&T Electric Cooperative, Inc. worked cooperatively with SERC Reliability Corporation; (6) Sam Rayburn G&T Electric Cooperative, Inc. acted immediately to mitigate and/or correct the violations; (7) The violation was mitigated in accordance with the approved Mitigation Plan and SERC Reliability Corporation has verified Sam Rayburn G&T Electric Cooperative, Inc.'s Certification of Completion; and (8) The actions taken by Sam Rayburn G&T Electric Cooperative, Inc. ensure that reliability is maintained.

Therefore, NERC believes that the proposed zero dollar penalty is appropriate and consistent with NERC's goal to ensure reliability of the bulk power system.

Pursuant to Order No. 693, the penalty will be effective upon expiration of the thirty (30) day period following the filing of this Notice of Penalty with FERC, or, if FERC decides to review the penalty, upon final determination by FERC.

The Record of the Proceeding[8]

The record of the proceeding includes the following documents and material, which are set forth in the Attachments below:

a) Sam Rayburn G&T Electric Cooperative, Inc.'s Self-Certifications;

b) SERC Reliability Corporation Determination Summary;

c) Notice of Alleged Violation and Penalty or Sanction;

d) Notice of Confirmed Violation and Penalty or Sanction. Sam Rayburn G&T Electric Cooperative, Inc. did not submit a response thereto;

e) Mitigation Plans designated as MIT-07-0194, MIT-07-0241 and MIT-07-0238 and request for extension of completion date for MIT-07-0238;

[8] *See* 18 C.F.R § 39.7(d)(5).

f) Sam Rayburn G&T Electric Cooperative, Inc.'s certification of completion of the Mitigation Plans;

g) SERC Reliability Corporation's statement of verification that the Mitigation Plans have been completed; and

h) NERC BOTCC Decision.

A Form of Notice Suitable for Publication[9]

A copy of a notice suitable for publication is included in Attachment i.

Notices and Communications

Notices and communications with respect to this filing may be addressed to the following:

Rick Sergel
President and Chief Executive Officer
David N. Cook*
Vice President and General Counsel
North American Electric Reliability Corporation
116-390 Village Boulevard
Princeton, NJ 08540-5721
(609) 452-8060
(609) 452-9550 – facsimile
david.cook@nerc.net

Rebecca J. Michael*
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Suite 990
Washington, D.C. 20005-3801
(202) 393-3998
(202) 393-3955 – facsimile
rebecca.michael@nerc.net

*Persons to be included on the Commission's service list are indicated with an asterisk.

[9] *See* 18 C.F.R § 39.7(d)(6).

Conclusion

NERC respectfully requests that the Commission accept this Notice of Penalty as compliant with its rules, regulations and orders.

Respectfully submitted,

/s/ Rebecca J. Michael

Rick Sergel
President and Chief Executive Officer
David N. Cook
Vice President and General Counsel
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116-390 Village Boulevard
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(202) 393-3955 – facsimile
rebecca.michael@nerc.net.

cc: Sam Rayburn G&T Electric Cooperative, Inc.
SERC Reliability Corporation

Attachment(s)

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Attachment a

Sam Rayburn G&T Electric Cooperative, Inc.'s Self-Certifications

PRC-005-1-T LOC - Transmission and Generation Protection System Maintenance and Testing - 2007

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Attachments (0)

Reference Document: Maintenance and Testing SERC Supplement

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*Required Fields

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Technical Contact

* John Pasierb (john.pasierb@gdsassociates.com) |

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As an officer of **Sam Rayburn G&T Electric Cooperative Inc.**,

I confirm the following:

Section A:

○ 1. A Transmission Protection System maintenance and testing program is documented and implemented in accordance with NERC Reliability Standard PRC-005-1 (Transmission and Generation Protection System Maintenance and Testing).

Documentation of the program and its implementation will be made available to SERC on request (30 calendar days).

◉ 2. Documentation demonstrating implementation of a Transmission Protection System maintenance and testing program is incomplete and/or implementation is not on schedule **(check all that apply)**:

- ☐ Transmission Protection System identification (Includes: relays, instrument transformers, communication systems, and batteries)
- ☑ Documentation of maintenance and testing intervals and their basis.
- ☑ Summary of testing procedure
- ☐ Schedule for system maintenance and testing.
- ☑ Implementation of the Transmission Protection System maintenance and testing program is not on schedule. **Sam Rayburn G&T Electric Cooperative Inc.** expects to be on schedule by 10/31/2007

○ 3. The NERC Reliability Standard PRC-005-1 does not apply because **Sam Rayburn G&T Electric Cooperative Inc.** does not own a Transmission Protection System.

○ 4. The NERC Reliability Standard PRC-005-1 applies to **Sam Rayburn G&T Electric Cooperative Inc.** and our data has been coordinated with and is covered by the submittal(s) of

	Master Account	First Name	Last Name	Telephone	Email

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Section B:

This submittal also covers:

	Master Account	First Name	Last Name	Telephone	Email

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FAC-008-1-T LOC - Facility Ratings Methodology - 2007

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Technical Contact

* William Bateman (bill.bateman@gdsassociates.cc |

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As an officer of **Sam Rayburn G&T Electric Cooperative Inc.**,

I confirm the following:

Section A:

◉ 1. The NERC Reliability Standard FAC-008-1 (Facility Ratings Methodology) applies to **Sam Rayburn G&T Electric Cooperative Inc.** and in accordance with NERC Reliability Standard FAC-008-1, **Sam Rayburn G&T Electric Cooperative Inc.** has on file or is able to readily provide, documentation of its methodology for developing Facility Ratings of its solely and jointly owned Facilities. The documented methodology: (check all that apply):

- ☐ Includes a statement that the Facility Rating shall equal the most limiting applicable Equipment Rating of the individual equipment that comprises the Facility.
- ☐ Includes the method by which, as a minimum, both Normal and Emergency Ratings are determined for generators, transmission conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices, as applicable.
- ☑ Includes consideration of ratings provided by equipment manufacturers, design criteria, ambient conditions, operating limitations, and other assumptions.
- ☑ Is available for inspection and technical review by **Sam Rayburn G&T Electric Cooperative Inc.'s** associated Reliability Coordinator(s), Planning Authority(ies), Transmission Planner(s), and Transmission Operator(s) within 15 days of receipt of their request.

a. ○ **Sam Rayburn G&T Electric Cooperative Inc.** has received written comments on its Facility Ratings Methodology from its associated Reliability Coordinator(s), Planning Authority(ies), Transmission Planner(s), and/or Transmission Operator(s)

- ☐ **Sam Rayburn G&T Electric Cooperative Inc.** has provided written response(s) to all commenting entities within 45 days of receipt of the comments.

b. ◉ **Sam Rayburn G&T Electric Cooperative Inc.** has not received any written comments on its Facility Ratings Methodology.

○ 2. The NERC Reliability Standard FAC-008-1 (Facility Ratings Methodology) applies to **Sam Rayburn G&T Electric Cooperative Inc.**, however **Sam Rayburn G&T Electric Cooperative Inc.** does not have on file or is not able to readily provide, documentation of its methodology for developing Facility Ratings of its solely and jointly owned Facilities that meet the requirements of FAC-008-1.

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3. The NERC Reliability Standard FAC-008-1 does not apply to **Sam Rayburn G&T Electric Cooperative Inc.** because:

No further submittals are required in addition to this Letter of Certification.

4. The NERC Reliability Standard FAC-008-1 applies to **Sam Rayburn G&T Electric Cooperative Inc.** and our data has been coordinated with and is covered by the submittal(s) of

	Master Account	First Name	Last Name	Telephone	Email

Section B:

1. This submittal also covers:

	Master Account	First Name	Last Name	Telephone	Email

Note: For companies not listed, please contact

2. Sam Rayburn G&T Electric Cooperative Inc. is registered as both a Transmission Owner (TO) and Generation Owner (GO).

This form covers all facilities owned by Sam Rayburn G&T Electric Cooperative Inc.. Submittal of FAC-008-1-G LOC **is not required**.

This form does **not** cover the generation facilities owned by Sam Rayburn G&T Electric Cooperative Inc.. Submittal of FAC-008-1-G LOC **is required**.

Additional Comments:

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SERC Member Portal

Sam Rayburn G&T Electric Cooperative Inc.

Logged in as:
John Wolfmeyer
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- Committees
- Compliance
  - Planning Forms
  - Operating Forms
  - Cyber Security Forms
  - Vegetation Forms
  - Historical Forms
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  - Certification Statements
  - Reports
- Assessments
- Mitigation Plans
- Summer Assessment
- Winter Assessment
- EIA411 Transmission
- EIA411 Demand/Capacity
- Actual Demand/Energy
- EIA-860
- Annual Voting Rights
- Surveys
- Recommendations
- Meetings

CIP-001-1 Self Certification - Sabotage Reporting - 2007

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Technical Contact

* John Pasierb (john.pasierb@gdsassociates.com) |

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As an officer of **Sam Rayburn G&T Electric Cooperative Inc.**, I confirm the following:

Section A:
Requirement 1

◉ 1. The NERC Reliability Standard CIP-001-1 Requirement 1 applies to **Sam Rayburn G&T Electric Cooperative Inc.**. Select the button to the left of one of the statements below:

- ○ **Sam Rayburn G&T Electric Cooperative Inc.** has procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi-site sabotage affecting larger portions of the Interconnection.
- ◉ **Sam Rayburn G&T Electric Cooperative Inc. does not** have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi-site sabotage affecting larger portions of the Interconnection.
  Provide a detailed explanation why this was not accomplished.

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Sam Rayburn G&T Electric Cooperative Inc. has an Emergency Operations Plan in place and is in process of modifying this plan to comply with all the requirements of CIP-001-1.

2. The NERC Reliability Standard CIP-001-1 Requirement 1 **does not** apply to **Sam Rayburn G&T Electric Cooperative Inc.** because

Requirement 2

1. The NERC Reliability Standard CIP-001-1 Requirement 2 applies to **Sam Rayburn G&T Electric Cooperative Inc.**. Select the button to the left of one of the statements below:

   Sam Rayburn G&T Electric Cooperative Inc. has procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.

   Sam Rayburn G&T Electric Cooperative Inc. does not have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.
   Provide a detailed explanation why this was not accomplished.

   Sam Rayburn G&T Electric Cooperative Inc. has an Emergency Operations Plan in place and is in process of modifying this plan to comply with all the requirements of CIP-001-1.

2. The NERC Reliability Standard CIP-001-1 Requirement 2 **does not** apply to **Sam Rayburn G&T Electric Cooperative Inc.** because

Requirement 3

1. The NERC Reliability Standard CIP-001-1 Requirement 3 applies to **Sam Rayburn G&T Electric Cooperative Inc.**. Select the button to the left of one of the statements below:

   Sam Rayburn G&T Electric Cooperative Inc. provides its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events.

   Sam Rayburn G&T Electric Cooperative Inc. does not provide its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events.
   Provide a detailed explanation why this was not accomplished.

   Sam Rayburn G&T Electric Cooperative Inc. has an Emergency Operations Plan in place and is in process of modifying this plan to comply with all the requirements of CIP-001-1.

2. The NERC Reliability Standard CIP-001-1 Requirement 3 **does not** apply to **Sam Rayburn G&T Electric Cooperative Inc.** because

Requirement 4

1. The NERC Reliability Standard CIP-001-1 Requirement 4 applies to **Sam Rayburn G&T Electric Cooperative Inc.**. Select the button to the left of one of the statements below:

   - **Sam Rayburn G&T Electric Cooperative Inc.** has established communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials and has developed reporting procedures as appropriate to their circumstances.
   - **Sam Rayburn G&T Electric Cooperative Inc. has not** established communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials or **has not** developed reporting procedures as appropriate to their circumstances.
     Provide a detailed explanation why this was not accomplished.

