



NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

February 1, 2010

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

**Re: NERC Notice of Penalty regarding Utah Associated Municipal Power Systems
FERC Docket No. NP10-_-000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this Notice of Penalty¹ regarding Utah Associated Municipal Power Systems (UAMP), NERC Registry ID# NCR05445,^{2,3} 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

On July 10, 2008, UAMP self-certified⁵ to Western Electricity Coordinating Council (WECC) possible violations of Reliability Standards MOD-010-0 Requirement (R) 1 and R2, and MOD-012-0 R1 and R2 for UAMP's failure to: (1) provide appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling and simulation data requirements and reporting procedures for small behind-the meter generating facilities; (2) provide that data as required to

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). See 18 C.F.R. § 39.7(c)(2).

² Western Electricity Coordinating Council confirmed that UAMP was included on the NERC Compliance Registry as a Generator Operator, Generator Owner and Purchasing-Selling Entity on June 17, 2007, and as a Resource Planner on March 11, 2008. As a Generator Owner and Resource Planner specified in the data requirements and reporting procedures of MOD-011-0 R1, UAMP is subject to the requirements of NERC Reliability Standard MOD-010-0. As a Generator Owner and Resource Planner specified in the data requirements and reporting procedures of MOD-013-0 R1, UAMP is subject to the requirements of NERC Reliability Standard MOD-012-0.

³ UAMP is a political subdivision of the state of Utah that provides comprehensive wholesale electric energy, on a nonprofit basis, to community-owned power systems throughout the Intermountain West. The UAMP membership represents 53 Members in Utah, Arizona, California, Idaho, Nevada, New Mexico, Oregon and Wyoming. UAMP was established in 1980 under the Utah Interlocal Cooperation Act, and is a political subdivision of the State of Utah.

⁴ See 18 C.F.R. § 39.7(c)(2).

⁵ The Settlement Agreement mischaracterizes the reporting as a Self Report but the violations were in fact a Self Certification.

WECC, NERC and other appropriate entities; (3) provide appropriate equipment characteristics and system data in compliance with the respective Interconnection-wide Regional dynamics system modeling and simulation data requirements and reporting procedures for small behind-the meter generating facilities; and (4) provide that data as required to WECC, NERC and other appropriate entities. This Notice of Penalty is being filed with the Commission because, based on information from WECC, WECC and UAMP have entered into a Settlement Agreement to resolve all outstanding issues arising from a preliminary and non-public assessment resulting in WECC's determination and findings of the enforceable alleged violations of MOD-010-0 R1, MOD-010-0 R2, MOD-012-0 R1 and MOD-012-0 R2. According to the Settlement Agreement, UAMP neither admits nor denies the alleged violations, but has agreed to the proposed penalty of four thousand dollars (\$4,000) to be assessed to UAMP, in addition to other remedies and actions to mitigate the instant violations and facilitate future compliance under the terms and conditions of the Settlement Agreement. Accordingly, the alleged violations identified as NERC Violation Tracking Identification Numbers WECC200801130, WECC200801131, WECC200801132 and WECC200801134 are being filed in accordance with the NERC Rules of Procedure and the CMEP.

Statement of Findings Underlying the Alleged Violations

This Notice of Penalty incorporates the findings and justifications set forth in the Settlement Agreement executed on June 16, 2009, by and between WECC and UAMP, which is included as Attachment b. The details of the findings and basis for the penalty are set forth in the Settlement Agreement and herein. This Notice of Penalty filing contains the basis for approval of the Settlement Agreement by the NERC Board of Trustees Compliance Committee (NERC BOTCC). 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 alleged violation of a Reliability Standard resolved by the Settlement Agreement, as discussed in greater detail below.

Region	Registered Entity	NOC ID	NERC Violation ID	Reliability Std.	Req. (R)	VRF	Total Penalty (\$)
WECC	Utah Associated Municipal Power Systems	NOC-216	WECC200801130	MOD-010-0	1	Medium ⁶	4,000
WECC	Utah Associated Municipal Power Systems	NOC-216	WECC200801131	MOD-010-0	2	Medium ⁷	
WECC	Utah Associated Municipal Power Systems	NOC-216	WECC200801132	MOD-012-0	1	Medium	

⁶ When NERC filed Violation Risk Factors (VRFs) it originally assigned MOD-010-0 R1 a Lower VRF. The Commission approved the VRF as filed; however, it directed NERC to submit modifications. NERC submitted the modified Medium VRF and on August 6, 2007, the Commission approved the modified Medium VRF. Therefore, the Lower VRF for MOD-010-0 R1 was in effect from June 18, 2007 until August 6, 2007 when the Medium VRF became effective.

⁷ When NERC filed VRFs it originally assigned MOD-010-0 R2 a Lower VRF. The Commission approved the VRF as filed; however, it directed NERC to submit modifications. NERC submitted the modified Medium VRF and on August 6, 2007, the Commission approved the modified Medium VRF. Therefore, the Lower VRF for MOD-010-0 R2 was in effect from June 18, 2007 until August 6, 2007 when the Medium VRF became effective.

WECC	Utah Associated Municipal Power Systems	NOC-216	WECC200801134	MOD-012-0	2	Medium	
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The purpose of Reliability Standards MOD-010-0 and MOD-012-0 is to establish consistent data requirements, reporting procedures, and system models to be used in the analysis of the reliability of the Interconnected Transmission Systems.

MOD-010-0

MOD-010-0 R1 requires an entity, such as UAMP,⁸ to provide appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-011-0 R1.

MOD-010-0 R2 requires that this steady-state modeling and simulation data be provided to the Regional Entities, NERC, and those entities specified within Reliability Standard MOD-011-0 R1. If no schedule exists, then the entity shall provide the data on request (30 calendar days). MOD-010-0 R1 and R2 each have a “Medium” Violation Risk Factor (VRF).

On July 10, 2008, UAMP self-certified a possible violation of MOD-010-0 because, after an internal review, UAMP could not confirm that all of its members with behind-the-meter facilities were reporting their steady-state data required by this Standard. Consequently, because UAMP could not confirm that all of its members with behind-the-meter facilities were reporting their dynamics system data, UAMP and its Balancing Authority, PacifiCorp, could not confirm that the small generation facilities located behind-the-meter on the 10 MW or above netting criteria level were submitting the required data and were being modeled in the WECC modeling database. WECC subject matter experts reviewed the information in UAMP's Self-Certification on December 5, 2008 and concluded that UAMP had possibly violated MOD-010-0.

After reviewing the evidence, WECC Enforcement Staff concluded that there was an alleged violation of MOD-010-0 R1 and R2 and that the duration of the alleged violation was from June 18, 2007, when the standard became enforceable, through December 29, 2008, when UAMP completed its Mitigation Plan.⁹

MOD-012-0

MOD-012-0 R1 requires an entity, such as UAMP,¹⁰ to provide appropriate equipment characteristics and system data in compliance with the respective Interconnection-wide Regional dynamics system modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-013-0 R1.

⁸ As specified in the data requirements and reporting procedures of MOD-011-0 R1.

⁹ The Settlement Agreement incorrectly states that UAMP had allegedly violated MOD-010-0 R1 and R2 from March 11, 2008 through December 29, 2008.

¹⁰ As specified in the data requirements and reporting procedures of MOD-013-0 R1.

MOD-012-0 R2 requires that dynamics system modeling and simulation data be provided to its Regional Entity(ies), NERC, and those entities specified within the applicable reporting procedures identified in Reliability Standard MOD-013-0 R1. If no schedule exists, then the entity shall provide data on request (30 calendar days). MOD-012-0 R1 and R2 have a “Medium” VRF.

On July 10, 2008, UAMP self-certified a possible violation of MOD-012-0 because, after an internal review, UAMP could not confirm that all of its members with behind-the-meter facilities were reporting their dynamics system data required by this Standard. Consequently, because UAMP could not confirm that all of its members with behind-the-meter facilities were reporting their dynamics system data, UAMP and its Balancing Authority, PacifiCorp, could not confirm that the small generation facilities located behind-the-meter on the 10 MW or above netting criteria level were being modeled in the WECC modeling database. WECC subject matter experts reviewed the information in UAMP's Self-Certification on December 5, 2008 and concluded that UAMP had possibly violated MOD-012-0.

