

NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

December 30, 2011

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

Re: NERC FFT Informational Filing FERC Docket No. RC12-__-000

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides the attached Find Fix and Track Report¹ (FFT) in Attachment A regarding 40 Registered Entities² listed therein,³ 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)).⁴

This FFT resolves 76 possible violations⁵ of 19 Reliability Standards that posed a lesser risk (minimal to moderate) to the reliability of the bulk power system (BPS). In all cases, the possible violations contained in this FFT have been found and fixed, so they are now described as "remediated issues." A statement of completion of the mitigation activities has been submitted by the respective Registered Entities.

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 (2011). 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). See 18 C.F.R § 39.7(c)(2). See also Notice of No Further Review and Guidance Order, 132 FERC ¶ 61,182 (2010).

² Corresponding NERC Registry ID Numbers for each Registered Entity are identified in Attachment A.

³ Attachment A is an Excel spreadsheet.

⁴ See 18 C.F.R § 39.7(c)(2).

⁵ For purposes of this document, each matter is described as a "possible violation," regardless of its procedural posture.

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As discussed below, this FFT includes 76 remediated issues. These FFT remediated issues are being submitted for informational purposes only. The Commission has encouraged the use of streamlined enforcement processes for occurrences that posed lesser risk to the BPS.⁶ Resolution of these lesser risk possible violations in this reporting format is appropriate disposition of these matters, and will help NERC and the Regional Entities focus on the more serious violations of the mandatory and enforceable NERC Reliability Standards.

Statement of Findings Underlying the FFT

The descriptions of the remediated issues and related risk assessments are set forth in Attachment A.

This filing contains the basis for approval by NERC Enforcement staff, under delegated authority from the NERC Board of Trustees Compliance Committee (NERC BOTCC), of the findings reflected in Attachment A. In accordance with Section 39.7 of the Commission's regulations, 18 C.F.R. § 39.7 (2011), each Reliability Standard at issue in this FFT is identified in Attachment A.

Text of the Reliability Standards at issue in the FFT may be found on NERC's website at http://www.nerc.com/page.php?cid=2|20. For each respective remediated issue, the Reliability Standard Requirement at issue is listed in Attachment A.

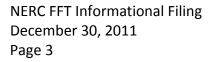
Status of Mitigation⁷

As noted above and reflected in Attachment A, the possible violations identified in Attachment A have been mitigated. The respective Registered Entity has submitted a statement of completion of the mitigation activities to the Regional Entity. These mitigation activities are subject to verification by the Regional Entity via an audit, spot check, random sampling, a request for information, or otherwise. These activities are described in Attachment A for each respective possible violation.

⁶ See North American Electric Reliability Standards Development and NERC and Regional Entity Enforcement, 132 FERC ¶ 61,217 at P.218 (2010)(encouraging streamlined administrative processes aligned with the significance of the subject violations).

⁷ See 18 C.F.R § 39.7(d)(7).





Statement Describing the Resolution⁸

Basis for Determination

Taking into consideration the Commission's direction in Order No. 693, the NERC Sanction Guidelines and the Commission's July 3, 2008 Guidance Order, the October 26, 2009 Guidance Order and the August 27, 2010 Guidance Order,⁹ NERC Enforcement staff under delegated authority from the NERC BOTCC, approved the FFT based upon its findings and determinations, as well as its review of the applicable requirements of the Commission-approved Reliability Standards, and the underlying facts and circumstances of the remediated issues.

Request for Confidential Treatment of Certain Attachments

Certain portions of Attachment A include confidential information as defined by the Commission's regulations at 18 C.F.R. Part 388 and orders, as well as NERC Rules of Procedure including the NERC CMEP Appendix 4C to the Rules of Procedure. This includes non-public information related to certain Reliability Standard possible violations and confidential information regarding critical energy infrastructure.

In accordance with the Commission's Rules of Practice and Procedure, 18 C.F.R. § 388.112, a non-public version of the information redacted from the public filing is being provided under separate cover.

Because certain of the information in the attached documents is deemed "confidential" by NERC, Registered Entities and Regional Entities, NERC requests that the confidential, non-public information be provided special treatment in accordance with the above regulation.

⁸ See 18 C.F.R § 39.7(d)(4).

⁹ North American Electric Reliability Corporation, "Guidance Order on Reliability Notices of Penalty," 124 FERC ¶ 61,015 (2008); North American Electric Reliability Corporation, "Further Guidance Order on Reliability Notices of Penalty," 129 FERC ¶ 61,069 (2009); North American Electric Reliability Corporation, 132 FERC ¶ 61,182 (2010).





