

May 30, 2012

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

**Re: NERC Full Notice of Penalty regarding San Diego Gas & Electric,  
FERC Docket No. NP12-\_-000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this Notice of Penalty<sup>1</sup> regarding San Diego Gas & Electric (SDGE), NERC Registry ID# NCR05377,<sup>2</sup> 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)).<sup>3</sup>

This Notice of Penalty is being filed with the Commission because NERC Compliance Enforcement Authority (NCEA) and SDGE have entered into a Settlement Agreement to resolve all outstanding issues arising from NCEA's determination and findings of the violation<sup>4</sup> of PER-002-0 Requirement (R) 1. According to the Settlement Agreement, SDGE neither admits nor denies the violation, but has agreed to the assessed penalty of five thousand dollars (\$5,000), in addition to other remedies and actions to

<sup>1</sup> *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards* (Order No. 672), III FERC Stats. & Regs. ¶ 31,204 (2006); *Notice of New Docket Prefix "NP" for Notices of Penalty Filed by the North American Electric Reliability Corporation*, Docket No. RM05-30-000 (February 7, 2008). See also 18 C.F.R. Part 39 (2011). *Mandatory Reliability Standards for the Bulk-Power System*, FERC Stats. & Regs. ¶ 31,242 (2007) (Order No. 693), *reh'g denied*, 120 FERC ¶ 61,053 (2007) (Order No. 693-A). See 18 C.F.R § 39.7(c)(2).

<sup>2</sup> NERC Compliance Enforcement Authority (NCEA) confirmed that SDGE was included on the NERC Compliance Registry as a Generator Operator, Transmission Operator (TOP), Transmission Owner, Generator Owner, Distribution Provider, Load Serving Entity, Purchasing-Selling Entity, Transmission Planner, and Resource Planner in the Western Electricity Coordinating Council (WECC) region on June 17, 2007. As a TOP, SDGE is subject to the requirements of NERC Reliability Standard PER-002-0.

<sup>3</sup> See 18 C.F.R § 39.7(c)(2).

<sup>4</sup> For purposes of this document, each violation at issue is described as a "violation," regardless of its procedural posture and whether it was a possible, alleged or confirmed violation.

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Suite 600, North Tower  
Atlanta, GA 30326  
404-446-2560 | [www.nerc.com](http://www.nerc.com)

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mitigate the instant violation and facilitate future compliance under the terms and conditions of the Settlement Agreement. Accordingly, the violation identified as NERC Violation Tracking Identification Number NCEA201100108 is being filed in accordance with the NERC Rules of Procedure and the CMEP.

### Statement of Findings Underlying the Violation

This Notice of Penalty incorporates the findings and justifications set forth in the Settlement Agreement executed on May 30, 2012, by and between NCEA and SDGE, which is included as Attachment a. 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 (2011), NERC provides the following summary table identifying each 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  | VSL      | Total Penalty |
|---------------------------------------|--------------------------|----------|-------------------|------------------|----------|------|----------|---------------|
| NERC Compliance Enforcement Authority | San Diego Gas & Electric | NOC-1315 | NCEA201100108     | PER-002-0        | 1        | High | Moderate | \$5,000       |

#### PER-002-0

The purpose statement of Reliability Standard PER-002-0 provides: "Each Transmission Operator and Balancing Authority must provide their personnel with a coordinated training program that will ensure reliable system operation."

PER-002-0 R1 provides: "Each Transmission Operator and Balancing Authority shall be staffed with adequately trained operating personnel."

PER-002-0 has a "High" Violation Risk Factor (VRF) and a "Moderate" Violation Severity Level (VSL). The subject violation applies to SDGE's TOP function.