After reviewing the evidence, WECC Enforcement Staff concluded that there was an alleged violation of MOD-012-0 R1 and R2. The duration of the alleged violation was from June 18, 2007, when the standard became enforceable, through December 29, 2008, when UAMP completed its Mitigation Plan.¹¹

Regional Entity's Basis for Penalty

According to the Settlement Agreement, WECC has assessed a penalty of four thousand dollars (\$4,000) for the referenced alleged violations. In reaching this determination, WECC considered the following mitigating factors: (1) there was a minimal risk to the reliability of the bulk power system because the generating facilities missing the required data were small in individual and total group capacity. UAMP failed to provide less than or equal to 25% of the appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling and simulation data requirements and reporting procedures as defined in Reliability Standard; (2) these violations constituted UAMP's first occurrence of non-compliance with the applicable Reliability Standards; (3) UAMP was cooperative throughout WECC's evaluations and enforcement process; and (4) there was no evidence that UAMP's violations were intentional.

After consideration of these and the above factors, WECC determined that, in this instance, the penalty amount of four thousand dollars (\$4,000) is appropriate and bears a reasonable relation to the seriousness and duration of the alleged violations.

¹¹ The Settlement Agreement incorrectly states that UAMP had allegedly violated MOD-012-0 R1 and R2 from March 11, 2008 through December 29, 2008.

Status of Mitigation Plans¹²

MOD-010-0

UAMP's Mitigation Plan to address the alleged violations of MOD-010-0 R1 and R2 was submitted to WECC on July 10, 2008. The Mitigation Plan was accepted by WECC on August 7, 2008 and approved by NERC on December 17, 2008. The Mitigation Plan for these alleged violations is designated as MIT-08-1163 and was submitted as non-public information to FERC on December 17, 2008 in accordance with FERC orders.

UAMP's Mitigation Plan required it to complete a review of all steady-state data in the WECC modeling database to confirm that UAMP and its members' facilities were in the database and that the data was correct by December 31, 2008. Additionally, UAMP was required to provide a progress report by September 30, 2008. On September 30, 2008, UAMP submitted a milestone update form stating its data review was underway and that it would continue to evaluate data in WECC's modeling database and compare it with UAMP's data.

On December 29, 2008, UAMP certified to WECC its completion of the Mitigation Plan. To complete its Mitigation Plan, UAMP had conducted a comprehensive review of its member systems and determined which systems were missing from WECC's database and base cases, and then submitted the missing steady-state modeling and simulation data to its Balancing Authority. The documentation submitted was: (1) E-mail correspondence between PacifiCorp and UAMP regarding member systems modeling for inclusion in WECC models; (2) a list of UAMP Member Generation – Summer and Winter showing the UAMP and UAMP Member's Generation that is modeled; and (3) a description of each system as found in the original base case and modifications to the base case to include or adjust the system

UAMP specific updates to the model:

Member 1: In the modified case, the transformer ratings for the transformers between two buses 65735 and 65901 was adjusted and Member 1's system beyond bus 65901 was modeled. The original load at bus 65901 was set to 0.0 and Member 1's load was distributed into the modeled system.

Member 2: In the modified case, the two transformers serving Member 2 are modeled to serve two separated 46 kV buses; 65206 and 68800. The transformer ratings and impedance for the 138 kV – 46 kV transformers was adjusted and Member 2's 46 kV system and generation beyond the 138 kV - 46 kV transformers was modeled. The original load at bus 65206 was set to 0.0 and Member 2's load was distributed into the modeled system.

Member 3: In the modified case, Member 3's 138 kV system and generation beyond its delivery point is modeled. The original load at bus 66285 was set to 0.0 and Member 3's load was distributed into the modeled system.

¹² See 18 C.F.R. § 39.7(d)(7).

Member 4: In the modified case, Member 4's 46 kV system and generation beyond its delivery point is modeled. The original load at bus 65951 was left as found as it may represent RMP load. Member 4 load was distributed into the modeled system.

Member 5: In the modified case, some of Member 5 system line impedances were modified.

Member 6: In the modified case, Member 5's 138 kV system beyond its delivery point is modeled. The original load at bus 65482 was set to 0.0 and Member 5's load was distributed into the modeled system.

In reviewing UAMP's submitted evidence, WECC determined that all of UAMP's members were represented in the new data and that UAMP's members were submitting the required data to UAMP's Balancing Authority in compliance with MOD-010-0 R1 and R2. UAMP submitted the following evidence in support of its completion:

- E-mail correspondence between PacifiCorp and UAMP regarding member systems modeling for inclusion in WECC models;
- A list of UAMP Member Generation – Summer and Winter showing the UAMP and UAMP Member's Generation that is modeled; and
- a description of each system as found in the original base case and modifications to the base case to include or adjust the system.

On January 5, 2009, WECC subject matter experts reviewed the revised Mitigation Plan and supporting evidence of its completion, and in a letter dated February 18, 2009, WECC verified that the UAMP Mitigation Plan was completed.

MOD-012-0

UAMP's Mitigation Plan to address the alleged violations of MOD-012-0 R1 and R2 was submitted to WECC on July 10, 2008. The Mitigation Plan was accepted by WECC on August 7, 2008 and approved by NERC on December 17, 2008. The Mitigation Plan for these alleged violations is designated as MIT-08-1164 and was submitted as non-public information to FERC on December 17, 2008 in accordance with FERC orders.

UAMP's Mitigation Plan required it to complete a review of all dynamics system data in the WECC modeling database to confirm that UAMP and its members' facilities were in the database and that the data was correct by December 31, 2008. Additionally, UAMP was required to provide a progress report by September 30, 2008. On September 30, 2008, UAMP submitted a milestone update form stating its data review was underway and that it would continue to evaluate data in WECC's modeling database and compare it with UAMP's data.

On December 29, 2008, UAMP certified to WECC its completion of the Mitigation Plan through the submission of its Mitigation Plan Completion Form. To complete the Mitigation Plan, UAMP had conducted a comprehensive review of its member systems and determined which systems were missing from WECC's database and base cases, and then submitted the missing dynamics system modeling and simulation data to its Balancing Authority. WECC determined

that all of UAMP's members were represented in the new data and that UAMP's members were submitting the required data to UAMP's Balancing Authority in compliance with MOD-012-0 R1 and R2. UAMP submitted the following evidence in support of its completion:

- E-mail correspondence between PacifiCorp and UAMP re: member systems modeling for inclusion in WECC models;
- A list of UAMP Member Generation – Summer and Winter showing the UAMP and UAMP Member's Generation that is modeled; and
- a description of each system as found in the original base case and modifications to the base case to include or adjust the system.

On January 5, 2009, WECC subject matter experts reviewed the revised Mitigation Plan and supporting evidence of its completion, and in a letter dated February 18, 2009, WECC verified that the UAMP Mitigation Plan was completed.

Statement Describing the Proposed Penalty, Sanction or Enforcement Action Imposed¹³

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,¹⁴ the NERC BOTCC reviewed the Settlement Agreement and supporting documentation on December 9, 2009. The NERC BOTCC approved the Settlement Agreement, including WECC's imposition of a financial penalty, assessing a penalty of four thousand dollars (\$4,000) against UAMP and other actions to facilitate future compliance required under the terms and conditions of the Settlement Agreement. In approving the Settlement Agreement, the NERC BOTCC reviewed the applicable requirements of the Commission-approved Reliability Standards and the underlying facts and circumstances of the alleged violations at issue.

In reaching this determination, the NERC BOTCC considered the following factors:

- (1) there was a minimal risk to the reliability of the bulk power system because the generating facilities missing the required data were small in individual and total group capacity;
- (2) UAMP failed to provide less than or equal to 25% of the appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling and simulation data requirements and reporting procedures;
- (3) these violations constituted UAMP's first occurrence of non-compliance with the applicable Reliability Standards;
- (4) UAMP self-reported the violations; and
- (5) WECC reported UAMP was cooperative throughout WECC's evaluations and enforcement process.

¹³ See 18 C.F.R. § 39.7(d)(4).