     Sam Rayburn G&T Electric Cooperative Inc. has an Emergency Operations Plan in place and is in process of modifying this plan to comply with all the requirements of CIP-001-1.

2. The NERC Reliability Standard CIP-001-1 Requirement 4 **does not** apply to **Sam Rayburn G&T Electric Cooperative Inc.** because _____

Self Certification:

- I certify that **Sam Rayburn G&T Electric Cooperative Inc.** is in Full Compliance with the NERC Reliability Standard CIP-001-1.
- I certify that **Sam Rayburn G&T Electric Cooperative Inc.** is Non-Compliant Level Level 3 with the NERC Reliability Standard CIP-001-1 because

  Sam Rayburn G&T Electric Cooperative Inc. has not provided its operating personnel with sabotage response procedures or guidelines.

- I certify that the NERC Reliability Standard CIP-001-1 applies to **Sam Rayburn G&T Electric Cooperative Inc.** and our data has been coordinated with and is covered by the submittal(s) of:

	Master Account	First Name	Last Name	Telephone	Email

Section B:

1. This submittal also covers:

	Master Account	First Name	Last Name	Telephone	Email

Note: For companies not listed, please contact support@serc1.org

Additional Comments:

Sam Rayburn G&T Electric Cooperative Inc. anticipates modifications of the Emergency Operations Plan currently in place to full compliance by December 31, 2007.

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FOR PUBLIC RELEASE MAY 29, 2008

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment b

SERC Reliability Corporation Determination Summary

Determination Summary

SERC Tracking Num	07-169		
Standard	PRC-005-1		
Requirement	R1		
Method of Discovery	Self-Certification		
Date Issue Occured	6/18/2007	***Issue Reported to SERC***	9/1/2007
SPOC	John Wolfmeyer		
Registered Entity	Sam Rayburn G&T Electric Cooperative Inc.		
NERC Registry ID	NCR01307	***NERC Violation #***	SERC200700018
Sufficient Basis?	☑	***NAVAPS Date***	12/11/2007
VRF	High		
VSL	High		
Reliability Impact	*DIMI Transmission protection system hardware must be maintained to ensure their proper operation. However, this is primarily a documentation issue and has little, if any, impact on reliability.		
Text of Requirement	R1. Each Transmission Owner and any Distribution Provider that owns a transmission Protection System and each Generator Owner that owns a generation Protection System shall have a Protection System maintenance and testing program for Protection Systems that affect the reliability of the BES. The program shall include: R1.1. Maintenance and testing intervals and their basis. R1.2. Summary of maintenance and testing procedures.		
Factual Basis	The maintenance and testing program did not address the maintenance and testing intervals, and how they were developed. Additionally, the testing and maintenance program did not summarize the procedures utilized to test the relays and protective systems.		
Violation Summary	Entity is in violation of the standard because the protection system maintenance and testing program does not include the considerations required by R1		
Peer Reviewer	Mark Ladrow		
Peer Review Date	11/1/2007		
CEM	Ken Keels		
CEM Approval Date	11/19/2007		
CD	Tom Galloway		
CD Concur Date	11/23/2007		

Determination Summary

SERC Tracking Num	07-178		
Standard	FAC-008-1		
Requirement	R1		
Method of Discovery	Self-Certification		
Date Issue Occured	6/18/2007	***Issue Reported to SERC***	9/1/2007
SPOC	John Wolfmeyer		
Registered Entity	Sam Rayburn G&T Electric Cooperative Inc.		
NERC Registry ID	NCR01307	***NERC Violation #***	SERC200700024
Sufficient Basis?	☑	***NAVAPS Date***	12/11/2007
VRF	Lower		
VSL	Moderate		
Reliability Impact	*DIMI Minimal impact is anticipated. This appears to be a documentation issue and all related requirements have a Lower risk factor.		
Text of Requirement	R1. The Transmission Owner and Generator Owner shall each document its current methodology used for developing Facility Ratings (Facility Ratings Methodology) of its solely and jointly owned Facilities. The methodology shall include all of the following: R1.3. Consideration of the following: R1.3.1. Ratings provided by equipment manufacturers. R1.3.2. Design criteria (e.g., including applicable references to industry Rating practices such as manufacturer's warranty, IEEE, ANSI or other standards). R1.3.3. Ambient conditions. R1.3.4. Operating limitations. R1.3.5. Other assumptions. R2. The Transmission Owner and Generator Owner shall each make its Facility Ratings Methodology available for inspection and technical review by those Reliability Coordinators, Transmission Operators, Transmission Planners, and Planning Authorities that have responsibility for the area in which the associated Facilities are located, within 15 business days of receipt of a request.		
Factual Basis	Facilities Rating document does not specifically state the most limiting equipment rating of the Facility determines the Facility Rating. Additionally, the methodology for Normal and Emergency ratings of facilities is not defined within the Facilities Rating document.		
Violation Summary	Entity is in violation of R1 by not including all of the considerations in the standard. Specifically, the Facilities Rating document does not specifically state the most limiting equipment rating of the Facility determines the Facility Rating. Additionally, the methodology for Normal and Emergency ratings of facilities is not defined within the Facilities Rating document. This is a documentation issue and is considered to be a level 1 non-compliance for each missing element. Therefor a moderate VSL was chosen.		
Peer Reviewer	Mark Ladrow		
Peer Review Date	12/5/2007		
CEM	Ken Keels		
CEM Approval Date	12/10/2007		

Determination Summary

CD	Tom Galloway
CD Concur Date	12/10/2007

Determination Summary

SERC Tracking Num	07-198		
Standard	CIP-001-1		
Requirement	R1, R2, R3, R4		
Method of Discovery	Self-Certification		
Date Issue Occured	6/18/2007	***Issue Reported to SERC***	10/1/2007
SPOC	John Wolfmeyer		
Registered Entity	Sam Rayburn G&T Electric Cooperative Inc.		
NERC Registry ID	NCR01307	***NERC Violation #***	SERC200700027, 28, 29, 30
Sufficient Basis?	☑	***NAVAPS Date***	12/11/2007
VRF	Medium		
VSL	High		
Reliability Impact	Minimal. In the unlikely event of a sabotage event on at this entity, it is doubtful that it would pose a significant threat to the reliability of the rest of the BPS. The entity has a program in place, but it does not meet the requirements of the standard.		
Text of Requirement	R1. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi-site sabotage affecting larger portions of the Interconnection. R2. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection. R3. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall provide its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events. R4. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials and develop reporting procedures as appropriate to their circumstances.		
Factual Basis	Entity states that its sabotage reporting procedure is lacking aspects of all four requirements of the standard.		
Violation Summary	Entity states that its sabotage reporting procedure is lacking aspects of all four requirements of the standard and is therefore, in violation of R1, R2, R3, and R4.		
Peer Reviewer	Mark Ladrow		
Peer Review Date	11/1/2007		
CEM	Ken Keels		
CEM Approval Date	11/19/2007		
CD	Tom Galloway		
CD Concur Date	11/23/2007		

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment c

Notice of Alleged Violation and Penalty or Sanction

Thomas J. Galloway, Compliance Director
SERC Reliability Corporation
2815 Coliseum Centre Drive, Suite 500 | Charlotte, NC 28217
704.357.7372 | Fax 704.357.7914 | www.serc1.org

January 22, 2008

VIA EMAIL & REGULAR MAIL

Sam Rayburn G&T Electric Cooperative, Inc.
William Bateman
2905 Westward Drive
Nacogdoches, Texas 75961
bill.bateman@gdsassociates.com

Re: Notice of Alleged Violation and Proposed Penalty or Sanction

NERC Violation Tracking Identification Number(s) SERC200700018, SERC200700024, and SERC 200700027 through SERC20070030

Please be advised that the enclosed letter replaces the Notice of Alleged Violation and Proposed Penalty or Sanction letter which was previously dated December 11, 2007. The only change which has been made was within the Reference Line above. The original letter dated December 11, 2007 indicated the incorrect NERC Violation Tracking Identification Number(s). All other content remains the same. *This is not a new violation and no new response is required.*

Please accept our apology for any inconvenience this may have caused.

Sincerely,

Ken B. Keels, Jr.
SERC Manager of Compliance Enforcement

Charles White
SERC Chairman
South Carolina Electric & Gas

William Ball
SERC Vice-Chairman
Southern Company Services, Inc.

Terry Blackwell
SERC Secretary-Treasurer
South Carolina Public Service Authority

Thomas J. Galloway, Compliance Director
SERC Reliability Corporation
2815 Coliseum Centre Drive, Suite 500 | Charlotte, NC 28217
704.357.7372 | Fax 704.357.7914 | www.serc1.org

Notice of Alleged Violation and Proposed Penalty or Sanction

VIA EMAIL AND CERTIFIED MAIL

December 11, 2007

Sam Rayburn G&T Electric Cooperative, Inc.
William Bateman
2905 Westward Drive
Nacogdoches, Texas 75961
bill.bateman@gdsassociates.com

Re: Notice of Alleged Violation and Proposed Penalty or Sanction

NERC Violation Tracking Identification Number(s) SERC200700018, SERC200700024, and SERC 200700027 through SERC20070030

In accordance with the NERC Rules of Procedure including Appendix 4C thereto, which contains the NERC Compliance Monitoring and Enforcement Program (CMEP), SERC Reliability Corporation (SERC) hereby notifies Sam Rayburn G&T Electric Cooperative, Inc. (Sam Rayburn) of an Alleged Violation of the NERC Reliability Standards and the Proposed Penalty or Sanction. In support hereof, SERC states as follows:

On June 18, 2007, Sam Rayburn was registered on the NERC Compliance Registry for the function(s) listed in Table A. As discussed herein, SERC has determined to charge Sam Rayburn with a violation based upon information available to it that Sam Rayburn did not comply or was not in compliance with the NERC Reliability Standards listed in Table A. However, as discussed further below, SERC has determined to exercise its discretion to assess no penalty against Sam Rayburn for these violations at this time, unless Sam Rayburn fails to complete and implement its Mitigation Plan as discussed in greater detail below.

Reliability Standard(s) and Requirement(s) Allegedly Violated and Discovery Details

The facts and evidence of each Alleged Violation, the date(s) when each Alleged Violation occurred, the date(s) each Alleged Violation was discovered and the discovery method are also listed in Table A.

Charles White
SERC Chairman
South Carolina Electric & Gas

William Ball
SERC Vice-Chairman
Southern Company Services, Inc.

Terry Blackwell
SERC Secretary-Treasurer
South Carolina Public Service Authority

Proposed Penalty or Sanction

As authorized and in accordance with the orders of the Federal Energy Regulatory Commission (FERC), SERC has elected to exercise its discretion and will not assess a penalty on Sam Rayburn at this time for these Alleged Violations. If, however, Sam Rayburn fails to complete all or part of the approved mitigation plan for any of the Alleged Violations in accordance with the terms and time established by the mitigation plan, SERC may take action to assess and collect a penalty from Sam Rayburn, which penalty will be determined pursuant to the NERC Rules of Procedure and the NERC Sanction Guidelines considering the period beginning on June 18, 2007 until the violation is fully mitigated. The terms of the mitigation plan and time line for completion may be modified only upon express written approval by SERC and NERC.

Procedures for Response by Registered Entity to this Notice

As required by Section 5.1 of the NERC CMEP, within thirty (30) days of the date of this notification, Sam Rayburn must notify SERC in writing of its decision to elect one of the following options:

1. Sam Rayburn agrees with or does not contest the Alleged Violation(s) and proposed penalty or sanction, and agrees to submit and implement a mitigation plan to correct the violation and its underlying causes;

2. Sam Rayburn agrees to or does not contest the Alleged Violation(s) and agrees to submit and implement a mitigation plan to eliminate the violation and its underlying causes, but contests the proposed penalty or sanction; or

3. Sam Rayburn contests both the Alleged Violation(s) and the proposed penalty or sanction for the Alleged Violation(s).

With respect to election options 1-3, Sam Rayburn may submit a response in accordance with CMEP Section 5.2. Sam Rayburn's statement must be on company letterhead and must include the name, title, and signature of an officer of Sam Rayburn. The mitigation plan and time line for completion must be accepted by both the SERC and NERC.