On January 9, 2009, NERC initiated a Compliance Investigation regarding an event that took place on November 7, 2008 (the Event). On November 7, 2008, a fire in a series capacitor bank at a substation in SDGE's service territory resulted in a 500 kV line (TL50001) being taken out of service for

approximately 15 minutes. While that line was out of service, overloads were experienced on Path 49, for which SDGE is not a path operator. A System Operating Limit (SOL) exceedance on Path 49 and Path 44 developed,<sup>5</sup> and load shedding was ordered by the California Independent System Operator (CAISO), and attempted by other parties to relieve this condition.<sup>6</sup>

SDGE had a procedure (GIP2120) for switching the TL50002 series capacitor bank at the same substation. This procedure included a reference to the TL50001 series capacitor bank but did not accurately explain the steps to be taken to operate the TL50001 series capacitor bank. The steps in the GIP2120 procedure were not carried out correctly in the initial attempt by the control room operator to operate the motor operated disconnects (MODs) for the TL50001 series capacitor. Consequently, on the day of the event, the SDGE control room operator was delayed in opening the isolating MODs, thus delaying recovery of the line. By delaying operating the MODs, the line being placed back in service was delayed, extending the SOL exceedance on the two paths. The SDGE control room operator contacted a different SDGE operator who was able to talk the instant operator through the appropriate steps. SDGE's work to return the line to service lasted for about 16 minutes. NCEA found that SDGE, as a TOP, violated PER-002-0 R1 by failing to be staffed with adequately trained operating personnel for less than 1.5% of SDGE's operating personnel.

The duration of the violation was from October 29, 2008 (the date of the operator's last training) to November 7, 2008 (the date of the Event and re-training on the process). Other mitigation activities were completed as part of the formal Mitigation Plan on February 8, 2009.

NCEA determined that this violation posed a moderate risk to the reliability of the bulk power system (BPS) and did not pose a serious or substantial risk to the BPS. Although SDGE was unable to immediately isolate the TL50001 series capacitor bank, the backup protective actions were in place and the path operators where SOL limits were exceeded. These actions included load shedding by other entities, derates of other lines, shifting load, and bringing the TL50001 line back into service. These actions were independent of SDGE's actions regarding opening the isolating MODs on TL50001. The risk posed by SDGE's failure to train all of its personnel in a timely manner was mitigated by the fact that there were other SDGE's operating personnel were adequately trained and able to guide this single operator through the process of operating the MODs.

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<sup>5</sup> The Southern California Import Transmission (SCIT) nomogram, a stability limit, was exceeded by approximately 2,500 MW. Path 49 SOL was exceeded by 980 MW.

<sup>6</sup> Approximately 250 MW of load was shed which interrupted service to 140,000 customers.

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#### Enforcement Authority's Basis for Penalty

According to the Settlement Agreement, NCEA has assessed a penalty of five thousand dollars (\$5,000) for the referenced violation. In reaching this determination, NCEA considered the following factors:

(1) load was shed during the Event (approximately 200 MW by Southern California Edison - Transmission & Distribution Business Unit, none by SDGE). The load shed resulted from SOL exceedance outside of SDGE's service area; (2) SDGE has a compliance program, as memorialized in its Reliability Standards Compliance Plan, and NCEA considered it a mitigating factor in the penalty determination. SDGE has a Compliance Organization, including a designated leader for Reliability Standards. In November 2008, the designated leader was the Vice President of Electric Transmission and Distribution. The designated leader reported to the Chief Operating Officer, who reports to the Chief Executive Officer. The reliability standards organization is independent of Line Management below the level of the Chief Operating Officer; (3) SDGE compliance activities include comprehensive training, including annual training, on Reliability Standards, and all supervisors are responsible for ensuring that all subordinates responsible for Reliability Standards Compliance are adequately trained; (4) the SDGE program includes the potential for adverse personnel action for violation of Reliability Standards up to and including termination; (5) additionally, SDGE was cooperative both during and after the investigation; and (6) there are no previous violations of this Standard by SDGE.<sup>7</sup>

After consideration of the above factors, NCEA determined that, in this instance, the penalty amount of five thousand dollars (\$5,000) is appropriate and bears a reasonable relation to the seriousness and duration of the violation.