¹⁴ *North American Electric Reliability Corporation*, "Guidance Order on Reliability Notices of Penalty," 124 FERC ¶ 61,015 (2008).

For the foregoing reasons, the NERC BOTCC approves the Settlement Agreement and believes that the proposed penalty of four thousand dollars (\$4,000) is appropriate for the violations and circumstances in question, and is consistent with NERC's goal to promote and ensure reliability of the bulk power system.

Pursuant to Order No. 693, the penalty will be effective upon expiration of the 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.

Attachments to be Included as Part of this Notice of Penalty

The attachments to be included as part of this Notice of Penalty are the following documents and material:

- a) WECC's Self-Certified Review Worksheets dated December 5, 2008, included as Attachment a;
- b) Settlement Agreement by and between UAMP and WECC executed June 16, 2009, included as Attachment b;
- c) UAMP's Mitigation Plans MIT-08-1163 and MIT-08-1164 submitted July 10, 2008, included as Attachment c;
- d) UAMP's Certifications of Completion of the Mitigation Plans dated December 29, 2008, included as Attachment d; and
- e) WECC's Verifications of Completion of the Mitigation Plans dated February 18, 2009, included as Attachment e.

A Form of Notice Suitable for Publication¹⁵

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

¹⁵ 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:

<p>Gerald W. Cauley President and Chief Executive Officer David N. Cook* Vice President and General Counsel North American Electric Reliability Corporation 116-390 Village Boulevard Princeton, N.J. 08540-5721 (609) 452-8060 (609) 452-9550 – facsimile gerry.cauley@nerc.net david.cook@nerc.net</p> <p>Marshall Empey* Manager – Operations and Planning Utah Associated Municipal Power Systems 2825 E Cottonwood Parkway, Suite 200 Salt Lake City, UT 84121 (801) 327-6605 (801) 561-2687 – facsimile Marshall@uamps.com</p> <p>Western Electricity Coordinating Council 615 Arapeen Drive, Suite 210 Salt Lake City, UT 84108-1262 Christopher Luras* Manager of Compliance Enforcement (801) 883-6887 (801) 883-6894 – facsimile CLuras@wecc.biz</p> <p>*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.</p>	<p>Rebecca J. Michael* Assistant General Counsel Holly A. Hawkins* Attorney North American Electric Reliability Corporation 1120 G Street, N.W. Suite 990 Washington, D.C. 20005-3801 (202) 393-3998 (202) 393-3955 – facsimile rebecca.michael@nerc.net holly.hawkins@nerc.net</p> <p>Western Electricity Coordinating Council 615 Arapeen Drive, Suite 210 Salt Lake City, UT 84108-1262</p> <p>Louise McCarren* Chief Executive Officer (801) 883-6868 (801) 582-3918 – facsimile Louise@wecc.biz</p> <p>Steven Goodwill* Associate General Counsel (801) 883-6857 (801) 883-6894 – facsimile SGoodwill@wecc.biz</p> <p>Constance White* Vice President of Compliance (801) 883-6885 (801) 883-6894 – facsimile CWhite@wecc.biz</p>
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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

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cc: Utah Associated Municipal Power Systems
Western Electricity Coordinating Council

Attachments

Attachment a

WECC's Self-Certified Review Worksheets dated December 5, 2008



Self-Reported Violation Review Worksheet

If a self report is retrieved from the entity records and is accepted, save to directory where SR was found. W:\04.01 - entity - registered entity records.

If self report is retrieved from the "needs reviewed" folder and is accepted, save to W:\06.00 - Data Processing - Compliance Violations_Mitigation Plans – Reviewed.

If any self report requirement is dismissed, save to W:\06.00 - Data Processing - Compliance Violations_Mitigation Plans - Reviewed, and notify Chad Murdock & Godfrey Capiral.

Reviewed By:	Jay Looock
Date Reviewed:	12/05/2008
Date SRV Submitted:	07/10/2008
Accepted or Rejected:	ACCEPTED R1, R2
Registered Entity Name:	Utah Associated Municipal Power Systems - UAMP
Registered Functions:	GOP, GO, PSE, RP
Standard Title:	Steady-State Data for Modeling and Simulation of the Interconnected Transmission System
Standard Number:	MOD-010
Requirement Number(s) ¹ :	R1, R2

1. Is the standard and/or requirement applicable to the Registered Entity?

YES/NO:	Y
Notes:	

2. Was the standard in effect on the day of the violation?

YES/NO:	Y
Notes:	

3. Does the entity's violation description correspond with the requirement?

YES/NO:	Y
Notes:	

4. Was a Mitigation Plan submitted along with the Self-Report?

YES/NO:	Y
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¹ Violations are reported at the level of requirements, sub requirements are not necessary

Notes:	If YES... ✓ Please review the corresponding Mitigation Plan
	Mitigation Plan was accepted on 8/07/2008

	Introduction – Summary Findings
R1	The reviewer concluded that based on documentation that UAMP was in violation of Requirement 1 of MOD-010

	Factual Linkage
R1	UAMP determined that its members with behind-the-meter facilities may not be reporting their steady-state data. UAMP or their BA (PAC) cannot confirm with 100% certainty that all facilities are currently being modeled in the WECC base cases.

	Detailed Discussion of Evidence
R1	UAMP concern is the small generation facilities located behind-the-meter that are on the 10MW or above netting criteria level. UAMP recognizes the need to implement a complete review of all data in the WECC base cases (modeling database) to confirm and possibly identify data issues.

	Conclusion
R1	UAMP is not compliant with R1 of the MOD-010 standard.

	Duration of Violation
R1	June 18, 2007, until a completed mitigation plan is accepted by WECC compliance.

	Violation Risk Factor
R1	Medium

	Violation Severity Level
R1	Lower - UAMP failed to provide less than or equal to 25% of the appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-011-0, R1 .

	Technical or Documentation Issue
R1	Technical Issue

	Reliability Impact Statement
R1	This is a Minimal reliability issue to the BES due to size of the generators behind-the-meters that are currently being netted or left out of the WECC base cases.

	Other Relevant Information
R1	This review was crafted by Jay Loock on December 5, 2008.

	Introduction – Summary Findings
R2	The reviewer concluded that based on documentation that UAMP was in violation of Requirement 2 of MOD-010

	Factual Linkage
R2	UAMP determined that its members with behind-the-meter facilities may not be reporting their steady-state data. UAMP or their BA (PAC) cannot confirm with 100% certainty that all facilities are currently being modeled in the WECC base cases.

	Detailed Discussion of Evidence
R2	UAMP concern is the small generation facilities located behind-the-meter that are on the 10MW or above netting criteria level. UAMP recognizes the need to implement a complete review of all data in the WECC base cases (modeling database) to confirm and possibly identify data issues.

	Conclusion
R2	UAMP is not compliant with R2 of the MOD-010 standard.

	Duration of Violation
R2	June 18, 2007, until a completed mitigation plan is accepted by WECC compliance.

	Violation Risk Factor
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R2	Medium
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	Violation Severity Level
R2	Lower - UAMP failed to provide less than or equal to 25% of the appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-011-0, R1 .

	Technical or Documentation Issue
R2	Technical Issue

	Reliability Impact Statement
R2	This is a Minimal reliability issue to the BES due to size of the generators behind-the-meters that are currently being netted or left out of the WECC base cases.

	Other Relevant Information
R2	This review was crafted by Jay Loock on December 5, 2008.



Self-Reported Violation Review Worksheet

If a self report is retrieved from the entity records and is accepted, save to directory where SR was found. W:\04.01 - entity - registered entity records.

If self report is retrieved from the "needs reviewed" folder and is accepted, save to W:\06.00 - Data Processing - Compliance Violations_Mitigation Plans – Reviewed.

If any self report requirement is dismissed, save to W:\06.00 - Data Processing - Compliance Violations_Mitigation Plans - Reviewed, and notify Chad Murdock & Godfrey Capiral.