Upon acceptance of the Alleged Violation and proposed penalty or sanction, the final notice of the violation, penalty and sanction will then be processed and issued to Sam Rayburn.

If Sam Rayburn does not contest or does not respond to the notice of violation within thirty (30) days, it shall be deemed to have accepted SERC's preliminary determination of violation and proposed penalty or sanction (as applicable), in which case SERC shall issue to Sam Rayburn and NERC a report of Confirmed Violation. After two (2) business days, NERC will provide a Notice of Penalty, Sanction, or Other Enforcement Action to FERC.

If Sam Rayburn contests the Alleged Violation or the proposed sanction, Sam Rayburn shall submit to SERC a response explaining its position, signed by an officer or equivalent, together with any supporting information and documents within thirty (30) days. Sam Rayburn shall provide a primary contact name who will be the responsible party to respond to questions regarding the above Alleged Violation(s). SERC shall schedule a conference with Sam Rayburn within ten (10) business days after receipt of the response. If SERC and Sam Rayburn are unable to resolve all issues within forty (40) days after Sam Rayburn's response, Sam Rayburn may request a hearing. If no hearing request is made, the violation will become a Confirmed Violation when filed by NERC with FERC.

Attachment 2 to the CMEP governs the hearing process. A Registered Entity may appeal the hearing body's decision in accordance with the CMEP and the NERC Rules of Procedure.

CMEP Section 5.4 governs the settlement process and provides that settlement negotiations may occur at any time including prior to the issuance of a notice of Alleged Violation and Penalty or Sanction until a Notice of Penalty, Sanction, or Other Enforcement Action is filed with FERC.

Mitigation Plan Procedures and Requirements

CMEP Section 6.0 sets forth the provisions regarding the submittal of a mitigation plan. A Registered Entity found to be in violation of a Reliability Standard shall file with the applicable Regional Entity (i) a proposed Mitigation Plan to correct the violation, or (ii) a description of how the violation has been mitigated, and any requests for extensions of Mitigation Plans or a report of completed mitigation. CMEP Section 6.2 requires that a Mitigation Plan include the following information:

(1) The Registered Entity's point of contact for the Mitigation Plan, who shall be a person (i) responsible for filing the Mitigation Plan, (ii) technically knowledgeable regarding the Mitigation Plan, and (iii) authorized and competent to respond to questions regarding the status of the Mitigation Plan. This person may be the Registered Entity's point of contact described in Section 2.0.

(2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.

(3) The cause of the Alleged or Confirmed Violation(s).

(4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).

(5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed Violation(s).

(6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.

(7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.

(8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined for not completing work associated with accepted milestones.

(9) Any other information deemed necessary or appropriate.

The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self-Certification or Self Reporting submittals.

CMEP Section 6.4 provides that a Mitigation Plan may be submitted at any time but shall have been submitted by the Registered Entity within thirty (30) days after being served the notice of Alleged Violation and Penalty or Sanction, if the Registered Entity does not contest the violation and penalty or sanction. If the Registered Entity disputes the notice of Alleged Violation or penalty or sanction, the Registered Entity shall submit its Mitigation Plan within ten (10) business days following issuance of the written decision of the hearing body, unless the Registered Entity elects to appeal the hearing body's determination to NERC. The Registered Entity may choose to submit a Mitigation Plan while it contests an Alleged Violation or penalty or sanction; such submission shall not be deemed an admission of a violation or the appropriateness of a penalty or sanction. If the Registered Entity has not yet submitted a

Mitigation Plan, or the Registered Entity submits a Mitigation Plan but it is rejected by the Compliance Enforcement Agency or the hearing body in accordance with section 6.5, any subsequent violations of the Reliability Standard identified by the Compliance Enforcement Authority before the hearing body renders its decision will not be held in abeyance and will be considered as repeat violations of the Reliability Standard.

Mitigation Plans must be submitted using the Mitigation Plan Submittal Form template located in the Compliance Area of the SERC web site.

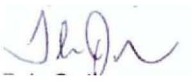
Mitigation Plan and Implementation Status

SERC Compliance Enforcement has received a proposed mitigation plan to correct the alleged violations of PRC-005-1. That mitigation plan was approved by the SERC Board Compliance committee on November 15, 2007 and remains pending before NERC for its approval. SERC Compliance Enforcement has also received proposed mitigation plans to correct the alleged violations of CIP-001-1 and FAC-008-1. They will be reviewed by the SERC Compliance Staff and submitted to the Board Compliance Committee for approval. In accordance with the NERC Rules of Procedure, Appendix 4C, and as discussed in the Proposed Penalty or Sanction section above, no penalties will be assessed by SERC unless the mitigation is not successfully completed in accordance with the timetable set forth in the mitigation plans or an agreed upon extension has been granted.

Conclusion

Please direct any questions in response to this Notice of Alleged Violation and Proposed Penalty or Sanction to the undersigned. In your reply correspondence to this notice, please provide the name and contact information of Sam Rayburn's representative who is authorized to respond to questions regarding the above-listed Alleged Violation and who is responsible for providing the required Mitigation Plan. Please also provide the relevant NERC Violation Tracking Identification Number(s) in any correspondence.

Respectfully submitted,



Thomas J. Galloway
SERC Director of Compliance

cc: G. Cauley, SERC President and CEO
T. Kucey, NERC Manager of Enforcement and Mitigation
K. Keels, SERC Manager of Compliance Enforcement
SERC Tracking File

Attachment(s): Table A

Table A
Sam Rayburn G&T Electric Cooperative, Inc.
December 11, 2007

Registered on the NERC Compliance Registry as:
Transmission Owner, Generator Owner, Load Serving Entity
(NERC Compliance Registry ID **NCR01307**)

Reliability Standard(s) Allegedly Violated and Reference #'s	Requirement(s) Allegedly Violated	Discovery Method of Alleged Violation	Date Alleged Violation Occurred/ Discovered	Facts and Evidence of Alleged Violation
CIP-001-1 **Violation #:** SERC200700027 through SERC200700030 **SERC Tracking #:** 07- 198	R1, R2, R3, R4	Self-certification	**Occurred:** June 18, 2007 **Discovered:** 8/31/2007	Entity's Emergency Operations Plan does not address recognition of sabotage events, procedures for recognizing a concerted attack on the Interconnection, communicating sabotage events to the Interconnection, or contacts with Federal Law Enforcement officials dealing with sabotage and employee training in recognition of sabotage has not occurred.
FAC-008-1 **Violation #:** SERC200700024 **SERC Tracking #:** 07-178	R1	Self-certification	**Occurred:** June 18, 2007 **Discovered:** 10/1/2007	The Facilities Rating document does not specifically state the most limiting equipment rating of the Facility determines the Facility Rating. Additionally, the methodology for Normal and Emergency ratings of facilities is not defined within the Facilities Rating document.
PRC-005-1 **NERC Violation #:** SERC200700018 **SERC Tracking #:** 07-169	R1	Self-certification	**Occurred:** June 18, 2007 **Discovered:** 9/1/2007	The maintenance and testing program did not address the maintenance and testing intervals, and how they were developed. Additionally, the testing and maintenance program did not summarize the procedures utilized to test the relays and protective systems.

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment d

Notice of Confirmed Violation and Penalty or Sanction

Thomas J. Galloway, Director of Compliance
SERC Reliability Corporation
2815 Coliseum Centre Drive | Suite 500
Charlotte, NC 28217
704.357.7372 | Fax 704.357.7914 | www.serc1.org

March 26, 2008 **VIA EMAIL AND CERTIFIED MAIL**

Sam Rayburn G&T Electric Cooperative, Inc.
Mr. Edd Hargett
P.O. Box 631623
2905 Westward Drive
Nacogdoches, Texas 75961
Eddh@gtpower.com

Re: Regional Entity Notice of Confirmed Violation and Proposed Penalty or Sanction Regarding Sam Rayburn G&T Electric Cooperative, Inc.
NERC Violation Tracking Identification Numbers: SERC200700018, SERC200700024, SERC200700027, SERC200700028, SERC200700029, and SERC200700030

Dear Mr. Hargett:

SERC Reliability Corporation (SERC) hereby provides this Regional Entity Notice of Confirmed Violation and Proposed Penalty or Sanction regarding Sam Rayburn G&T Electric Cooperative, Inc. (SRG&T),[1] in accordance with the Federal Energy Regulatory Commission's (Commission or FERC) rules, regulations and orders, and the North American Electric Reliability Corporation (NERC) Rules of Procedure including Appendix 4C (NERC Compliance Monitoring and Enforcement Program (CMEP)).[2]

SERC is issuing this Regional Entity Notice of Confirmed Violation and Proposed Penalty or Sanction, because SRG&T did not respond to the previously issued Notice of Alleged Violation and Proposed Penalty or Sanction within thirty (30) days of its receipt. Accordingly, the violations identified by the above NERC Violation Tracking Number(s) and listed in Table 1 below are Confirmed Violations, as that term is defined in the NERC Rules of Procedure and the CMEP.

In accordance with Section 39.7 of the Commission's regulations, 18 C.F.R. § 39.7 (2007), SERC provides the following table identifying each Reliability Standard violated by SRG&T and including a statement by SERC setting forth the findings of fact with respect to the act or practice resulting in the violation of each Reliability Standard. (*See* Table 1.)

NERC Process

SERC is providing a copy of this Regional Entity Notice of Confirmed Violation and Proposed Penalty or Sanction to NERC for its review and consideration. Upon acceptance by the NERC Board of Trustees Compliance Committee, in its current form or as modified, NERC will provide the Notice of Proposed Penalty or Sanction to FERC, with a copy to SRG&T and SERC. Following NERC action, FERC may act to accept, reject or modify the findings and/or penalties or sanctions set forth herein.

[1] *See* 18 C.F.R § 39.7(d)(1).
[2] *See* 18 C.F.R § 39.7(c)(2).

Charles White
SERC Chairman
South Carolina Electric & Gas

William Ball
SERC Vice-Chairman
Southern Company Services, Inc.

Terry Blackwell
SERC Secretary-Treasurer
South Carolina Public Service Authority

Table 1
Description of Confirmed Violation

Sam Rayburn G&T Electric Cooperative, Inc.

Registered on the NERC Compliance Registry as: Transmission Owner, Load-Serving Entity

NERC Compliance Registry ID #: NCR01307

NERC Violation ID#:SERC200700018

SERC Tracking #: 2007-169

Reliability Standard Violated [3]	PRC-005-1
Requirement Violated [4]	R1
Date of Discovery	September 1, 2007
Discovery Method	Self-Certification
Date or Period of Violation	June 18, 2007

Facts and Evidence of the Act or Practice Resulting in the Violation [5]
Entity's program does not include maintenance cycles or their basis for all of the components specified in the standard. This is a violation of R1.

Proposed Penalty or Sanction
Zero

NERC Violation ID#: SERC200700024

SERC Tracking #: 2007-178

Reliability Standard Violated	FAC-008-1
Requirement Violated	R1
Date of Discovery	September 1, 2007
Discovery Method	Self-certification
Date or Period of Violation	June 18, 2007

Facts and Evidence of the Act or Practice Resulting in the Violation
The Facility Rating Methodology document does not specifically state that the most limiting equipment rating of the Facility determines the Facility Rating. Additionally, the methodology for Normal and Emergency ratings of facilities is not defined within the Facility Rating Methodology document.

Proposed Penalty or Sanction
Zero

[3] *See* 18 C.F.R § 39.7(d)(2).
[4] *See* 18 C.F.R § 39.7(d)(2).
[5] *See* 18 C.F.R § 39.7(d)(3).