#### **Status of Mitigation Plan<sup>8</sup>**

To mitigate this violation, SDGE produced revised procedures laying out the individual steps for the TL500001 line and associated switching equipment and ensured that all operators were subsequently

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<sup>7</sup> On October 14, 2009, NERC submitted an Omnibus filing under NP10-2-000 which addressed violations for certain registered entities including a violation of PRC-005-1 R2 for SDGE in the Western Electricity Coordinating Council (WECC) region. On November 13, 2009, FERC issued an order stating it would not engage in further review of the violations addressed in the Omnibus Notice of Penalty. A NOCV covering a violation of PRC-005-1 R2.1 for SDGE in the WECC region (NOC-462) was filed with FERC under NP10-146-000 on July 3, 2010. On August 27, 2010, FERC issued an order stating it would not engage in further review of the Notice of Penalty. NCEA determined that these prior violations should not serve as a basis for aggravating the penalty because they involved standards that are not the same or similar to the instant standard. Moreover, there was nothing in the record to suggest that broader corporate issues were implicated.

<sup>8</sup> See 18 C.F.R. § 39.7(d)(7).

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trained on the updated procedures (GIP2015 and GIP2120). Copies of the updated procedures are available to all control room operators.

On May 30, 2012, SDGE certified that SDGE's mitigation activities were complete as of February 8, 2009. On January 12, 2012, after reviewing SDGE's submitted evidence, NCEA verified that SDGE's mitigation activities were completed on February 8, 2009.

### **Statement Describing the Assessed Penalty, Sanction or Enforcement Action Imposed<sup>9</sup> 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, October 26, 2009 and August 27, 2010 Guidance Orders,<sup>10</sup> the NERC BOTCC reviewed the Settlement Agreement and supporting documentation on May 7, 2012. The NERC BOTCC approved the Settlement Agreement, including NCEA's assessment of a five thousand dollar (\$5,000) financial penalty against SDGE 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 violation at issue.

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

1. load was shed during the Event (approximately 200 MW by Southern California Edison - Transmission & Distribution Business Unit, none by SDGE);
2. NCEA determined that the violation posed a moderate risk and did not pose a serious or substantial risk to the reliability of the BPS, as discussed above;
3. the violation constituted SDGE's first occurrence of violation of the subject NERC Reliability Standard;<sup>11</sup>
4. NCEA reported that SDGE was cooperative throughout the compliance enforcement process;

<sup>9</sup> See 18 C.F.R. § 39.7(d)(4).

<sup>10</sup> *North American Electric Reliability Corporation*, "Guidance Order on Reliability Notices of Penalty," 124 FERC ¶ 61,015 (2008); *North American Electric Reliability Corporation*, "Further Guidance Order on Reliability Notices of Penalty," 129 FERC ¶ 61,069 (2009); *North American Electric Reliability Corporation*, "Notice of No Further Review and Guidance Order," 132 FERC ¶ 61,182 (2010).

<sup>11</sup> SDGE's other violations, as discussed in n. 7 above, were not considered for purposes of aggravating the penalty because they involved standards that are not the same or similar to the instant standard. Moreover, there was nothing in the record to suggest that broader corporate issues were implicated.

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5. SDGE had a compliance program at the time of the violation which NCEA considered a mitigating factor, as discussed above;
6. there was no evidence of any attempt to conceal a violation nor evidence of intent to do so; and
7. NCEA reported that there were no other mitigating or aggravating factors or extenuating circumstances that would affect the assessed penalty.

For the foregoing reasons, the NERC BOTCC approved the Settlement Agreement and believes that the assessed penalty of five thousand dollars (\$5,000) is appropriate for the violation and circumstances at issue, and is consistent with NERC's goal to promote and ensure reliability of the BPS.