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Attachments to be included as Part of this FFT Informational Filing

The attachments to be included as part of this FFT Informational Filing are the following documents and material:

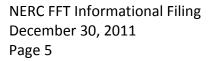
- a) Find Fix and Track Report Spreadsheet, included as Attachment A; and
- b) Additions to the service list, included as Attachment B.

A Form of Notice Suitable for Publication¹⁰

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

¹⁰ See 18 C.F.R § 39.7(d)(6).



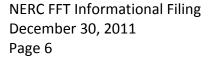


Notices and Communications

Notices and communications with respect to this filing may be addressed to the following as well as to the entities included in Attachment B to this FFT:

Gerald W. Cauley	Rebecca J. Michael*
President and Chief Executive Officer	Associate General Counsel for Corporate and
North American Electric Reliability	Regulatory Matters
Corporation	North American Electric Reliability Corporation
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Suite 600, North Tower	Suite 600
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(404) 446-2560	(202) 400-3000
David N. Cook*	rebecca.michael@nerc.net
Senior Vice President and General Counsel	
North American Electric Reliability	
Corporation	
· ·	
1325 G Street N.W., Suite 600	
Washington, DC 20005	
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david.cook@nerc.net	
*Persons to be included on the Commission's	
service list are indicated with an asterisk. NERC	
requests waiver of the Commission's rules and	
regulations to permit the inclusion of more than	
two people on the service list. See also	
Attachment B for additions to the service list.	

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Conclusion

Handling these remediated issues in a streamlined process will help NERC, the Regional Entities, Registered Entities, and the Commission focus on improving reliability and holding Registered Entities accountable for the more serious violations of the mandatory and enforceable NERC Reliability Standards. Accordingly, NERC respectfully submits this FFT as an informational filing.

Respectfully submitted,

Gerald W. Cauley President and Chief Executive Officer North American Electric Reliability Corporation 3353 Peachtree Road NE Suite 600, North Tower Atlanta, GA 30326-1001 (404) 446-2560

David N. Cook Senior Vice President and General Counsel North American Electric Reliability Corporation 1325 G Street N.W., Suite 600 Washington, DC 20005 (202) 400-3000 david.cook@nerc.net

/s/ Rebecca J. Michael

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cc: Entities listed in Attachment B



Attachment a

Fix and Track Report Spreadsheet (Included in a Separate Document)



Attachment b

Additions to the service list

ATTACHMENT B

REGIONAL ENTITY SERVICE LIST FOR DECEMBER 2011 FIND FIX AND TRACK REPORT (FFT) INFORMATIONAL FILING

FOR FRCC:

Sarah Rogers* President and Chief Executive officer Florida Reliability Coordinating Council, Inc. 1408 N. Westshore Blvd., Suite 1002 Tampa, Florida 33607-4512 (813) 289-5644 (813) 289-5646 – facsimile srogers@frcc.com

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FOR MRO:

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FOR RFC:

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FOR SERC:

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Kenneth B. Keels, Jr.* Director of Compliance Andrea Koch* Manager, Compliance Enforcement and Mitigation SERC Reliability Corporation 2815 Coliseum Centre Drive Charlotte, NC 28217 (704) 940-8214 (704) 357-7914 – facsimile kkeels@serc1.org akoch@serc1.org

FOR SPP RE:

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Joe Gertsch* Manager of Enforcement Southwest Power Pool Regional Entity 16101 La Grande, Ste 103 Little Rock, AR 72223 (501) 688-1672 (501) 821-8726 – facsimile jgertsch.re@spp.org

Machelle Smith* Paralegal & SPP RE File Clerk Southwest Power Pool Regional Entity 16101 La Grande, Ste 103 Little Rock, AR 72223 (501) 688-1681 (501) 821-8726 – facsimile spprefileclerk@spp.org

FOR Texas RE:

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Rashida Caraway* Manager, Compliance Enforcement Texas Reliability Entity, Inc. 805 Las Cimas Parkway Suite 200 Austin, TX 78746 (512) 583-4977 (512) 233-2233 – facsimile rashida.caraway@texasre.org

FOR WECC:

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FOR NCEA:

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Attachment c

Notice of Filing

ATTACHMENT C

UNITED STATES OF AMERICA FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability Corporation

Docket No. RC12-___-000

NOTICE OF FILING December 30, 2011

Take notice that on December 30, 2011, the North American Electric Reliability Corporation (NERC) filed a FFT Informational Filing regarding forty (40) Registered Entities in seven (7) Regional Entity footprints and NERC as the Compliance Enforcement Authority.

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