NERC Violation ID#: SERC200700027, SERC200700028, SERC200700029, and SERC200700030

SERC Tracking #: 2007-198

Reliability Standard Violated	CIP-001-1
Requirement Violated	R1, R2, R3, and R4
Date of Discovery	October 1, 2007
Discovery Method	Self-certification
Date or Period of Violation	June 18, 2007

Facts and Evidence of the Act or Practice Resulting in the Violation
Entity's Emergency Operations Plan does not address recognition of sabotage procedures for recognizing a concerted attack on the Interconnection, communicating sabotage events to the Interconnection, or contacts with Federal law enforcement officials dealing with sabotage and employee training in recognition of sabotage has not occurred.
Proposed Penalty or Sanction
Zero

Statement Describing Any Proposed Penalty or Sanction Imposed [6]

SERC has determined to exercise its discretion to assess no penalty, sanction or other enforcement action against SRG&T for the violations listed in Table 1 at this time, unless SRG&T fails to complete and implement its Mitigation Plan in accordance with the terms of the Mitigation Plan.

This proposed penalty or sanction is subject to review and possible revision by NERC and FERC. NERC will include its determination of the proposed penalty or sanction in a Notice of Proposed Penalty or Sanction to be filed with FERC.

Other Matters of Relevance [7]

SRG&T's Mitigation Plans listed in Table 1 were accepted by SERC on November 15, 2007, December 20, 2007, and December 20, 2007 and by NERC on December 11, 2007, February 11, 2008, and February 11, 2008 respectively. The Mitigation Plans for the violations listed in Table 1 were submitted as non-public information to FERC in accordance with applicable statutes, regulations and FERC orders.

In accordance with the NERC Rules of Procedure, Appendix 4C, no additional proposed penalties or sanctions will be assessed by SERC unless the mitigation is not successfully completed in accordance with the timetable set forth in the Mitigation Plan or an agreed upon extension. An extension of time for completion of the Mitigation Plan requires prior express written approval by SERC and NERC as set forth in the CMEP.

[6] *See* 18 C.F.R § 39.7(d)(4).
[7] *See* 18 C.F.R § 39.7(d)(7)./

Statement Provided by the Registered Entity as set forth in CMEP Sections 5.6 and 8.0

In accordance with CMEP Section 8.0, the Regional Entity must report to NERC and the affected Registered Entity all Confirmed Violations of Reliability Standards including all penalties, sanctions, Mitigation Plans and schedules, and settlements, within ten (10) business days of each determination. SERC hereby provides notice that SRG&T may provide a statement to NERC, with a copy to SERC, within five (5) business days after the date of this Regional Entity Notice of Confirmed Violation and Proposed Penalty or Sanction, to accompany the report when posted by NERC. SRG&T's statement may be the same statement provided by SRG&T in response to the Notice of Alleged Violation and Proposed Penalty or Sanction. SRG&T's statement must be on SRG&T letterhead and must include the name, title, and signature of an officer, employee, attorney or other authorized representative of SRG&T.

NERC will publicly post each report of a Confirmed Violation, together with any statement submitted by SRG&T, no sooner than five (5) business days after the report is provided by SERC to NERC and SRG&T. NERC will include, with the Notice of Penalty filed with FERC, the statement provided by SRG&T.

SERC Tracking No. 07-169
NERC Violation ID No. SERC200700018

Confirmation Record Documents	Document Title	Date
Compliance Monitoring Document Identifying Possible Violation	Self-Certification	8/31/07
Compliance Enforcement Staff Determination of Facts and Evidence Supporting Violation	Determination Summary	11/23/07
Notice of Violation and Proposed Penalty or Sanction	Notice of Alleged Violation and Proposed Penalty or Sanction	12/11/07
Entity's Response to Notice of Violation	None Received	
Entity's Statement in Response to Notice of Violation	None Received	
Remedial Action Directive	Not Applicable	
Entity's Notice Contesting Remedial Action Directive	Not Applicable	
Entity's Request for Hearing	Not Applicable	
SERC Board Compliance Committee (Hearing Body) Final Order	Not Applicable	
Notice of Proposed Penalty or Sanction	Not Applicable	
Clerk's Notice Transmitting Final Order	Not Applicable	

Entity's Appeal to NERC	Not Applicable
NERC Final Determination on Entity's Appeal Request	Not Applicable

SERC Tracking No. 07-178
NERC Violation ID No. SERC200700024

Confirmation Record Documents	**Document Title**	**Date**
Compliance Monitoring Document Identifying Possible Violation	Self-Certification	8/31/07
Compliance Enforcement Staff Determination of Facts and Evidence Supporting Violation	Determination Summary	12/10/07
Notice of Violation and Proposed Penalty or Sanction	Notice of Alleged Violation and Proposed Penalty or Sanction	12/11/07
Entity's Response to Notice of Violation	None Received	
Entity's Statement in Response to Notice of Violation	None Received	
Remedial Action Directive	Not Applicable	
Entity's Notice Contesting Remedial Action Directive	Not Applicable	
Entity's Request for Hearing	Not Applicable	
SERC Board Compliance Committee (Hearing Body) Final Order	Not Applicable	
Notice of Proposed Penalty or Sanction	Not Applicable	
Clerk's Notice Transmitting Final Order	Not Applicable	
Entity's Appeal to NERC	Not Applicable	
NERC Final Determination on Entity's Appeal Request	Not Applicable	

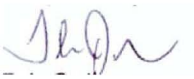
SERC Tracking No. 07-198
NERC Violation ID No. SERC200700027; SERC200700028; SERC200700029; SERC200700030

Confirmation Record Documents	Document Title	Date
Compliance Monitoring Document Identifying Possible Violation	Self-Certification	10/1/07
Compliance Enforcement Staff Determination of Facts and Evidence Supporting Violation	Determination Summary	11/23/07
Notice of Violation and Proposed Penalty or Sanction	Notice of Alleged Violation and Proposed Penalty or Sanction	12/11/07
Entity's Response to Notice of Violation	None Received	
Entity's Statement in Response to Notice of Violation	None Received	
Remedial Action Directive	Not Applicable	
Entity's Notice Contesting Remedial Action Directive	Not Applicable	
Entity's Request for Hearing	Not Applicable	
SERC Board Compliance Committee (Hearing Body) Final Order	Not Applicable	
Notice of Proposed Penalty or Sanction	Not Applicable	
Clerk's Notice Transmitting Final Order	Not Applicable	
Entity's Appeal to NERC	Not Applicable	
NERC Final Determination on Entity's Appeal Request	Not Applicable	

Conclusion

Any questions regarding this Regional Entity Notice of Confirmed Violation and Proposed Penalty or Sanction issued by SERC should be directed to the undersigned.

Respectfully submitted,



Thomas J. Galloway
SERC Director of Compliance

cc: Gerry Cauley, SERC President and CEO
David Hilt, NERC Vice President and Director of Compliance
Tim Kucey, NERC Manager of Enforcement and Mitigation
Ken Keels, SERC Manager of Compliance Enforcement
SERC Tracking File

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment e

Mitigation Plans designated as MIT-07-0194, MIT-07-0241 and MIT-07-0238 and request for extension of completion date for MIT-07-0238

SAM RAYBURN G & T
ELECTRIC COOPERATIVE, INC.

P.O. Box 631623 • Nacogdoches, Texas 75963-1623 • 936/560-9532 • FAX 936/560-9215

Mitigation Plan Submission Form

SERC Reliability Corporation
Violation Mitigation Plan Submittal Form
(Form Revised 8-28-07)

Confirmation of the violation does not have to be received by the registered entity before a mitigation plan may be submitted, nor does the entity waive the right to contest the notice of violation after it has been received.

Name of registered entity submitting this mitigation plan:
Sam Rayburn G&T Electric Cooperative, Inc.

Date of Submission:
October 17, 2007

Name of technical contact (submitter):
John J. Pasierb

Contact Information of the submitter:
john.pasierb@gdsassociates.com
(770) 425-8100
Is this mitigation plan submitted to cover the violation of other entities? If so, whom does it cover? No.

Which reliability standard was violated? PRC-005-1

Which specific requirement of the above standard was violated? R1.1, R1.2

State the cause of the violation(s). Describe why the entity is/was non-compliant with the requirement cited above:
The maintenance and testing program did not address the maintenance and testing intervals, and how they were developed. Additionally, the testing and maintenance program did not summarize the procedures utilized to test the relays and protective systems.

Provide a description of the action plan the entity will use to mitigate the violation including milestone schedule. Note: Milestones should not be more than three months apart. Extend the table below, if necessary.
A modified testing and maintenance plan was developed by SRG&T for implementation on the SRG&T owned and operated protective relays and equipment. This modified

program addresses the time between maintenance and testing, how the time frame was developed, utilization of manufacturer and industry standards in development of testing periods, a listing of all electrical and mechanical tests and maintenance performed on the protective equipment, and a listing of relays to be tested and past test results. Additionally, the program now includes ancillary equipment necessary to the proper operation of protective devices such as batteries.

Milestone Activity	Target Completion Date
Develop modified testing program	10/5/07
Review process with impacted members	11/15/07
Acceptance by SRG&T Management and members	12/31/07

What is the date by which this mitigation plan will be fully implemented and the alleged or confirmed violation(s) corrected? Note: additional sanctions or penalties may be associated with failure to complete the plan on schedule. 12/31/07

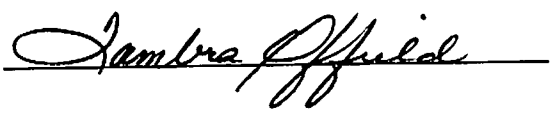
Provide a description of actions taken to prevent a recurrence of this violation:

Activity	Target Completion Date
Modified testing plan developed and processes in place to review and update plan as necessary	10/5/07
Implementation of records management system to track testing dates and store historical data	6/1/08

Describe the anticipated impact on the reliability of the Bulk Electric System resulting from the violation and while the mitigation plan is being implemented.
There is no impact as testing has been performed; however, documentation required by the NERC Standard and SERC Supplement had not been completed at the time of filing.
Is there any other information related to this violation and/or mitigation plan that you deem necessary or appropriate to provide?
The modified plan has been developed and is in the review stages. Implementation of the plan is on schedule as provided for in the mitigation plan above. The relays pertinent to the BES have been tested, administrative documentation will be improved with a records management system scheduled for implementation by year's end.

Provide the name, title, and signature, and date of signature of an authorized executive signatory

Name: Tambra Offield
Title: Office Manager
Date: October 17, 2007

Signature 

Mitigation Plan Submittal Form

Date this Mitigation Plan is being submitted: November 12, 2007

If this Mitigation Plan has already been completed:

- Check this box ☐ and
- Provide the Date of Completion of the Mitigation Plan:

Section A: Compliance Notices

- Section 6.2 of the CMEP[1] sets forth the information that must be included in a Mitigation Plan. The Mitigation Plan must include:

(1) The Registered Entity's point of contact for the Mitigation Plan, who shall be a person (i) responsible for filing the Mitigation Plan, (ii) technically knowledgeable regarding the Mitigation Plan, and (iii) authorized and competent to respond to questions regarding the status of the Mitigation Plan. This person may be the Registered Entity's point of contact described in Section 2.0.

(2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.

(3) The cause of the Alleged or Confirmed Violation(s).

(4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).

(5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).

(6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability *of the bulk* power-system while the Mitigation Plan is being implemented.

(7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.

(8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined for not completing work associated with accepted milestones.

(9) Any other information deemed necessary or appropriate.

(10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self-Certification or Self Reporting submittals.

---

[1] "*Uniform Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation*;" a copy of the current version approved by the Federal Energy Regulatory Commission is posted on NERC's website.

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- This submittal form shall be used to provide a required Mitigation Plan for review and approval by SERC and NERC.
- The Mitigation Plan shall be submitted to SERC and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
- This Mitigation Plan form may be used to address one or more related violations of one Reliability Standard. A separate mitigation plan is required to address violations with respect to each additional Reliability Standard, as applicable.
- If the Mitigation Plan is approved by SERC and NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission in accordance with applicable Commission rules, regulations and orders.
- SERC or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
- Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.