Pursuant to 18 C.F.R. § 39.7(e), 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 Settlement Agreement by and between NCEA and SDGE executed May 30, 2012, is included as part of this Notice of Penalty as Attachment a;

#### **A Form of Notice Suitable for Publication<sup>12</sup>**

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

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<sup>12</sup> See 18 C.F.R § 39.7(d)(6).

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San Diego Gas & Electric  
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**Notices and Communications:** Notices and communications with respect to this filing may be addressed to the following:

|   |  |
|---|--|
| <p>Gerald W. Cauley<br/>President and Chief Executive Officer<br/>North American Electric Reliability Corporation<br/>3353 Peachtree Road NE<br/>Suite 600, North Tower<br/>Atlanta, GA 30326<br/>(404) 446-2560</p> <p>David N. Cook*<br/>Senior Vice President and General Counsel<br/>North American Electric Reliability Corporation<br/>1325 G Street N.W., Suite 600<br/>Washington, DC 20005<br/>(202) 400-3000<br/>(202) 644-8099 – facsimile<br/>david.cook@nerc.net</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*<br/>Associate General Counsel for Corporate and Regulatory Matters<br/>North American Electric Reliability Corporation<br/>1325 G Street N.W.<br/>Suite 600<br/>Washington, DC 20005<br/>(202) 644-8052<br/>(202) 644-8099 – facsimile<br/>rebecca.michael@nerc.net</p> <p>Sean Bodkin*<br/>Compliance Enforcement Coordinator<br/>North American Electric Reliability Corporation<br/>1325 G Street N.W., Suite 600<br/>Washington, DC 20005<br/>(202) 400-3022<br/>(202) 644-8099 – facsimile<br/>sean.bodkin@nerc.net</p> <p>Stacy Van Goor*<br/>Assistant General Counsel - Regulatory<br/>San Diego Gas &amp; Electric<br/>101 Ash Street<br/>HQ 12<br/>San Diego, CA 92101<br/>svangoor@semprautilities.com</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

Gerald W. Cauley  
President and Chief Executive Officer  
North American Electric Reliability Corporation  
3353 Peachtree Road NE  
Suite 600, North Tower  
Atlanta, GA 30326  
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David N. Cook  
Senior Vice President and General Counsel  
North American Electric Reliability  
Corporation  
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Rebecca J. Michael  
Associate General Counsel for Corporate  
and Regulatory Matters  
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cc: San Diego Gas & Electric  
NERC Compliance Enforcement Authority

Attachments



## **Attachment a**

**Settlement Agreement by and between NCEA  
and SDGE executed May 30, 2012**

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**NOTICE OF SPREADSHEET NOTICE OF PENALTY TREATMENT AND  
SETTLEMENT AGREEMENT  
BETWEEN  
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION  
AND  
SAN DIEGO GAS AND ELECTRIC COMPANY**

1. San Diego Gas and Electric Company (SDGE) neither admits nor denies the alleged violation of NERC Reliability Standard PER-002-0 Requirement 1 and has agreed to the proposed penalty to be assessed to SDGE, in addition to mitigation actions undertaken to mitigate the instant alleged violation.
2. Acceptance of this Agreement results in the assessment of \$5,000 for the violation listed in Attachment A, subject to approval or modification by the North American Electric Reliability Corporation (NERC) and the Federal Energy Regulatory Commission (FERC or Commission). Payment terms, if applicable, will be set forth in the invoice to be submitted by the applicable Regional Entity after Commission approval of the instant Notice of Penalty.
3. SDGE has agreed to enter into this Settlement Agreement with the North American Electric Reliability Corporation (NERC) to avoid extended litigation with respect to the matters described or referred to herein, to avoid uncertainty, and to effectuate a complete and final resolution of the issues set forth herein. SDGE agrees that this Settlement Agreement is in the best interest of the parties and in the best interest of bulk-power system reliability.
4. The violations listed in Attachment A will be considered Confirmed Violations for all purposes and may be used as aggravating factors in accordance with the NERC Sanction Guidelines for determining appropriate monetary penalties or sanctions for future violations.
5. SDGE certifies that the violation listed in Attachment A has been mitigated by the following activities:
  - a. Procedures GIP 2105 and GIP 2120 have been updated to reflect specific references to the TL500001 line and associated switching equipment.