Reviewed By:	Jay Looock
Date Reviewed:	12/05/2008
Date SRV Submitted:	07/10/2008
Accepted or Rejected:	ACCEPTED R1, R2
Registered Entity Name:	Utah Associated Municipal Power Systems - UAMP
Registered Functions:	GOP, GO, PSE, RP
Standard Title:	Dynamics Data for Modeling and Simulation of the Interconnected Transmission System
Standard Number:	MOD-012
Requirement Number(s) ¹ :	R1, R2

1. Is the standard and/or requirement applicable to the Registered Entity?

YES/NO:	Y
Notes:	

2. Was the standard in effect on the day of the violation?

YES/NO:	Y
Notes:	

3. Does the entity's violation description correspond with the requirement?

YES/NO:	Y
Notes:	

4. Was a Mitigation Plan submitted along with the Self-Report?

YES/NO:	Y
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¹ Violations are reported at the level of requirements, sub requirements are not necessary

Notes:	If YES... ✓ Please review the corresponding Mitigation Plan
	Mitigation Plan was accepted on 8/07/2008

	Introduction – Summary Findings
R1	The reviewer concluded that based on documentation that UAMP was in violation of Requirement 1 of MOD-012

	Factual Linkage
R1	UAMP determined that its members with behind-the-meter facilities may not be reporting their steady-state data. UAMP or their BA (PAC) cannot confirm with 100% certainty that all facilities are currently being modeled in the WECC base cases.

	Detailed Discussion of Evidence
R1	UAMP concern is the small generation facilities located behind-the-meter that are on the 10MW or above netting criteria level. UAMP recognizes the need to implement a complete review of all data in the WECC base cases (modeling database) to confirm and possibly identify data issues.

	Conclusion
R1	UAMP is not compliant with R1 of the MOD-012 standard.

	Duration of Violation
R1	June 18, 2007, until a completed mitigation plan is accepted by WECC compliance.

	Violation Risk Factor
R1	Medium

	Violation Severity Level
R1	Lower - UAMP failed to provide less than or equal to 25% of the appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-011-0, R1 .

	Technical or Documentation Issue
R1	Technical Issue

	Reliability Impact Statement
R1	This is a Minimal reliability issue to the BES due to size of the generators behind-the-meters that are currently being netted or left out of the WECC base cases.

	Other Relevant Information
R1	This review was crafted by Jay Loock on December 5, 2008.

	Introduction – Summary Findings
R2	The reviewer concluded that based on documentation that UAMP was in violation of Requirement 2 of MOD-012.

	Factual Linkage
R2	UAMP determined that its members with behind-the-meter facilities may not be reporting their steady-state data. UAMP or their BA (PAC) cannot confirm with 100% certainty that all facilities are currently being modeled in the WECC base cases.

	Detailed Discussion of Evidence
R2	UAMP concern is the small generation facilities located behind-the-meter that are on the 10MW or above netting criteria level. UAMP recognizes the need to implement a complete review of all data in the WECC base cases (modeling database) to confirm and possibly identify data issues.

	Conclusion
R2	UAMP is not compliant with R2 of the MOD-012 standard.

	Duration of Violation
R2	June 18, 2007, until a completed mitigation plan is accepted by WECC compliance.

	Violation Risk Factor
--	------------------------------

R2	Medium
----	--------

	Violation Severity Level
R2	Lower - UAMP failed to provide less than or equal to 25% of the appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-011-0, R1 .

	Technical or Documentation Issue
R2	Technical Issue

	Reliability Impact Statement
R2	This is a Minimal reliability issue to the BES due to size of the generators behind-the-meters that are currently being netted or left out of the WECC base cases.

	Other Relevant Information
R2	This review was crafted by Jay Loock on December 5, 2008.

Attachment b

Settlement Agreement by and between UAMPS and WECC executed June 16, 2009

SETTLEMENT AGREEMENT
OF
WESTERN ELECTRICITY COORDINATING COUNCIL
AND
UTAH ASSOCIATED MUNICIPAL POWER SYSTEMS

The Western Electricity Coordinating Council ("WECC") and Utah Associated Municipal Power Systems ("UAMPS") (collectively, the "Parties") hereby enter into this Settlement Agreement ("Agreement") on this 16 day of June, 2009.

RECITALS

A. The Parties desire to enter into this Agreement to resolve all outstanding issues between them arising from a non-public assessment of UAMPS by WECC that resulted in certain WECC determinations and findings regarding four alleged UAMPS violations of the following North American Electric Reliability Corporation ("NERC") Reliability Standards ("Reliability Standards"):

MOD-010-0 Requirements 1 and 2: *Steady-State Data for Modeling and Simulation of the Interconnected Transmission System*

MOD-012-0 Requirements 1 and 2: *Dynamics Data for Modeling and Simulation of the Interconnected Transmission System*

B. UAMPS provides wholesale electric energy on a nonprofit basis to community-owned power systems. UAMPS is a political subdivision of the State of Utah. UAMPS represents 53 member utilities in Utah, Arizona, California, Idaho, Nevada, New Mexico, Oregon and Wyoming. On June 17, 2007, UAMPS was registered on the NERC Compliance Registry as a Generator Operator, Generator Owner and Purchasing-Selling Entity. On March 11, 2008, UAMPS was registered on the NERC Compliance Registry as a Resource Planner.

C. WECC was formed on April 18, 2002, by the merger of the Western Systems Coordinating Council, Southwest Regional Transmission Association, and the Western Regional Transmission Association. WECC is one of eight Regional Entities in the United States responsible for coordinating and promoting electric system reliability. In addition, WECC supports efficient competitive power markets, assures open and non-discriminatory transmission access among members, provides a forum for resolving transmission access disputes, and provides an environment for coordinating the operating and planning activities of its members. WECC's region encompasses a vast area of nearly 1.8 million square miles extending from Canada to Mexico and including all or part of 14 western states. It is the largest and most diverse of the eight regional entities in the United States.

D. The Parties are entering into this Agreement to settle the disputed matters between them. It is in the Parties' and the public's best interests to resolve this matter efficiently without the delay and burden associated with a contested proceeding. Nothing contained in this Agreement shall limit or prevent WECC from evaluating UAMPS for subsequent violations of

the same Reliability Standards addressed herein and taking enforcement action, if necessary. Such enforcement action may include assessing penalties against UAMPS for subsequent violations of the Reliability Standards addressed herein in accordance with the NERC Rules of Procedure.

NOW, THEREFORE, in consideration of the terms set forth herein, including in the Recitals, WECC and UAMPS hereby agree and stipulate to the following.

I. Representations of the Parties

For the purposes of this Agreement, UAMPS does not contest the facts set forth herein. UAMPS stipulates to the Confirmed Violations, as this term is defined in the WECC Compliance Monitoring and Enforcement Program ("CMEP"), of the Reliability Standards described below and in detail.

WECC has established sufficient facts, as set forth herein, to support this determination that UAMPS has Confirmed Violations of the Reliability Standards described below in detail.

II. Confirmed Violations

A. NERC Reliability Standard MOD-010-0 Requirement 1

R. 1: *The Transmission Owners, Transmission Planners Generator Owners, and Resource Planners (specified in the data requirements and reporting procedures of MOD-011-0_R1) shall provide appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-011-0_R1.*

NERC Reliability Standard MOD-010-0 is applicable to Transmission Owners, Transmission Planners, Generator Owners and Resource Planners. UAMPS is subject to this Standard because it was registered as a Generation Owner on June 17, 2007 and as a Resource Planner on March 11, 2008.

On July 10, 2008, UAMPS self-reported a possible violation of this Standard. UAMPS determined that it could not confirm with certainty that all of its members with behind-the-meter facilities were reporting the data required by this Standard. WECC subject matter experts ("SMEs") reviewed the information in UAMPS's self-report on December 5, 2008 and concluded that UAMPS had possibly violated this Standard. They forwarded this information to the WECC Enforcement Department ("Enforcement") for its review and consideration.

Enforcement reviewed the SME's findings and the UAMPS self-report. This Standard requires UAMPS to provide appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-011-0 R1. UAMPS could not confirm that it was providing the modeling data for its small generation facilities located behind-the-meter, at or above the 10MW netting criteria level, in accordance with the requirements of Standard MOD-011-0 R1. As a result of its independent review, Enforcement concluded that UAMPS was in violation of MOD-010-0 R1.

