

March 10, 2014

**VIA ELECTRONIC FILING**

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

**Re: FERC Docket No. NP14-19-000  
Errata to Notice of Penalty for Unidentified Registered Entity**

On December 30, 2013, the North American Electric Reliability Corporation (NERC) submitted a Notice of Penalty filing. The filing contained a typographical error. Specifically, the penalty amount should have been \$185,000.

Also, in addition to the monetary sanction, the entity agreed to undertake certain activities which were not outlined in detail in the public version of the filing. These activities include:

1. Strengthen compliance training and oversight. Create, document, and implement a compliance training program. The program must include training on compliance with applicable NERC Reliability Standards, violation detection, violation reporting, and violation mitigation;
  - a. The training program will include measurable performance targets such as: i) time-based goals for submission of compliance documents to WECC; ii) a defined time-period for prompt submission of Self-Reports following discovery of Possible Violations; and iii) a defined time-period to promptly submit Mitigation Plans following Self-Report filings; and
  - b. The entity must ensure all employees and contractors receive an appropriate level of effective training;
2. Strengthen policies and procedures related to reporting and mitigation by taking the following actions:
  - a. Implement policies and procedures that improve communication and collaboration between compliance staff and operations personnel;
  - b. Establish or improve monthly or bimonthly compliance coordination meetings in which operations, planning, technical and compliance groups are in attendance;

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- c. Implement internal processes and procedures to quickly detect and report CIP-related violations; and
  - d. Implement internal processes and procedures to ensure mitigation activity is tracked and to ensure the entity submits requisite documentation to WECC on time;
3. The entity must submit a written update to WECC. The update must describe actions completed to date to satisfy terms outlined above. The update must also describe the actions the entity plans to undertake to address outstanding items;
4. The entity must submit a written report to WECC. The report must describe how the entity implemented the above-described actions. The entity must also provide evidence, such as training programs and materials, updated procedures, and policies that were created or modified per the settlement terms. The report must include a summary of the changes made to each procedure as applicable, as well as additional information describing the actions the entity took to meet the above-described terms; and
5. The entity must submit an internal compliance program (ICP) to WECC using the available ICP assessment documentation.

Please contact the undersigned with any questions regarding the submittal.

Respectfully submitted,

*/s/ Edwin Kichline*

Edwin Kichline  
Senior Counsel and Associate Director,  
Enforcement Processing  
North American Electric Reliability  
Corporation