Section B: Registered Entity Information

B.1 Identify your organization:

Company Name: Sam Rayburn G&T Electric Cooperative, Inc.
Company Address: 2905 Westward Drive Nacogdoches, Texas 75961
NERC Compliance Registry ID ***[if known]***: NCR01307

B.2 Identify the individual in your organization who will serve as the Contact to SERC regarding this Mitigation Plan. This person shall be technically knowledgeable regarding this Mitigation Plan and authorized to respond to SERC regarding this Mitigation Plan.

Name: John Pasierb
Title: Project Manager
Email: john.pasierb@gdsassociates.com
Phone: 770-425-8100 X 180

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SERC Reliability Corporation

Section C: Identity of Reliability Standard Violations Associated with this Mitigation Plan

This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

C.1 Standard: FAC-008-1
[Identify by Standard Acronym (e.g. FAC-001-1)]

C.2 Requirement(s) violated and violation dates:
[Enter information in the following Table]

NERC Violation ID # [if known]	SERC Violation ID # [if known]	Requirement Violated (e.g. R3.2)	Violation Date(*)
	2007-178	R1.1	08/31/2007
	2007-178	R1.2	08/31/2007
	2007-178	R1.2.1	08/31/2007
	2007-178	R1.2.2	08/31/2007

(*) Note: The Violation Date shall be: (i) the date that the violation occurred; (ii) the date that the violation was self-reported; or (iii) the date that the violation has been deemed to have occurred on by SERC. Questions regarding the date to use should be directed to SERC.

C.3 Identify the cause of the violation(s) identified above:

The Facilities Rating document does not specifically state the most limiting equipment rating of the Facility determines the Facility Rating. Additionally, the methodology for Normal and Emergency ratings of facilities is not defined within the Facilities Rating document.

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

C.4 ***[Optional]*** Provide any relevant additional information regarding the violations associated with this Mitigation Plan:

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

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Section D: Details of Proposed Mitigation Plan

Mitigation Plan Contents

D.1 Identify and describe the action plan, including specific tasks and actions that your organization is proposing to undertake, or which it undertook if this Mitigation Plan has been completed, to correct the violations identified above in Part C.2 of this form:

The Facilities Rating document is being modified to incorporate a procedure for determining the Facility Rating based upon the most limiting equipment rating. In addition, the Facilities Rating document is currently being revised to incorporate the process utilized to determine the normal and emergency rating for all equipment within the facility.
[Provide your response here; additional detailed information may be provided as an attachment as necessary]

Check this box ☐ and proceed to Section E of this form if this Mitigation Plan, as set forth in Part D.1, has already been completed; otherwise respond to Part D.2, D.3 and, optionally, Part D.4, below.

Mitigation Plan Timeline and Milestones

D.2 Provide the timetable for completion of the Mitigation Plan, including the completion date by which the Mitigation Plan will be fully implemented and the violations associated with this Mitigation Plan are corrected: 1/31/2008

D.3 Enter Milestone Activities, with completion dates, that your organization is proposing for this Mitigation Plan:

Milestone Activity	Proposed Completion Date* (shall not be more than 3 months apart)
Develop modified Facilities Rating document	12/14/2007
Review process with impacted members	01/11/2008
Acceptance by Sam Rayburn G&T Electric Cooperative, Inc. Management and members	01/18/2008
Submit Certification of completed mitigation plan to SERC	01/31/2008

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(*) Note: Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined for not completing work associated with accepted milestones.

[Note: Provide your response here; additional detailed information may be provided as an attachment as necessary]

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SERC Reliability Corporation

Additional Relevant Information (Optional)

D.4 If you have any relevant additional information that you wish to include regarding the mitigation plan, milestones, milestones dates and completion date proposed above you may include it here:

The modified Facilities Rating document is currently being revised and is 80% complete. The Facilities Rating document is anticipated to be completed on time as provided for in the above mitigation plan.
[Provide your response here; additional detailed information may be provided as an attachment as necessary]

Section E: Interim and Future Reliability Risk

Check this box ☐ and proceed and respond to Part E.2 and E.3, below, if this Mitigation Plan, as set forth in Part D.1, has already been completed.

Abatement of Interim BPS Reliability Risk

E.1 While your organization is implementing the Mitigation Plan proposed in Part D of this form, the reliability of the Bulk Power System may remain at higher risk or be otherwise negatively impacted until the plan is successfully completed. To the extent they are, or may be, known or anticipated: (i) identify any such risks or impacts; and (ii) discuss any actions that your organization is planning to take or is proposing as part of the Mitigation Plan to mitigate any increased risk to the reliability of the bulk power system while the Mitigation Plan is being implemented:

There is minor to no impact anticipated to the Bulk Electric System resulting from the violation as rating considerations are currently based on equipment manufacturers, design criteria, ambient conditions, operating limitations, and other assumptions. These criteria will prevent any adverse impact to the Bulk Electric System.
[Provide your response here; additional detailed information may be provided as an attachment as necessary]

Prevention of Future BPS Reliability Risk

E.2 Describe how successful completion of the Mitigation Plan as laid out in Part D of this form will prevent or minimize the probability that your

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organization incurs further violations of the same or similar reliability standards requirements in the future:

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

E.3 Your organization may be taking or planning other action, beyond that listed in the Mitigation Plan, as proposed in Part D.1, to prevent or minimize the probability of incurring further violations of the same or similar standards requirements listed in Part C.2, or of other reliability standards. If so, identify and describe any such action, including milestones and completion dates:

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

Continued on Next Page

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SERC Reliability Corporation

Section F: Authorization

An authorized individual must sign and date this Mitigation Plan Submittal Form. By doing so, this individual, on behalf of your organization:

a) Submits the Mitigation Plan, as laid out in Section D of this form, to SERC for acceptance by SERC and approval by NERC, and

b) If applicable, certifies that the Mitigation Plan, as laid out in Section D of this form, was completed (i) as laid out in Section D of this form and (ii) on or before the date provided as the 'Date of Completion of the Mitigation Plan' on this form, and

c) Acknowledges:

1. I am Office Manager of Sam Rayburn G&T Electric Cooperative, Inc.

2. I am qualified to sign this Mitigation Plan on behalf of Sam Rayburn G&T Electric Cooperative, Inc.

3. I have read and understand Sam Rayburn G&T Electric Cooperative, Inc. obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure, including Appendix 4(C) (Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation" (NERC CMEP)).

4. I have read and am familiar with the contents of the foregoing Mitigation Plan.

5. Sam Rayburn G&T Electric Cooperative, Inc. agrees to be bound by, and comply with, the Mitigation Plan, including the timetable completion date, as approved by SERC and approved by NERC.

Authorized Individual Signature Tambra Offield
(Electronic signatures are acceptable; see CMEP)

Name (Print):Tambra Offield
Title: Office Manager
Date: 11/12/2007

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Section G: Comments and Additional Information

You may use this area to provide comments or any additional relevant information not previously addressed in this form.

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

Submittal Instructions:

Please convert the completed and signed document to an Adobe .pdf document using the following naming convention:

[(MP Entity Name (STD-XXX) MM-DD-YY.pdf)]

Email the pdf file to serccomply@serc1.org.

Please direct any questions regarding completion of this form to:

Ken Keels
Manager, Compliance Enforcement
SERC Reliability Corporation
704-357-7372
kkeels@serc1.org

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SERC Reliability Corporation

Mitigation Plan Submittal Form

Date this Mitigation Plan is being submitted: November 12, 2007

If this Mitigation Plan has already been completed:

- Check this box ☐ and
- Provide the Date of Completion of the Mitigation Plan:

Section A: Compliance Notices

- Section 6.2 of the CMEP[1] sets forth the information that must be included in a Mitigation Plan. The Mitigation Plan must include:

(1) The Registered Entity's point of contact for the Mitigation Plan, who shall be a person (i) responsible for filing the Mitigation Plan, (ii) technically knowledgeable regarding the Mitigation Plan, and (iii) authorized and competent to respond to questions regarding the status of the Mitigation Plan. This person may be the Registered Entity's point of contact described in Section 2.0.

(2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.

(3) The cause of the Alleged or Confirmed Violation(s).

(4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).

(5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).

(6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.

(7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.

(8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined for not completing work associated with accepted milestones.

(9) Any other information deemed necessary or appropriate.

(10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self-Certification or Self Reporting submittals.

[1] "*Uniform Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation*;" a copy of the current version approved by the Federal Energy Regulatory Commission is posted on NERC's website.

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- This submittal form shall be used to provide a required Mitigation Plan for review and approval by SERC and NERC.
- The Mitigation Plan shall be submitted to SERC and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
- This Mitigation Plan form may be used to address one or more related violations of one Reliability Standard. A separate mitigation plan is required to address violations with respect to each additional Reliability Standard, as applicable.
- If the Mitigation Plan is approved by SERC and NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission in accordance with applicable Commission rules, regulations and orders.
- SERC or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
- Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.

Section B: Registered Entity Information

B.1 Identify your organization:

Company Name: Sam Rayburn G&T Electric Cooperative, Inc.
Company Address: 2905 Westward Drive Nacogdoches, Texas 75961
NERC Compliance Registry ID ***[if known]***: NCR01307

B.2 Identify the individual in your organization who will serve as the Contact to SERC regarding this Mitigation Plan. This person shall be technically knowledgeable regarding this Mitigation Plan and authorized to respond to SERC regarding this Mitigation Plan.

Name: John Pasierb
Title: Project Manager
Email: john.pasierb@gdsassociates.com
Phone: 770-425-8100 X 180

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SERC Reliability Corporation

Section C: Identity of Reliability Standard Violations Associated with this Mitigation Plan

This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

C.1 Standard: CIP-001-1
[Identify by Standard Acronym (e.g. FAC-001-1)]

C.2 Requirement(s) violated and violation dates:
[Enter information in the following Table]

NERC Violation ID # [if known]	SERC Violation ID # [if known]	Requirement Violated (e.g. R3.2)	Violation Date(*)
	2007-198	R1	10/01/2007
	2007-198	R2	10/01/2007
	2007-198	R3	10/01/2007
	2007-198	R4	10/01/2007

(*) Note: The Violation Date shall be: (i) the date that the violation occurred; (ii) the date that the violation was self-reported; or (iii) the date that the violation has been deemed to have occurred on by SERC. Questions regarding the date to use should be directed to SERC.

C.3 Identify the cause of the violation(s) identified above:

Currently, Sam Rayburn G&T Electric Cooperative, Inc. has an Emergency Operations Plan in place that describes processes and procedures to be implemented in case of emergency or contingency situations, typically weather related. This Plan does not address recognition of sabotage events, procedures for recognizing a concerted attack on the Interconnection, communicating sabotage events to the Interconnection, or contacts with Federal Law Enforcement officials dealing with sabotage. Also, a policy has not been developed for sabotage response guidelines; hence, employee training in recognition has not occurred.
[Provide your response here; additional detailed information may be provided as an attachment as necessary]

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SERC Reliability Corporation

C.4 ***[Optional]*** Provide any relevant additional information regarding the violations associated with this Mitigation Plan:

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

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SERC Reliability Corporation

Section D: Details of Proposed Mitigation Plan

Mitigation Plan Contents

D.1 Identify and describe the action plan, including specific tasks and actions that your organization is proposing to undertake, or which it undertook if this Mitigation Plan has been completed, to correct the violations identified above in Part C.2 of this form:

The Emergency Operations Plan is being modified to incorporate sabotage recognition, training, reporting, and awareness. The plan will address recognition training and awareness of sabotage events. All local and Federal Law Enforcement contacts will be developed, maintained, and tested on a set schedule. A list of contacts, with method of contact (i.e. phone, email, facsimile, etc.), will be readily posted for quick response. Employees will be trained on the reporting responsibilities to all Law Enforcement, Interconnection personnel, and regulatory agencies.
[Provide your response here; additional detailed information may be provided as an attachment as necessary]

Check this box ☐ and proceed to Section E of this form if this Mitigation Plan, as set forth in Part D.1, has already been completed; otherwise respond to Part D.2, D.3 and, optionally, Part D.4, below.