On July 10, 2008, UAMPS submitted a mitigation plan to address this violation. This mitigation plan had an expected completion date of December 31, 2008. This plan included the following milestone: "Complete by 9/30/2008: Update WECC with progress regarding its modeling database".

WECC reviewed this mitigation plan on August 7, 2008 and concluded that it addressed the necessary steps to bring UAMPS into compliance with MOD-010-0 R1. Therefore, WECC accepted this mitigation plan on August 7, 2008.

On September 30, 2008, UAMPS submitted a milestone update form stating its data review was underway. UAMPS also stated it would continue to evaluate data in WECC's model and compare it with UAMPS's data. On December 29, 2008, UAMPS submitted its completed mitigation plan. To complete the mitigation plan, UAMPS undertook a comprehensive review of its member systems and determined which systems were missing from WECC's database and base cases. UAMPS submitted the missing data to its Area Coordinator. WECC verified that all of UAMPS's members were represented in the new data and that UAMPS's members were submitting the required data to UAMPS's Area Coordinator. WECC reviewed and accepted UAMPS's completed mitigation plan on January 5, 2009. UAMPS was in violation of MOD-010-0 R1 from March 11, 2008 until December 29, 2008.

B. NERC Reliability Standard MOD-010-0 Requirement 2

R. 2: *The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners (specified in the data requirements and reporting procedures of MOD-011-0 R1) shall provide this steady-state modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standard MOD-011-0 R1. If no schedule exists, then these entities shall provide the data on request (30 calendar days).*

NERC Reliability Standard MOD-010-0 is applicable to Transmission Owners, Transmission Planners, Generator Owners and Resource Planners. UAMPS is subject to this Standard because it was registered as a Generation Owner on June 17, 2007 and as a Resource Planner on March 11, 2008.

On July 10, 2008, UAMPS self-reported a possible violation of this Standard. UAMPS determined that it could not confirm with certainty that all of its members with behind-the-meter facilities were reporting their steady-state modeling and simulation data. WECC SMEs reviewed the information in UAMPS's self-report on December 5, 2008 and concluded that UAMPS had possibly violated this Standard. They forwarded this information to Enforcement for its review and consideration.

Enforcement reviewed the SME's findings and the UAMPS self-report. Requirement 2 of this Standard requires UAMPS to provide the steady-state modeling and simulation data to Regional Reliability Organizations, NERC, and those entities specified within Reliability Standard MOD-011-0 R1. UAMPS could not verify that it had provided the required steady-state modeling and simulation data for its small generation facilities to WECC or the other entities specified in the Standard. Therefore, Enforcement concluded that UAMPS was in violation of MOD-010-0 R1.

On July 10, 2008, UAMPS submitted a mitigation plan to address this violation. This mitigation plan had an expected completion date of December 31, 2008. This plan included the following milestone: "Complete by 9/30/2008: Update WECC with progress regarding its modeling database".

WECC reviewed this mitigation plan on August 7, 2008 and concluded that it addressed the necessary steps to bring UAMPS into compliance with MOD-010-0 R2. As a result, WECC accepted this mitigation plan on August 7, 2008.

On September 30, 2008, UAMPS submitted a milestone update form stating its data review was underway. UAMPS also stated it would continue to evaluate data in WECC's model and compare it with UAMPS's data. On December 29, 2008, UAMPS submitted its completed mitigation plan. As part of its plan, UAMPS undertook a comprehensive review of its member systems and determined which systems were missing from WECC's database and base cases. Then UAMPS submitted the missing data to its Regional Reliability Organization. WECC verified that all of UAMPS's members were represented in the new data and that UAMPS submitted the required data to its Regional Reliability Organization. WECC reviewed and accepted UAMPS's completed mitigation plan on January 5, 2009. UAMPS was in violation of MOD-010-0 R2 from March 11, 2008 until December 29, 2008.

C. NERC Reliability Standard MOD-012-0 Requirement 1

R. 1: *The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners (specified in the data requirements and reporting procedures of MOD-013-0_R1) shall provide appropriate equipment characteristics and system data in compliance with the respective Interconnection-wide Regional dynamics system modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-013-0_R1.*

NERC Reliability Standard MOD-012-0 is applicable to Transmission Owners, Transmission Planners, Generator Owners and Resource Planners. UAMPS is subject to this Standard because it was registered as a Generation Owner on June 17, 2007 and as a Resource Planner on March 11, 2008.

On July 10, 2008, UAMPS self-reported a possible violation of this Standard. UAMPS determined that it could not confirm with certainty that all of its members with behind-the-meter facilities were reporting their dynamic data. WECC SMEs reviewed the information in UAMPS's self-report on December 5, 2008, and concluded that UAMPS had possibly violated this Standard. They forwarded this information to Enforcement for its review and consideration.

Enforcement reviewed the SME's findings and the UAMPS self-report. MOD-012-0 R1 requires UAMPS to provide appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection-wide Regional dynamics system modeling and simulation data requirements and reporting procedures as defined in the Standard. UAMPS could not verify that it had provided the required data for its small generation facilities located behind-the-meter, at or above the 10 MW netting criteria level, in accordance with the requirements of MOD-013-0 R1. As a result, Enforcement concluded that UAMPS was in violation of this Standard.

On July 10, 2008, UAMPS submitted a mitigation plan to address this violation. This mitigation plan had an expected completion date of December 31, 2008. This plan included the following milestone: “Complete by 9/30/2008: Update WECC with progress regarding its modeling database”.

WECC reviewed this mitigation plan on August 7, 2008 and concluded it addressed the necessary steps to bring UAMPS into compliance with MOD-012-0 R1. Therefore, WECC accepted this mitigation plan on August 7, 2008.

On September 30, 2008, UAMPS submitted a milestone update form stating its data review was underway. UAMPS also stated it would continue to evaluate data in WECC’s model and compare it with UAMPS’s data. On December 29, 2008, UAMPS submitted its completed mitigation plan. As part of its mitigation plan, UAMPS undertook a comprehensive review of its member systems and determined which systems were missing from WECC’s database and base cases. UAMPS submitted the missing data to its Regional Reliability Organization. WECC verified that all of UAMPS’s members were represented in the new data and that UAMPS submitted the required data to its Regional Reliability Organization. WECC reviewed and accepted UAMPS’s completed mitigation plan on January 5, 2009. UAMPS was in violation of MOD-012-0 R1 from March 11, 2008 until December 29, 2008.

D. NERC Reliability Standard MOD-012-0 Requirement 2

R. 2: *The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners (specified in the data requirements and reporting procedures of MOD-013-0 R1) shall provide dynamics system modeling and simulation data to its Regional Reliability Organization(s), NERC, and those entities specified within the applicable reporting procedures identified in Reliability Standard MOD-013-0 R1. If no schedule exists, then these entities shall provide data on request (30 calendar days).*

NERC Reliability Standard MOD-012-0 is applicable to Transmission Owners, Transmission Planners, Generator Owners and Resource Planners. UAMPS is subject to this Standard because it was registered as a Generation Owner on June 17, 2007 and as a Resource Planner on March 11, 2008.

On July 10, 2008, UAMPS self-reported a possible violation of this Standard. UAMPS determined that it could not confirm with certainty that all of its members with behind-the-meter facilities were reporting their dynamic systems modeling and simulation data. WECC SMEs reviewed the information in UAMPS’s self-report on December 5, 2008, and concluded that UAMPS had possibly violated this Standard. They forwarded this information to Enforcement for its review and consideration.

Enforcement reviewed the SME’s findings and the UAMPS self-report. MOD-012-0 R2 requires UAMPS to provide the dynamic systems modeling and simulation data to Regional Reliability Organizations, NERC, and the other entities specified in Reliability Standard MOD-013-0 R1. UAMPS could not verify that it had provided the required data for its small generation facilities in accordance with the requirements of Standard MOD-013-0 R1. Therefore, Enforcement concluded UAMPS was in violation of MOD-012-0 R2.

On July 10, 2008, UAMPS submitted a mitigation plan to address this violation. This mitigation plan had an expected completion date of December 31, 2008. This plan included the following milestone: "Complete by 9/30/2008: Update WECC with progress regarding its modeling database".