- b. All operators were adequately trained on the updated procedures outlined in item 5a.
  - c. Updated procedures GIP2105 and GIP2120 are available on-site to all control room personnel.
6. NCEA has verified on January 12, 2012 that the violation listed in Attachment A has been mitigated as of February 8, 2009 as described in Attachment A.
  7. The disposition agreed to herein represents a full and final disposition of the violation listed in Attachment A, subject to approval or modification by NERC and FERC with notice to SDGE in accordance with the NERC Rules of Procedure. SCDGE waives its right to further hearings and appeals; unless and only to the extent that SDGE contends that any NERC or Commission action on this Settlement Agreement contains one or more material modifications to this Settlement Agreement.
  8. In the event SDGE fails to comply with any of the stipulations, remedies, sanctions or additional terms, as set forth in this Settlement Agreement, NERC will initiate enforcement, penalty, or sanction actions against SDGE to the maximum extent allowed by the NERC Rules of Procedure, up to the maximum statutorily allowed penalty. Except as otherwise specified in this Settlement Agreement, SDGE shall retain all rights to defend against such enforcement actions, also according to the NERC Rules of Procedure.
  9. Each of the undersigned warrants that he or she is an authorized representative of the entity designated, is authorized to bind such entity and accepts the Settlement Agreement on the entity's behalf.
  10. The undersigned representative of each party affirms that he or she has read the Settlement Agreement, that all of the matters set forth in the Settlement Agreement are true and correct to the best of his or her knowledge, information and belief, and that he or she understands that the Settlement Agreement is entered into by such party in express reliance on those representations.

Accepted:

David Cook by R. Mitchell

David Cook  
General Counsel  
North American Electric Reliability  
Corporation

5/29/12  
Date

David Geier  
David Geier  
Vice President, Electric Operations

5/30/12  
Date

| Attachment A                                 |   |          |                     |   |  |                      |      |                       |                          |  |   |   |                                |                          |  |                            |  |   |  |
|--|---|----------|---------------------|---|--|----------------------|------|-----------------------|--------------------------|--|---|---|--------------------------------|--------------------------|--|----------------------------|--|---|--|
| Region                                       | Registered Entity                       | NCR_ID   | NERC Violation ID # | Notice of Confirmed Violation or Settlement Agreement | Description of the Violation   | Reliability Standard | Req. | Violation Risk Factor | Violation Severity Level | Risk Assessment  | Violation Start Date  | Violation End Date  | Total Penalty or Sanction (\$) | Method of Discovery      | Description of Mitigation Activity   | Mitigation Completion Date | Date Regional Entity Verified Completion of Mitigation | "Admits," "Agrees/Stipulates," "Neither Admits nor Denies," or "Does Not Contest" | Other Factors Affecting the Penalty Determination, including Compliance History, Internal Compliance Program and Compliance Culture  |
| NERC Compliance Enforcement Authority (NCEA) | San Diego Gas & Electric Company (SDGE) | NCR05377 | NCEA201100108       | Settlement Agreement                                  | <p>On January 9, 2009, an Investigation by NERC was initiated regarding an event that took place on November 7, 2008 (the Event). On November 7, 2008 a fire in a series capacitor bank at a substation in SDGE's service territory resulted in a 500 kV line (TL50001) being taken out of service for approximately 15 minutes. While that line was out of service, overloads were experienced on Path 49, for which SDGE is not a path operator. A System Operating Limit (SOL) exceedance on Path 49 developed, and load shedding was ordered and attempted by other parties to relieve this condition.</p> <p>SDGE had a procedure (GIP2120) for switching the TL50002 series capacitor bank at the same substation. This procedure included a reference to the TL50001 series capacitor bank. The steps in the GIP2120 procedure were not accurately carried out in the initial attempt to operate the motor operated disconnects (MODs) for the TL50001 series capacitor. Consequently, NCEA concluded that, on the day of the event, the SDGE control room operator, who equates to less than 1.5 % of SDGE's operating personnel, was delayed in opening the isolating MODs. NCEA found that SDGE, as a Transmission Operator, violated PER-002-0 R1 by failing to be staffed with adequately trained operating personnel.</p> | PER-002-0            | R1   | High                  | Moderate                 | This violation posed a moderate risk and not a serious or substantial risk to the reliability of the bulk power system (BPS). Although SDGE was unable to immediately isolate the TL50001 series capacitor bank, this violation did not pose a serious or substantial risk to the reliability of the BPS because the system is designed so that the loss of a single line does not result in load shedding. The system has backup protective actions and other tools at the disposal of path operators. These actions included load shedding by other entities, derates of other lines, shifting load, and bringing the TL50001 line back into service. These actions were independent of SDGE's actions regarding opening the isolating MODs on TL50001. The risk posed by SDGE's failure to train all of its personnel in a timely manner was mitigated by the fact that there were other SDGE's operating personnel were adequately trained and able to guide this single operator through the process of operating the MODs. | 10/29/2008 (the date of the operator's last training)<br>The Event occurred on 11/7/08 for approximately 50 minutes. SDGE's work to return the line to service lasted for about 16 minutes. | 11/7/2008<br>On that same day, the correct procedures for operating the MODs was explained by SDG&E personnel to the SDG&E operator who made the initial, unsuccessful attempt to operate the MODs. Other mitigation activities were completed as part of the formal Mitigation Plan on 2/8/2009. | \$5,000                        | Compliance Investigation | SDGE revised procedures (GIP2105 and GIP2120) laying out the individual steps for the TL500001 line and associated switching equipment. All operators were subsequently trained on the updated procedures. Copies of the updated procedures are available to all control room operators. | 2/8/2009                   | 1/12/2012  | Neither Admits nor Denies   | <p>SDG&amp;E has a compliance program, as codified in its Reliability Standards Compliance Plan, and NCEA considered it a mitigating factor in the penalty determination.</p> <p>SDGE has a Compliance Organization, including a Designated Leader for Reliability Standards. In November 2008, the Designated Leader was the Vice President of Electric Transmission and Distribution. The Designated Leader reported to the Chief Operating Officer, who reports to the Chief Executive Officer. The reliability standards organization is independent of Line Management below the level of the Chief Operating Officer.</p> <p>SDGE compliance activities include comprehensive training, including annual training, on reliability standards, and all supervisors are responsible for ensuring that all subordinates responsible for Reliability Standards Compliance are adequately trained.</p> <p>The SDGE program includes the potential for adverse personnel action for violation of Reliability Standards up to and including termination.</p> <p>Additionally, SDGE was extremely cooperative both during and after the investigation. Load was shed during the Event (approximately 200 MW by SCE, none by SDGE). The load shed resulted from SOL exceedances which were outside of SDGE's service area.</p> <p>There are no previous violations of this Standard by SDGE.</p> |

**Attachment b**

**Notice of Filing**

UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

San Diego Gas & Electric

Docket No. NP12-\_\_\_\_-000

NOTICE OF FILING  
May 30, 2012

Take notice that on May 30, 2012, the North American Electric Reliability Corporation (NERC) filed a Notice of Penalty regarding San Diego Gas & Electric in the NERC Compliance Enforcement Authority 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](mailto:FERCOnlineSupport@ferc.gov), or call (866) 208-3676 (toll free). For TTY, call (202) 502-8659.

Comment Date: [BLANK]

Kimberly D. Bose,  
Secretary