Mitigation Plan Timeline and Milestones

D.2 Provide the timetable for completion of the Mitigation Plan, including the completion date by which the Mitigation Plan will be fully implemented and the violations associated with this Mitigation Plan are corrected: 1/31/2008

D.3 Enter Milestone Activities, with completion dates, that your organization is proposing for this Mitigation Plan:

Milestone Activity	Proposed Completion Date* (shall not be more than 3 months apart)
Develop modified Emergency Operations Plan	12/14/2007
Review process with impacted members	01/11/2008
Acceptance by Sam Rayburn G&T Electric Cooperative, Inc. Management and	01/18/2008

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members	
Submit Certification of completed mitigation plan to SERC	01/31/2008

(*) Note: Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined for not completing work associated with accepted milestones.

[Note: Provide your response here; additional detailed information may be provided as an attachment as necessary]

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SERC Reliability Corporation

Additional Relevant Information (Optional)

D.4 If you have any relevant additional information that you wish to include regarding the mitigation plan, milestones, milestones dates and completion date proposed above you may include it here:

The modified Emergency Operations Plan revision is 85% complete. The Emergency Operations Plan is anticipated to be completed on time as provided for in the above mitigation plan.
[Provide your response here; additional detailed information may be provided as an attachment as necessary]

Section E: Interim and Future Reliability Risk

Check this box ☐ and proceed and respond to Part E.2 and E.3, below, if this Mitigation Plan, as set forth in Part D.1, has already been completed.

Abatement of Interim BPS Reliability Risk

E.1 While your organization is implementing the Mitigation Plan proposed in Part D of this form, the reliability of the Bulk Power System may remain at higher risk or be otherwise negatively impacted until the plan is successfully completed. To the extent they are, or may be, known or anticipated: (i) identify any such risks or impacts; and (ii) discuss any actions that your organization is planning to take or is proposing as part of the Mitigation Plan to mitigate any increased risk to the reliability of the bulk power system while the Mitigation Plan is being implemented:

There is a minimal risk to the Bulk Electric System resulting from the violation of the NERC Standard. While no formal training has been provided to personnel, all personnel have become aware of the possibility of damage caused by human intervention. Most equipment that has an impact on the reliability of the Bulk Electric System is visited by personnel on a random basis for other reasons (i.e. meter readings, equipment checks, trouble calls). In addition, a Supervisory Control and Data Acquisition system monitors the electrical system for anomalies.
[Provide your response here; additional detailed information may be provided as an attachment as necessary]

Prevention of Future BPS Reliability Risk

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E.2 Describe how successful completion of the Mitigation Plan as laid out in Part D of this form will prevent or minimize the probability that your organization incurs further violations of the same or similar reliability standards requirements in the future:

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

E.3 Your organization may be taking or planning other action, beyond that listed in the Mitigation Plan, as proposed in Part D.1, to prevent or minimize the probability of incurring further violations of the same or similar standards requirements listed in Part C.2, or of other reliability standards. If so, identify and describe any such action, including milestones and completion dates:

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

Continued on Next Page

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SERC Reliability Corporation

Section F: Authorization

An authorized individual must sign and date this Mitigation Plan Submittal Form. By doing so, this individual, on behalf of your organization:

a) Submits the Mitigation Plan, as laid out in Section D of this form, to SERC for acceptance by SERC and approval by NERC, and

b) If applicable, certifies that the Mitigation Plan, as laid out in Section D of this form, was completed (i) as laid out in Section D of this form and (ii) on or before the date provided as the 'Date of Completion of the Mitigation Plan' on this form, and

c) Acknowledges:

1. I am Office Manager of Sam Rayburn G&T Electric Cooperative, Inc.

2. I am qualified to sign this Mitigation Plan on behalf of Sam Rayburn G&T Electric Cooperative, Inc.

3. I have read and understand Sam Rayburn G&T Electric Cooperative, Inc. obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure, including Appendix 4(C) (Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation" (NERC CMEP)).

4. I have read and am familiar with the contents of the foregoing Mitigation Plan.

5. Sam Rayburn G&T Electric Cooperative, Inc. agrees to be bound by, and comply with, the Mitigation Plan, including the timetable completion date, as approved by SERC and approved by NERC.

Authorized Individual Signature Tambra Offield
(Electronic signatures are acceptable; *see* CMEP)

Name (Print):Tambra Offield
Title: Office Manager
Date: 11/12/2007

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Section G: Comments and Additional Information

You may use this area to provide comments or any additional relevant information not previously addressed in this form.

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

Submittal Instructions:

Please convert the completed and signed document to an Adobe .pdf document using the following naming convention:

[(MP Entity Name (STD-XXX) MM-DD-YY.pdf)]

Email the pdf file to serccomply@serc1.org.

Please direct any questions regarding completion of this form to:

Ken Keels
Manager, Compliance Enforcement
SERC Reliability Corporation
704-357-7372
kkeels@serc1.org

CONFIDENTIAL INFORMATION

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GDS Associates, Inc.

Engineers and Consultants

January 24, 2008

Mr. John Wolfmeyer, P.E.
Compliance Engineer
SERC Reliability Corporation
2815 Coliseum Centre Drive
Suite 500
Charlotte, NC 28217

Re: East Texas Electric Cooperative, Inc. Mitigation Plan Extension Request
Tex-La of Texas Electric Cooperative, Inc. Mitigation Plan Extension Request
Sam Rayburn G&T Electric Cooperative, Inc. Mitigation Plan Extension Request

Mr. Wolfmeyer,

On November 12, 2007, GDS Associates, Inc. (GDS) submitted Mitigation Plans on behalf of East Texas Electric Cooperative, Inc. (ETEC), Tex-La of Texas Electric Cooperative, Inc. (Tex-La), and Sam Rayburn G&T Electric Cooperative, Inc. (SRG&T). The Mitigation Plans covered are FAC-008-1, and PRC-008. The following chart shows the breakdown of standards to each Registered Entity and includes the SERC Violation ID, the NERC Reliability Standard Requirement Violated, the original completion date for the mitigation plan, and the requested extension date for the completion of the mitigation plan.

Registered Entity	SERC Violation ID	NERC Reliability Standard	NERC Requirement Violated	Scheduled Mitigation Plan Completion	Mitigation Plan Extension Requested
ETEC	2007-177	FAC-008-1	R1.1, R1.2, R1.2.1, R1.2.2	01/31/08	02/29/08
SRG&T	2007-178	FAC-008-1	R1.1, R1.2, R1.2.1, R1.2.2	01/31/08	02/29/08
SRG&T	2007-187	PRC-008-0	R1	01/31/08	02/29/08
Tex-La	2007-179	FAC-008-1	R1.1, R1.2, R1.2.1, R1.2.2	01/31/08	02/29/08

The extension request became necessary when the process milestone was pushed out due to scheduling conflicts with member distribution cooperatives. This in turn pushed the acceptance by management and distribution cooperative members' milestone out as well. The informational meeting to the member distribution cooperatives was held on January 23, 2008. The informational meeting to management is scheduled for today. Based upon the milestone being pushed, and management receiving information late due to the pushed milestone, we respectfully request an

extension until February 29, 2008. This will allow ample time for review, changes, and signatures of delegation agreements to allow implementation to occur.

Thank you for your consideration of our request. If you have any questions at all, please do not hesitate to contact our office.

Sincerely,

John J. Pasierb
Project Manager
GDS Associates, Inc.
On behalf of ETEC, SRG&T, and Tex-La

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment f

Sam Rayburn G&T Electric Cooperative, Inc.'s certification of completion of the Mitigation Plans

SAM RAYBURN G & T
ELECTRIC COOPERATIVE, INC.
P.O. Box 631623 • Nacogdoches, Texas 75963-1623 • 936/560-9532 • FAX 936/560-9215

To Close Out a Completed Mitigation Plan, fill out this form, save and email it to serccomply@serc1.org.

All Mitigation Plan Completion Certification submittals shall include data or information sufficient for SERC to verify completion of the Mitigation Plan. SERC may request such additional data or information and conduct follow-up assessments, on-site or other Spot Checking, or Compliance Audits as it deems necessary to verify that all required actions in the Mitigation Plan have been completed and the Registered Entity is in compliance with the subject Reliability Standard. (CMEP Section 6.6)

Certification of a Completed Mitigation Plan

SERC Reliability Corporation
Violation Mitigation Plan Closure Form
(Form Revised 10-25-07)

Name of Registered Entity submitting certification: Sam Rayburn G&T Electric Cooperative, Inc.

Date of Certification: February 20, 2008

Name of Standard and the Requirement(s) of mitigated violation(s): PRC-005 R1

SERC Tracking Number (contact SERC if not known): 07-169

NERC Violation ID Number (if assigned): SERC200700018

Date of completion of the Mitigation Plan: 01/28/08

I certify that the mitigation plan for the above named violation has been completed on the date shown above, and that all information submitted information is complete and correct to the best of my knowledge.

Name: John J Pasierb
Title: Project Manager
Entity: GDS Associates, Inc. on behalf of Sam Rayburn G&T Electric Cooperative, Inc.
Email: john.pasierb@gdsassociates.com
Phone: 770-425-8100 X180

Executive Signature _____ Date 02/20/2008__

[NOTE – Closure Form should be signed by same individual that signed Mitigation Plan]

SAM RAYBURN G & T
ELECTRIC COOPERATIVE, INC.
P.O. Box 631623 • Nacogdoches, Texas 75963-1623 • 936/560-9532 • FAX 936/560-9215

To Close Out a Completed Mitigation Plan, fill out this form, save and email it to serccomply@serc1.org.

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Certification of a Completed Mitigation Plan

SERC Reliability Corporation
Violation Mitigation Plan Closure Form
(Form Revised 10-25-07)

Name of Registered Entity submitting certification: Sam Rayburn G&T Electric Cooperative, Inc.

Date of Certification: February 29, 2008

Name of Standard and the Requirement(s) of mitigated violation(s): FAC-008-1 R1

SERC Tracking Number (contact SERC if not known): 07-178

NERC Violation ID Number (if assigned): SERC200700024

Date of completion of the Mitigation Plan: February 29, 2008

I certify that the mitigation plan for the above named violation has been completed on the date shown above, and that all information submitted information is complete and correct to the best of my knowledge.

Name: John J. Pasierb
Title: Project Manager
Entity: GDS Associates, Inc. on behalf of Sam Rayburn G&T Electric Cooperative, Inc.
Email: john.pasierb@gdsassociates.com
Phone: 770-425-8100 x 180

Executive Signature _____ Date February 29, 2008

[NOTE – Closure Form should be signed by same individual that signed Mitigation Plan]

Print on Registered Entity's Corporate Letterhead

To Close Out a Completed Mitigation Plan, fill out this form, save and email it to serccomply@serc1.org.

All Mitigation Plan Completion Certification submittals shall include data or information sufficient for SERC to verify completion of the Mitigation Plan. SERC may request such additional data or information and conduct follow-up assessments, on-site or other Spot Checking, or Compliance Audits as it deems necessary to verify that all required actions in the Mitigation Plan have been completed and the Registered Entity is in compliance with the subject Reliability Standard. (CMEP Section 6.6)

Certification of a Completed Mitigation Plan

SERC Reliability Corporation
Violation Mitigation Plan Closure Form
(Form Revised 10-25-07)

Name of Registered Entity submitting certification: Sam Rayburn G&T Electric Cooperative, Inc.