WECC reviewed this mitigation plan on August 7, 2008 and concluded that it addressed the necessary steps to bring UAMPS into compliance with MOD-012-0 R2. Therefore, WECC accepted this mitigation plan on August 7, 2008.

On September 30, 2008, UAMPS submitted a milestone update form stating its data review was underway. UAMPS also stated it would continue to evaluate data in WECC's model and compare it with UAMPS's data. On December 29, 2008, UAMPS submitted its completed mitigation plan. As part of its mitigation plan, UAMPS undertook a comprehensive review of its member systems and determined which systems were missing from WECC's database and base cases. UAMPS submitted the missing data to its Regional Reliability Organization. WECC verified that all of UAMPS's members were represented in the new data and that UAMPS submitted the required data to its Regional Reliability Organization. WECC reviewed and accepted UAMPS's completed mitigation plan on January 5, 2009. UAMPS was in violation of MOD-012-0 R2 from March 11, 2008 until December 29, 2008.

III. Settlement Terms

A. Payment. To settle this matter, UAMPS hereby agrees to pay \$4,000.00 to WECC via wire transfer or cashier's check. UAMPS shall make the funds payable to a WECC account identified in a Notice of Payment that WECC will send to UAMPS upon approval of this Agreement by NERC and the Federal Energy Regulatory Commission ("FERC"). UAMPS shall issue the payment to WECC no later than twenty days after receipt of the Notice of Payment.

The terms of this Agreement, including the agreed upon payment, are subject to review and possible revision by NERC and FERC. Upon NERC approval of the Agreement, NERC will file a Notice of Penalty with FERC. If FERC approves the Agreement, NERC will post the Agreement publicly. If either NERC or FERC rejects the Agreement, then WECC will attempt to negotiate a revised settlement agreement with UAMPS that includes any changes to the Agreement specified by NERC or FERC. If the Parties cannot reach a settlement agreement, the CMEP governs the enforcement process.

B. Payment Rationale. WECC's determination of penalties in an enforcement action is guided by the statutory requirement codified at 16 U.S.C. § 824o(e)(6) that any penalty imposed "shall bear a reasonable relation to the seriousness of the violation and shall take into consideration the efforts of such user, owner, or operator to remedy the violation in a timely manner". Additionally, WECC considers the guidance provided by the NERC Sanction Guidelines and by FERC in Order No. 693 and in its July 3, 2008 Guidance Order on Reliability Notices of Penalty.

Specifically, to determine penalty assessment, WECC considers the following factors: (1) the seriousness of the violation, including the applicable Violation Risk Factor and Violation Severity Level, and the risk to the reliability of the Bulk Power System ("BPS"); (2) the violation's duration; (3) the Registered Entity's compliance history; (4) the Registered Entity's self-reports and voluntary corrective action; (5) the degree and quality of cooperation by the

Registered Entity in the audit or investigation process, and in any remedial action; (6) the quality of the Registered Entity's compliance program; (7) any attempt by the Registered Entity to conceal the violation or any related information; (8) whether the violation was intentional; (9) any other relevant information or extenuating circumstances; and (10) the Registered Entity's ability to pay a penalty.

To reach an agreement with UAMPS in this action, WECC considered the seriousness of each violation, including the applicable Violation Risk Factors. The Violation Risk Factor for each of UAMPS's Alleged Violations is "Medium". WECC determined that UAMPS's alleged violations posed a minimal risk to the reliability of the BPS because although UAMPS could not confirm that its members had provided the required data for some small generation facilities in accordance with the requirements of the applicable Reliability Standards, those facilities were very small in terms of individual capacity and in terms of total group capacity.

In addition to the factors listed above, WECC considered several mitigating factors to reach an agreement with UAMPS regarding the payment amount. First, the Alleged Violations addressed by this Agreement are UAMPS's first assessed noncompliance with the applicable Reliability Standards. Second, UAMPS self-reported the violations. Third, UAMPS mitigated the violations. Fourth, UAMPS was cooperative throughout WECC's evaluation of the company's compliance with the Reliability Standards and the enforcement process.

Finally, in reaching this Agreement, WECC considered that there were no aggravating factors warranting a higher payment amount. Specifically, UAMPS did not have any negative compliance history. There was no failure by UAMPS to comply with applicable compliance directives, nor any evidence of an attempt by UAMPS to conceal a violation. Finally, there was no evidence that UAMPS's violations were intentional.

IV. Additional Terms

A. Authority. The undersigned representative of each party warrants that he or she is authorized to represent and bind the designated party.

B. Representations. The undersigned representative of each party affirms that he or she has read the Agreement, that all matters set forth in the Agreement are true and correct to the best of his or her knowledge, information, or belief, and that he or she understands that the Agreement is entered into by each party in express reliance on the representations set forth herein.

C. Review. Each party agrees that it has had the opportunity to consult with legal counsel regarding the Agreement and to review it carefully. Each party enters the Agreement voluntarily. No tender, offer or promise of any kind outside the terms of the Agreement by any member, employee, officer, director, agent, or representative of UAMPS or WECC has been made to induce the signatories or the Parties to enter into the Agreement.

D. Entire Agreement. The Agreement represents the entire agreement between the Parties. No oral representations shall be considered a part of the Agreement.

E. Effective Date. The Agreement shall become effective upon FERC's approval of the Agreement by order or operation of law.

F. Waiver of Right to Further Proceedings. UAMPS agrees that the Agreement, upon approval by NERC and FERC, is a final settlement of all matters set forth herein. UAMPS waives its right to further hearings and appeal, unless and only to the extent that UAMPS contends that any NERC or FERC action concerning the Agreement contains one or more material modifications to the Agreement.

G. Reservation of Rights. WECC reserves all of its rights to initiate enforcement, penalty or sanction actions against UAMPS in accordance with the Agreement, the CMEP and the NERC Rules of Procedure. In the event that UAMPS fails to comply with any of the terms of this Agreement, WECC shall have the right to pursue enforcement, penalty or sanction actions against UAMPS up to the maximum penalty allowed by the NERC Rules of Procedure. UAMPS shall retain all of its rights to defend against such enforcement actions in accordance with the CMEP and the NERC Rules of Procedure. Failure by WECC to enforce any provision hereof on occasion shall not constitute a waiver by WECC of its enforcement rights or be binding on WECC on any other occasion.

H. Amendments. Any amendments to the Agreement shall be in writing. No amendment to the Agreement shall be effective unless it is in writing and executed by the Parties.

I. Successors and Assigns. The Agreement shall be binding on successors or assigns of the Parties.

J. Governing Law. The Agreement shall be governed by and construed under the laws of the State of Utah.

K. Captions. The Agreement's titles, headings and captions are for the purpose of convenience only and in no way define, describe or limit the scope or intent of the Agreement.

L. Counterparts and Facsimiles. The Agreement may be executed in counterparts, in which case each of the counterparts shall be deemed to be an original. Also, the Agreement may be executed via facsimile, in which case a facsimile shall be deemed to be an original.

[Signature page follows; intentionally left blank]

Agreed to and accepted:

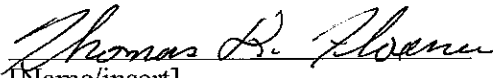
WESTERN ELECTRICITY COORDINATING COUNCIL


Constance B. White

Date: 6/16/09

Title: Vice President of Compliance

UTAH ASSOCIATED MUNICIPAL POWER SYSTEMS


[Name/insert]

Date: 6/16/09

Title: Compliance Director

Attachment c

UAMPS's Mitigation Plans MIT-08-1163 and MIT-08-1164 submitted July 10, 2008



Mitigation Plan Submittal Form

New ☒ or Revised ☐

Date this Mitigation Plan is being submitted: July 10, 2008

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 & Mitigation Plan Requirements

- A.1 Notices and requirements applicable to Mitigation Plans and this Submittal Form are set forth in "Appendix A - Compliance Notices & Mitigation Plan Requirements" to this form. **Review Appendix A and check this box ☒ to indicate that you have reviewed and understand the information provided therein.** This Submittal Form and the Mitigation Plan submitted herein are incomplete and cannot be accepted unless the box is checked.