Date of Certification: January 31, 2008

Name of Standard and the Requirement(s) of mitigated violation(s): CIP-001-1 R1, R2, R3, R4

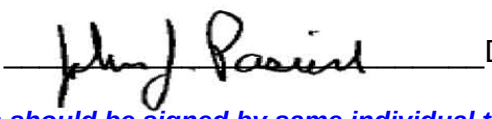
SERC Tracking Number (contact SERC if not known): 2007-198

NERC Violation ID Number (if assigned):

Date of completion of the Mitigation Plan: January 31, 2008

I certify that the mitigation plan for the above named violation has been completed on the date shown above, and that all information submitted information is complete and correct to the best of my knowledge.

Name: John J. Pasierb
Title: Project Manager
Entity: Sam Rayburn G&T Electric Cooperative, Inc.
Email: john.pasierb@gdsassociates.com
Phone: 770-425-8100 X180

Executive Signature  Date January 31, 2008

[NOTE – Closure Form should be signed by same individual that signed Mitigation Plan]

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment g

SERC Reliability Corporation's statement of verification that the Mitigation Plans have been completed

SERC Reliability Corporation
2815 Coliseum Centre Drive | Suite 500
Charlotte, NC 28217
704.357.7372 | Fax 704.357.7914 | www.serc1.org

Statement of SERC Reliability Corporation Compliance Enforcement Staff Regarding Completion of Mitigation Plan

March 11, 2008

Registered Entity: Sam Rayburn G&T Electric Cooperative Inc.
SERC Tracking ID: 2007-169
NERC Violation No: SERC200700018
NERC Mitigation Plan ID: MIT-07-0194

SERC Reliability Corporation Compliance Enforcement Staff ("SERC Staff") has completed a review of the evidence submitted by Sam Rayburn G&T Electric Cooperative Inc. in support of its Certification of Completion of the subject Mitigation Plan. Based on its review, SERC Staff has verified Sam Rayburn G&T Electric Cooperative Inc.'s certification on February 20, 2008 that the subject Mitigation Plan has been completed on January 28, 2008 in accordance with its terms.

Charles White
SERC Chairman
South Carolina Electric & Gas

William Ball
SERC Vice-Chairman
Southern Company Services, Inc.

Terry Blackwell
SERC Secretary-Treasurer
South Carolina Public Service Authority

SERC Reliability Corporation
2815 Coliseum Centre Drive | Suite 500
Charlotte, NC 28217
704.357.7372 | Fax 704.357.7914 | www.serc1.org

Statement of SERC Reliability Corporation Compliance Enforcement Staff Regarding Completion of Mitigation Plan

March 8, 2008

Registered Entity: Sam Rayburn G&T Electric Cooperative Inc.
SERC Tracking ID: 2007-178
NERC Violation No: SERC200700024
NERC Mitigation Plan ID: MIT-07-0238

SERC Reliability Corporation Compliance Enforcement Staff ("SERC Staff") has completed a review of the evidence submitted by Sam Rayburn G&T Electric Cooperative Inc. in support of its Certification of Completion of the subject Mitigation Plan. Based on its review, SERC Staff has verified Sam Rayburn G&T Electric Cooperative Inc.'s certification on February 29, 2008 that the subject Mitigation Plan has been completed on February 29, 2008 in accordance with its terms.

Charles White
SERC Chairman
South Carolina Electric & Gas

William Ball
SERC Vice-Chairman
Southern Company Services, Inc.

Terry Blackwell
SERC Secretary-Treasurer
South Carolina Public Service Authority

SERC Reliability Corporation
2815 Coliseum Centre Drive | Suite 500
Charlotte, NC 28217
704.357.7372 | Fax 704.357.7914 | www.serc1.org

Statement of SERC Reliability Corporation Compliance Enforcement Staff Regarding Completion of Mitigation Plan

February 25, 2008

Registered Entity: Sam Rayburn G&T Electric Cooperative Inc.
SERC Tracking ID: 2007-198
NERC Violation No: SERC200700027, 28, 29, 30
NERC Mitigation Plan ID: MIT-07-0241

SERC Reliability Corporation Compliance Enforcement Staff ("SERC Staff") has completed a review of the evidence submitted by Sam Rayburn G&T Electric Cooperative Inc. in support of its Certification of Completion of the subject Mitigation Plan. Based on its review, SERC Staff has verified Sam Rayburn G&T Electric Cooperative Inc.'s certification on January 31, 2008 that the subject Mitigation Plan has been completed on January 31, 2008 in accordance with its terms.

Charles White
SERC Chairman
South Carolina Electric & Gas

William Ball
SERC Vice-Chairman
Southern Company Services, Inc.

Terry Blackwell
SERC Secretary-Treasurer
South Carolina Public Service Authority

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment h

NERC BOTCC Decision

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Board of Trustees Compliance Committee
Decision on Notices of Penalty
(Issued May 21, 2008)

The North American Electric Reliability Corporation (NERC) Board of Trustees Compliance Committee approves for filing with the Federal Energy Regulatory Commission (Commission) the following Notices of Penalty in accordance with the NERC *Rules of Procedure* and the Commission's orders and regulations.[1]

In each of the Notices identified below, the Board of Trustees Compliance Committee affirms the Regional Entity's determination to exercise its enforcement discretion, in accordance with Order No. 693, to impose a zero dollar penalty against the respective registered entities, based on the Committee's review of the applicable requirements of the Commission-approved Reliability Standards and the underlying facts and circumstances of the violations represented below.[2]

While certain of the Reliability Standards associated with the violations below have "Medium" or "High" Violation Risk Factors, and the non-compliance level could reach a "Severe" level based on the duration of the violation, most of these violations involved situations where processes, procedures or plans were in place but documentation of one or more elements was lacking. In the case of NOC-16 below, where an entity failed to perform relay maintenance and testing of certain of its facilities due to an administrative oversight, the entity self-reported the violation and expedited completion of the work. In all cases, there was no actual impact on the reliability of the bulk power system.

In reaching this determination, NERC and the Regional Entities considered the following: (1) The violations occurred prior to January 2008 (during the period the Commission stated NERC and the Regional Entities should focus their enforcement resources on the most serious violations); (2) The registered entities worked cooperatively with the Regional Entities; (3) The registered entities acted immediately to mitigate and/or correct the violations; (4) The violations were mitigated in accordance with the approved Mitigation Plans and have been verified as mitigated by the respective Regional Entities; and (5) The actions taken by the registered entities ensure that reliability is maintained.

Therefore, the NERC Board of Trustees Compliance Committee finds that the proposed zero dollar penalty is appropriate and consistent with NERC's goal to ensure reliability of the bulk power system.

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[1] *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards* (Order No. 672), III FERC Stats. & Regs. ¶ 31,204 (2006); *Notice of New Docket Prefix "NP" for Notices of Penalty Filed by the North American Electric Reliability Corporation*, Docket No. RM05-30-000 (February 7, 2008). *See also* 18 C.F.R. Part 39 (2008).

[2] *Mandatory Reliability Standards for the Bulk-Power System*, FERC Stats. & Regs. ¶ 31,242 (2007) (Order No. 693).

NOP ID[3]	Region	Registered Entity	NOC ID	NERC Violation ID	Reliability Std.	Req. (R)	VRF	Total Penalty ($)
NOP-01	TRE	Denton Municipal Electric (TDSP)	NOC-01	TRE200700001	PRC-008-0	1	Medium	0
	TRE	Denton Municipal Electric (TDSP)	NOC-01	TRE200700002	PRC-008-0	2	Medium	0
NOP-02	TRE	Bandera Electric Cooperative, Inc	NOC-02	TRE200700003	PRC-005-1	2	Lower/ High[4]	0
NOP-03	TRE	Exelon Generation Company, LLC	NOC-03	TRE200700004	PRC-005-1	2	Lower/ High	0
NOP-05	TRE	Suez Energy Marketing NA Inc	NOC-05	TRE200700011	CIP-001-1	1	Medium	0
	TRE	Suez Energy Marketing NA Inc	NOC-05	TRE200700012	CIP-001-1	2	Medium	0
	TRE	Suez Energy Marketing NA Inc	NOC-05	TRE200700013	CIP-001-1	3	Medium	0
	TRE	Suez Energy Marketing NA Inc	NOC-05	TRE200700014	CIP-001-1	4	Medium	0
	TRE	Suez Energy Marketing NA Inc	NOC-05	TRE200700015	IRO-004-1	4	High	0
NOP-06	TRE	Wise County Power Company, LP	NOC-06	TRE200700016	FAC-008-1	1	Lower/ Medium	0
	TRE	Wise County Power Company, LP	NOC-06	TRE200700017	FAC-008-1	2	Lower	0
	TRE	Wise County Power Company, LP	NOC-06	TRE200700018	FAC-008-1	3	Lower	0
	TRE	Wise County Power Company, LP	NOC-06	TRE200700019	FAC-009-1	1	Medium	0
	TRE	Wise County Power Company, LP	NOC-06	TRE200700020	FAC-009-1	2	Medium	0
	TRE	Wise County Power Company, LP	NOC-06	TRE200700021	IRO-004-1	4	High	0

[3] Document numbers for each of these notices.will be assigned by the Commission as NP08-_-000.
[4] All VRFs for requirements and sub-requirements are identified in this table for the violations at issue.

NOP ID	Region	Registered Entity	NOC ID	NERC Violation ID	Reliability Std.	Req. (R)	VRF	Total Penalty ($)
NOP-07	SERC	City of Columbia, MO	NOC-07	SERC200700002	PER-002-0	3	High/ Medium	0
	SERC	City of Columbia, MO	NOC-07	SERC200700003	TPL-001-0	1	High/ Medium	0
	SERC	City of Columbia, MO	NOC-07	SERC200700004	TPL-002-0	1	High/ Medium	0
	SERC	City of Columbia, MO	NOC-07	SERC200700005	TPL-003-0	1	High/ Medium	0
	SERC	City of Columbia, MO	NOC-07	SERC200700006	TPL-004-0	1	Medium	0
NOP-08	SERC	Old Dominion Electric Cooperative	NOC-08	SERC200700010	FAC-008-1	1	Lower/ Medium	0
	SERC	Old Dominion Electric Cooperative	NOC-08	SERC200700011	PRC-005-1	1	High	0
NOP-09	SERC	Doyle l, LLC	NOC-09	SERC200700012	CIP-001-1	4	Medium	0
NOP-10	SERC	Illinois Municipal Electric Agency	NOC-11	SERC200700058	CIP-001-1	1	Medium	0
	SERC	Illinois Municipal Electric Agency	NOC-11	SERC200700059	CIP-001-1	2	Medium	0
	SERC	Illinois Municipal Electric Agency	NOC-11	SERC200700060	CIP-001-1	3	Medium	0
	SERC	Illinois Municipal Electric Agency	NOC-11	SERC200700061	CIP-001-1	4	Medium	0
NOP-11	MRO	Northern States Power	NOC-13	MRO200700004	CIP-001-1	2	Medium	0
NOP-12	MRO	Rochester Public Utilities	NOC-14	MRO200700005	PER-002-0	3	High/ Medium	0
	MRO	Rochester Public Utilities	NOC-14	MRO200700006	PRC-004-1	2	High	0
	MRO	Rochester Public Utilities	NOC-14	MRO200700007	VAR-001-1	6	Medium	0
NOP-13	MRO	Tri-State G&T – Merchant	NOC-15	MRO200700008	INT-004-1	2	Lower	0
NOP-14	MRO	American Transmission Co., LLC	NOC-16	MRO200700009	PRC-005-1	2	Lower/ High	0

NOP ID	Region	Registered Entity	NOC ID	NERC Violation ID	Reliability Std.	Req. (R)	VRF	Total Penalty ($)
NOP-15	NPCC	The City of Holyoke Gas and Electric Department	NOC-19	NPCC200700011	CIP-001-1	1	Medium	0
	NPCC	The City of Holyoke Gas and Electric Department	NOC-19	NPCC200700012	CIP-001-1	2	Medium	0
	NPCC	The City of Holyoke Gas and Electric Department	NOC-19	NPCC200700013	CIP-001-1	3	Medium	0
	NPCC	The City of Holyoke Gas and Electric Department	NOC-19	NPCC200700014	CIP-001-1	4	Medium	0
NOP-16	NPCC	Peabody Municipal Light Plant	NOC-22	NPCC200700015	CIP-001-1	1	Medium	0
	NPCC	Peabody Municipal Light Plant	NOC-22	NPCC200700016	CIP-001-1	2	Medium	0
	NPCC	Peabody Municipal Light Plant	NOC-22	NPCC200700017	CIP-001-1	3	Medium	0
	NPCC	Peabody Municipal Light Plant	NOC-22	NPCC200700018	CIP-001-1	4	Medium	0
NOP-17	NPCC	Norwich Public Utilities	NOC-23	NPCC200700019	CIP-001-1	1	Medium	0
	NPCC	Norwich Public Utilities	NOC-23	NPCC200700020	CIP-001-1	2	Medium	0
	NPCC	Norwich Public Utilities	NOC-23	NPCC200700021	CIP-001-1	3	Medium	0
	NPCC	Norwich Public Utilities	NOC-23	NPCC200700022	CIP-001-1	4	Medium	0
NOP-18	SERC	City of Orangeburg Department of Public Utilities	NOC-26	SERC200700016	PRC-005-1	1	High	0
NOP-19	SERC	West Georgia Generating Company, LLC	NOC-27	SERC200700048	PRC-005-1	2	Lower/ High	0
	SERC	West Georgia Generating Company, LLC	NOC-27	SERC200700064	PRC-005-1	1	High	0
	SERC	West Georgia Generating Company, LLC	NOC-27	SERC200700065	CIP-001-1	4	Medium	0

NOP ID	Region	Registered Entity	NOC ID	NERC Violation ID	Reliability Std.	Req. (R)	VRF	Total Penalty ($)
NOP-20	SERC	Caledonia Generating, LLC	NOC-28	SERC200700052	FAC-008-1	1	Lower/ Medium	0
NOP-21	SERC	City of Orangeburg Department of Public Utilities	NOC-29	SERC200700054	CIP-001-1	1	Medium	0
	SERC	City of Orangeburg Department of Public Utilities	NOC-29	SERC200700055	CIP-001-1	2	Medium	0
	SERC	City of Orangeburg Department of Public Utilities	NOC-29	SERC200700056	CIP-001-1	3	Medium	0
	SERC	City of Orangeburg Department of Public Utilities	NOC-29	SERC200700057	CIP-001-1	4	Medium	0
NOP-22	SPP	Southwestern Public Service Co. (SPS-XCEL)	NOC-30	SPP200700002	EOP-001-0	3.4	Medium	0
	SPP	Southwestern Public Service Co. (SPS-XCEL)	NOC-30	SPP200700003	EOP-001-0	4.4	Medium	0
	SPP	Southwestern Public Service Co. (SPS-XCEL)	NOC-30	SPP200700004	EOP-001-0	5	Medium	0
	SPP	Southwestern Public Service Co. (SPS-XCEL)	NOC-30	SPP200700005	EOP-005-1	1	Medium	0
	SPP	Southwestern Public Service Co. (SPS-XCEL)	NOC-30	SPP200700006	CIP-001-1	2	Medium	0
NOP-23	SERC	East Texas Electric Cooperative, Inc.	NOC-31	SERC200700017	PRC-005-1	1	High	0
	SERC	East Texas Electric Cooperative, Inc.	NOC-31	SERC200700025	FAC-008-1	1	Lower/ Medium	0
	SERC	East Texas Electric Cooperative, Inc.	NOC-31	SERC200700031	CIP-001-1	1	Medium	0
	SERC	East Texas Electric Cooperative, Inc.	NOC-31	SERC200700032	CIP-001-1	2	Medium	0
	SERC	East Texas Electric Cooperative, Inc.	NOC-31	SERC200700033	CIP-001-1	3	Medium	0
	SERC	East Texas Electric Cooperative, Inc.	NOC-31	SERC200700034	CIP-001-1	4	Medium	0

NOP ID	Region	Registered Entity	NOC ID	NERC Violation ID	Reliability Std.	Req. (R)	VRF	Total Penalty ($)
NOP-24	SERC	Sam Rayburn G&T Electric Cooperative, Inc.	NOC-32	SERC200700018	PRC-005-1	1	High	0
	SERC	Sam Rayburn G&T Electric Cooperative, Inc.	NOC-32	SERC200700024	FAC-008-1	1	Lower/ Medium	0
	SERC	Sam Rayburn G&T Electric Cooperative, Inc.	NOC-32	SERC200700027	CIP-001-1	1	Medium	0
	SERC	Sam Rayburn G&T Electric Cooperative, Inc.	NOC-32	SERC200700028	CIP-001-1	2	Medium	0
	SERC	Sam Rayburn G&T Electric Cooperative, Inc.	NOC-32	SERC200700029	CIP-001-1	3	Medium	0
	SERC	Sam Rayburn G&T Electric Cooperative, Inc.	NOC-32	SERC200700030	CIP-001-1	4	Medium	0
NOP-25	SERC	Tex-LA Electric Coop of Texas, Inc.	NOC-33	SERC200700020	PRC-005-1	1	High	0
	SERC	Tex-LA Electric Coop of Texas, Inc.	NOC-33	SERC200700026	FAC-008-1	1	Lower/ Medium	0
	SERC	Tex-LA Electric Coop of Texas, Inc.	NOC-33	SERC200700035	CIP-001-1	1	Medium	0
	SERC	Tex-LA Electric Coop of Texas, Inc.	NOC-33	SERC200700036	CIP-001-1	2	Medium	0
	SERC	Tex-LA Electric Coop of Texas, Inc.	NOC-33	SERC200700037	CIP-001-1	3	Medium	0
	SERC	Tex-LA Electric Coop of Texas, Inc.	NOC-33	SERC200700038	CIP-001-1	4	Medium	0
NOP-26	SERC	The Dow Chemical Company	NOC-35	SERC200700022	IRO-004-1	4	High	0
	SERC	The Dow Chemical Company	NOC-35	SERC200700023	TOP-003-0	1	Medium	0
	SERC	The Dow Chemical Company	NOC-35	SERC200700053	PRC-005-1	2	Lower/ High	0
	SERC	The Dow Chemical Company	NOC-35	SERC200700069	FAC-009-1	1	Medium	0
	SERC	The Dow Chemical Company	NOC-35	SERC200700070	FAC-009-1	2	Medium	0
	SERC	The Dow Chemical Company	NOC-35	SERC200700072	PRC-004-1	2	High	0
	SERC	The Dow Chemical Company	NOC-35	SERC200700073	PRC-004-1	3	Lower	0

NOP ID	Region	Registered Entity	NOC ID	NERC Violation ID	Reliability Std.	Req. (R)	VRF	Total Penalty ($)
NOP-27	SERC	City of North Little Rock, AR (DENL)	NOC-37	SERC200700041	PER-002-0	3.1	Medium	0
NOP-28	SERC	Cottonwood Energy, LP	NOC-42	SERC200700047	PRC-005-1	1	High	0
NOP-29	SERC	Reliant Energy Wholesale Generation, LLC	NOC-43	SERC200700049	PRC-005-1	1	High	0
NOP-30	SERC	Prairie Power, Inc.	NOC-44	SERC200700050	FAC-008-1	1	Lower/ Medium	0
NOP-31	SERC	Mt..Carmel Public Utility Co.	NOC-45	SERC200700062	CIP-001-1	4	Medium	0
NOP-32	SERC	Craven County Wood Energy, LP	NOC-46	SERC200700063	PRC-005-1	1	High	0
NOP-33	SERC	City of Benton	NOC-47	SERC200700066	PER-002-0	3.1	Medium	0
NOP-34	SERC	Elizabethtown Power, LLC	NOC-48	SERC200700067	IRO-004-1	4	High	0
	SERC	Elizabethtown Power, LLC	NOC-48	SERC200700074	CIP-001-1	1	Medium	0
	SERC	Elizabethtown Power, LLC	NOC-48	SERC200700075	CIP-001-1	2	Medium	0
	SERC	Elizabethtown Power, LLC	NOC-48	SERC200700076	CIP-001-1	3	Medium	0
	SERC	Elizabethtown Power, LLC	NOC-48	SERC200700077	CIP-001-1	4	Medium	0
	SERC	Elizabethtown Power, LLC	NOC-48	SERC200700078	PRC-005-1	1	High	0
	SERC	Elizabethtown Power, LLC	NOC-48	SERC200700084	FAC-008-1	1	Lower/ Medium	0
	SERC	Elizabethtown Power, LLC	NOC-48	SERC200700085	FAC-009-1	1	Medium	0
NOP-35	SERC	Lumberton Power, LLC	NOC-49	SERC200700068	IRO-004-1	4	High	0
	SERC	Lumberton Power, LLC	NOC-49	SERC200700079	CIP-001-1	1	Medium	0
	SERC	Lumberton Power, LLC	NOC-49	SERC200700080	CIP-001-1	2	Medium	0
	SERC	Lumberton Power, LLC	NOC-49	SERC200700081	CIP-001-1	3	Medium	0
	SERC	Lumberton Power, LLC	NOC-49	SERC200700082	CIP-001-1	4	Medium	0
	SERC	Lumberton Power, LLC	NOC-49	SERC200700083	PRC-005-1	1	High	0
	SERC	Lumberton Power, LLC	NOC-49	SERC200700086	FAC-008-1	1	Lower/ Medium	0
	SERC	Lumberton Power, LLC	NOC-49	SERC200700087	FAC-009-1	1	Medium	0

NOP ID	Region	Registered Entity	NOC ID	NERC Violation ID	Reliability Std.	Req. (R)	VRF	Total Penalty ($)
NOP-36	TRE	TOPAZ POWER MANAGEMENT LP (QSE)	NOC-53	TRE200800028	CIP-001-1	1	Medium	0
NOP-37	SERC	Associated Electric Cooperative Inc.	NOC-24	SERC200700001	FAC-003-1	2	High	0

By the Board of Trustees Compliance Committee

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment i

Notice of Filing

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Sam Rayburn G&T Electric Cooperative, Inc. Docket No. NP08-___-000

NOTICE OF FILING
(DATE)

Take notice that on [DATE], the North American Electric Reliability Corporation (NERC) filed a Notice of Penalty regarding Sam Rayburn G&T Electric Cooperative, Inc. in the SERC Reliability Corporation region.

Any person desiring to intervene or to protest this filing must file in accordance with Rules 211 and 214 of the Commission's Rules of Practice and Procedure (18 CFR 385.211, 385.214). Protests will be considered by the Commission in determining the appropriate action to be taken, but will not serve to make protestants parties to the proceeding. Any person wishing to become a party must file a notice of intervention or motion to intervene, as appropriate. Such notices, motions, or protests must be filed on or before the comment date. On or before the comment date, it is not necessary to serve motions to intervene or protests on persons other than the Applicant.

The Commission encourages electronic submission of protests and interventions in lieu of paper using the "eFiling" link at http://www.ferc.gov. Persons unable to file electronically should submit an original and 14 copies of the protest or intervention to the Federal Energy Regulatory Commission, 888 First Street, N.E., Washington, D.C. 20426.

This filing is accessible on-line at http://www.ferc.gov, using the "eLibrary" link and is available for review in the Commission's Public Reference Room in Washington, D.C. There is an "eSubscription" link on the web site that enables subscribers to receive email notification when a document is added to a subscribed docket(s). For assistance with any FERC Online service, please email FERCOnlineSupport@ferc.gov, or call (866) 208-3676 (toll free). For TTY, call (202) 502-8659.

Comment Date: [BLANK]

Kimberly D. Bose,
Secretary