Section B: Registered Entity Information

- B.1 Identify your organization:

Registered Entity Name: Utah Associated Municipal Power Systems
Registered Entity Address: 2825 E Cottonwood Parkway, Suite 200,
Salt Lake City, Utah 84121
NERC Compliance Registry ID: NCR05445

- B.2 Identify the individual in your organization who will be the Entity Contact regarding this Mitigation Plan. Please see Section 6.2 of the WECC Compliance Monitoring and Enforcement Program (CMEP) for a description of the qualifications required of the Entity Contact.¹

Name: Marshall Empey
Title: Manager - Operations And Planning
Email: marshall@uamps.com

¹ A copy of the WECC CMEP is posted on WECC's website at <http://www.wecc.biz/documents/library/compliance/manuals/Att%20A%20-%20WECC%20CMEP.pdf>. Registered Entities are responsible for following all applicable WECC CMEP procedures. WECC strongly recommends that registered entities become familiar with the WECC CMEP and its requirements, as they may be amended from time to time.



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

This Mitigation Plan is associated with the alleged or confirmed violation(s) of the reliability standard/requirements listed below:

- C.1 Standard: MOD-010-0
[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]	WECC Violation ID # [if known]	Requirement Violated (e.g. R3)	Violation Risk Factor	Alleged or confirmed Violation Date ^(*) (MM/DD/YY)	Method of Detection (e.g. audit, self-report, investigation)
		R1	medium	07/10/2008	self-report
		R2	medium	07/10/2008	self-report

(*) Note: The Alleged or Confirmed Violation Date shall be: (i) the date the violation occurred; (ii) the date that the violation was self-reported; or (iii) the date upon which WECC has deemed the violation to have occurred. Please contact WECC if you have questions regarding which date to use .

- C.3 Identify the cause of the alleged or confirmed violation(s) identified above:

In trying to confirm compliance with our host area coordinator, PacifiCorp, it was determined that all of UAMPS members behind-the-meter facilities may not have been reported. Neither PacifiCorp or UAMPS can confirm with 100% certainty that all facilities are modeled. We feel that most, if not all facilities are in the data, but most questions are on small behind-the-meter generation facilities that may barely exceed the 10 MW netting criteria.

[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 alleged or confirmed violations associated with this Mitigation Plan:



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

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:

UAMPS will complete a review of all data in the WECC modeling database to confirm that UAMPS and its members' facilities are in the database and that the data are correct.

[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 alleged or confirmed violations associated with this Mitigation Plan corrected: 12/31/2008
- D.3 Enter Milestone Activities, with completion dates, that your organization is proposing for this Mitigation Plan:

Milestone Activity	Proposed Completion Date* (milestones cannot be more than 3 months apart)
Progress Report	9/30/2008



(*) Note: Implementation milestones should be no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. As set forth in CMEP section 6.6, adverse consequences could result from failure to complete, on a timely basis, all required actions in this Mitigation Plan, including implementation of milestones. A request for an extension of the completion date of any milestone or of the Mitigation Plan must be received by WECC at least five (5) business days before the relevant milestone or completion date.

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

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:

[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, 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 known, reasonably suspected 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:

[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 organization will incur 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]



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 WECC for acceptance by WECC 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 Manager - Operations and Planning of Utah Associated Municipal Power Systems.
 2. I am an officer, employee, attorney or other person authorized to sign this Mitigation Plan on behalf of Utah Associated Municipal Power Systems.
 3. I understand Utah Associated Municipal Power Systems' obligations to comply with Mitigation Plan requirements and WECC or ERO remedial action directives and I have reviewed the WECC and ERO documents related to these obligations, including, but not limited to, the WECC CMEP and the NERC Rules of Procedure.
 4. I have read and am familiar with the contents of the foregoing Mitigation Plan.
 5. Utah Associated Municipal Power Systems agrees to be bound by, and comply with, the Mitigation Plan, including the timetable completion date, as approved by WECC and approved by NERC.

Authorized Signature:

(Electronic signatures are acceptable; see CMEP Section 3.0)

Name (Print): Marshall Empey
Title: Manager - Operations and Planning
Date: July 10, 2008



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]

Section H: WECC Contact and Instructions for Submission

Please direct any questions regarding completion of this form to:

Mike Wells, Sr. Compliance Engineer

Email: mike@wecc.biz

Phone: (801) 883-6884

For guidance on submitting this form, please refer to the "*WECC Compliance Data Submittal Policy*". This policy can be found on the Compliance Manuals website as Manual 2.12:

<http://www.wecc.biz/wrap.php?file=/wrap/Compliance/manuals.html>



Attachment A – Compliance Notices & Mitigation Plan Requirements

- I. Section 6.2 of the WECC CMEP 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.
 - (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.
- II. This submittal form may be used to provide a required Mitigation Plan for review and approval by WECC and NERC.



Western Electricity Coordinating Council



- III. The Mitigation Plan shall be submitted to the WECC and NERC as confidential information in accordance with Section 9.3 of the WECC CMEP and Section 1500 of the NERC Rules of Procedure.
- IV. This Mitigation Plan form may be used to address one or more related Alleged or Confirmed Violations of one Reliability Standard. A separate Mitigation Plan is required to address violations with respect to each additional Reliability Standard, as applicable.
- V. If the Mitigation Plan is approved by WECC and NERC, a copy of the Mitigation Plan will be provided to the Federal Energy Regulatory Commission in accordance with applicable Commission rules, regulations and orders.
- VI. Either WECC or NERC may reject a Mitigation Plan that it determines to be incomplete or inadequate. If the Mitigation Plan is rejected by either WECC or NERC, the Registered Entity will be notified and required to submit a revised Mitigation Plan.
- VII. In accordance with Section 7.0 of the WECC CMEP, remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.



Mitigation Plan Submittal Form

New ☒ or Revised ☐

Date this Mitigation Plan is being submitted: July 10, 2008

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 & Mitigation Plan Requirements

- A.1 Notices and requirements applicable to Mitigation Plans and this Submittal Form are set forth in "Appendix A - Compliance Notices & Mitigation Plan Requirements" to this form. **Review Appendix A and check this box ☒ to indicate that you have reviewed and understand the information provided therein.** This Submittal Form and the Mitigation Plan submitted herein are incomplete and cannot be accepted unless the box is checked.

Section B: Registered Entity Information

- B.1 Identify your organization:

Registered Entity Name: Utah Associated Municipal Power Systems
Registered Entity Address: 2825 E Cottonwood Parkway, Suite 200,
Salt Lake City, Utah 84121
NERC Compliance Registry ID: NCR05445

- B.2 Identify the individual in your organization who will be the Entity Contact regarding this Mitigation Plan. Please see Section 6.2 of the WECC Compliance Monitoring and Enforcement Program (CMEP) for a description of the qualifications required of the Entity Contact.¹

Name: Marshall Empey
Title: Manager - Operations And Planning
Email: marshall@uamps.com

¹ A copy of the WECC CMEP is posted on WECC's website at <http://www.wecc.biz/documents/library/compliance/manuals/Att%20A%20-%20WECC%20CMEP.pdf>. Registered Entities are responsible for following all applicable WECC CMEP procedures. WECC strongly recommends that registered entities become familiar with the WECC CMEP and its requirements, as they may be amended from time to time.



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

This Mitigation Plan is associated with the alleged or confirmed violation(s) of the reliability standard/requirements listed below:

C.1 Standard: MOD-012-0
[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]	WECC Violation ID # [if known]	Requirement Violated (e.g. R3)	Violation Risk Factor	Alleged or confirmed Violation Date ^(*) (MM/DD/YY)	Method of Detection (e.g. audit, self-report, investigation)
		R1	medium	07/10/2008	self-report
		R2	medium	07/10/2008	self-report

(*) Note: The Alleged or Confirmed Violation Date shall be: (i) the date the violation occurred; (ii) the date that the violation was self-reported; or (iii) the date upon which WECC has deemed the violation to have occurred. Please contact WECC if you have questions regarding which date to use .

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

In trying to confirm compliance with our host area coordinator, PacifiCorp, it was determined that all of UAMPS members behind-the-meter facilities may not have been reported. Neither PacifiCorp or UAMPS can confirm with 100% certainty that all facilities are modeled. We feel that most, if not all facilities are in the data, but most questions are on small behind-the-meter generation facilities that may barely exceed the 10 MW netting criteria.

[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 alleged or confirmed violations associated with this Mitigation Plan:



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

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:

UAMPS will complete a review of all data in the WECC modeling database to confirm that UAMPS and its members' facilities are in the database and that the data are correct.

[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 alleged or confirmed violations associated with this Mitigation Plan corrected: 12/31/2008
- D.3 Enter Milestone Activities, with completion dates, that your organization is proposing for this Mitigation Plan:

Milestone Activity	Proposed Completion Date* (milestones cannot be more than 3 months apart)
Progress Report	9/30/2008



(*) Note: Implementation milestones should be no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. As set forth in CMEP section 6.6, adverse consequences could result from failure to complete, on a timely basis, all required actions in this Mitigation Plan, including implementation of milestones. A request for an extension of the completion date of any milestone or of the Mitigation Plan must be received by WECC at least five (5) business days before the relevant milestone or completion date.

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

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:

[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, 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 known, reasonably suspected 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:

[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 organization will incur 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]



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 WECC for acceptance by WECC 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 Manager - Operations and Planning of Utah Associated Municipal Power Systems.
 2. I am an officer, employee, attorney or other person authorized to sign this Mitigation Plan on behalf of Utah Associated Municipal Power Systems.
 3. I understand Utah Associated Municipal Power Systems' obligations to comply with Mitigation Plan requirements and WECC or ERO remedial action directives and I have reviewed the WECC and ERO documents related to these obligations, including, but not limited to, the WECC CMEP and the NERC Rules of Procedure.
 4. I have read and am familiar with the contents of the foregoing Mitigation Plan.
 5. Utah Associated Municipal Power Systems agrees to be bound by, and comply with, the Mitigation Plan, including the timetable completion date, as approved by WECC and approved by NERC.

Authorized Signature: _____

(Electronic signatures are acceptable; see CMEP Section 3.0)

Name (Print): Marshall Empey

Title: Manager - Operations and Planning

Date: July 10, 2008



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]

Section H: WECC Contact and Instructions for Submission

Please direct any questions regarding completion of this form to:

Mike Wells, Sr. Compliance Engineer

Email: mike@wecc.biz

Phone: (801) 883-6884

For guidance on submitting this form, please refer to the "*WECC Compliance Data Submittal Policy*". This policy can be found on the Compliance Manuals website as Manual 2.12:

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Western Electricity Coordinating Council



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- VII. In accordance with Section 7.0 of the WECC CMEP, remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.

Attachment d

UAMPS's Certifications of Completion of the Mitigation Plans dated December 29, 2008



CONFIDENTIAL

Mitigation Plan Completion Form

Please complete a Mitigation Plan Completion form for each fully mitigated violation and submit to the WECC Compliance Web Portal File Upload along with the supporting evidence that confirms full compliance and Authorized Officer's signature.

Registered Entity Name: UTAH ASSOCIATED MUNICIPAL POWER SYSTEMS

Standard Title: Steady State Data for Transmission System Modeling and Simulation

Standard Number: MOD-010

Requirement Number(s): **R1, R2**

Actual completion date of Mitigation Plan: December 29, 2008

Check this box ☒ to indicate that you understand that the submittal of this Completion form is incomplete and cannot be reviewed for approval unless supporting documentation/evidence that confirms full compliance is attached.

Please provide the specific location (i.e. paragraph numbers, page numbers) in the documentation / evidence submitted to verify compliance.

Attached is zip file with three documents: (1) UAMPS - PacifiCorp Correspondence showing correspondence with PacifiCorp acting in its capacity as Area Coordinator, (2) UAMPS Submittal Description showing what additional data was submitted over what was found to be in the base case data, and (3) UAMPS & UAMPS Member Generation - Summer and Winter showing the UAMPS and UAMPS Member's generation that is modeled.

Additional Notes or Comments pertaining to this violation:

UAMPS self reported a possible violation of the two requirements in this Standard because we could not confirm that all of our member's systems were correctly represented in the WECC database. We reviewed all of our member's systems and determined that there was some missing data and submitted the data to our area coordinator.

By endorsement of this document I attest that Utah Associated Municipal Power Systems is now in full compliance with the standard / requirements addressed in this Mitigation Plan and documentation / evidence supporting full compliance is attached for review and audit by the WECC Compliance Staff.

Authorized Officer's Signature: _____

WECC Compliance Monitoring and Enforcement Program
Mitigation Plan Completion Form

A handwritten signature in black ink, appearing to be 'MPL', is written over a horizontal line that serves as the signature line.

Authorized Officer's Name: Marshall Empey

Authorized Officer's Title: Manager - Operations and Planning

Date: December 29, 2008



CONFIDENTIAL

Mitigation Plan Completion Form

Please complete a Mitigation Plan Completion form for each fully mitigated violation and submit to the WECC Compliance Web Portal File Upload along with the supporting evidence that confirms full compliance and Authorized Officer's signature.

Registered Entity Name: UTAH ASSOCIATED MUNICIPAL POWER SYSTEMS

Standard Title: Dynamics Data for Transmission System Modeling and Simulation

Standard Number: MOD-012

Requirement Number(s): **R1, R2**

Actual completion date of Mitigation Plan: December 29, 2008

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Authorized Officer's Signature: _____

A handwritten signature in black ink, appearing to be 'M. J. Long', is written over a horizontal line.

Authorized Officer's Name: Marshall Empey

Authorized Officer's Title: Manager - Operations and Planning

Date: December 29, 2008

Attachment e

WECC's Verifications of Completion of the Mitigation Plans dated February 18, 2009

CONFIDENTIAL



Bob Kiser
Manager of Compliance Audits and Investigations

360.567.4058
bkiser@wecc.biz

February 18, 2009

Marshall Empey
Manager Operations and Planning
Utah Associated Municipal Power Systems
NCR05445
2825 E Cottonwood Parkway, Suite 200
Salt Lake City, Utah 84121

Subject: Certification of Completion Response Letter

Dear Marshall Empey,

The Western Electricity Coordinating Council (WECC) has received Utah Associated Municipal Power Systems UAMP's Certification of Completion and supporting evidence on 12/29/2008 for UAMP's alleged violation of Reliability Standard MOD-010-0 and Requirement(s) 1, 2. Listed below is the outcome of WECC's official review.

WECC has accepted the Certification of Completion for Requirement(s) 1, 2 of the Reliability Standard MOD-010-0 and have found these requirements to be fully mitigated. No further mitigation of these requirements will be required at this time.

If you have any questions or concerns, please contact Jay Look at jay@wecc.biz. Thanks for your assistance in this effort.

Sincerely,

Bob Kiser

Bob Kiser
Manager of Audits and
Investigations

BK:cm

cc: Tom Florence, UAMP Project Administrator and Internal Compliance Auditor
Lisa Milanes, WECC Manager of Compliance Administration
Jay Look, WECC Senior Compliance Engineer

CONFIDENTIAL



Bob Kiser
Manager of Compliance Audits and Investigations

360.567.4058
bkiser@wecc.biz

February 18, 2009

Marshall Empey
Manager Operations and Planning
Utah Associated Municipal Power Systems
NCR05445
2825 E Cottonwood Parkway, Suite 200
Salt Lake City, Utah 84121

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If you have any questions or concerns, please contact Jay Look at jay@wecc.biz. Thanks for your assistance in this effort.

Sincerely,

Bob Kiser

Bob Kiser
Manager of Audits and
Investigations

BK:cm

cc: Tom Florence, UAMP Project Administrator and Internal Compliance Auditor
Lisa Milanes, WECC Manager of Compliance Administration
Jay Look, WECC Senior Compliance Engineer

Attachment f

Notice of Filing

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Utah Associated Municipal Power Systems

Docket No. NP10-____-000

NOTICE OF FILING
February 1, 2010

Take notice that on February 1, 2010, the North American Electric Reliability Corporation (NERC) filed a Notice of Penalty regarding Utah Associated Municipal Power Systems in the Western Electricity Coordinating Council 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